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Limerick Chamber Advancing business together

Limerick Chamber

Submission on Draft BusConnects Plan for Limerick

April 2023

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Introduction

Limerick Chamber would like to thank the National Transport Authority (NTA) for the opportunity to submit Limerick Chamber member's views on the draft plan. Limerick Chamber is the largest business representative body in the Mid-West, with c. 400 member organisations supporting 50,000 jobs across the region. Given the potential positive benefit that the draft plan will have on employees' access to the workplace, we reached out to members directly to gather their thoughts on the plan.

There are many positive steps under the draft plan and we commend the NTA on the hard work and open consultation process undertaken so far. Limerick Chamber welcomes the increased amount of bus service under the plan, the inclusion of a 24-hour bus route for a key route in the city and the elimination of interchange fares. The inclusion of the Dock Road route is also welcome given the substantial number of businesses in the area and large-scale residential development underway. Furthermore, the extension of this route through development lands at Mungret is most welcome as it links residential areas to key nodes of employment and schools along the route. The introduction of an urban bus route to the Ennis Road is also a positive step so too is an all day bus route through Raheen Business Park. The greater emphasis on weekends and outside peak times will benefit those employees that work shifts and is a welcome move by employers. In terms of the National Technology Park, the provision of a route through the park, rather than stopping at the entrance, is most welcome from an employer and employee point of view.

However, as positive as the draft plan is, there remain some

Observations & Recommendations

Enterprise Access:

Enterprise access is crucially important for organisations looking to expand their footprint, particularly those that do not have additional space to provide car parking. It is also important from a talent attraction and retention perspective whereby not all potential employees will have access to a car and would in turn prefer to use a bus, but in the event of a lack of bus infrastructure it may result in organisations having difficulty attracting staff. Furthermore, it is important, with the policy to decrease car use, that parents that choose to use the bus are able to drop their children off at school using the bus. While a difficult exercise, failing to put in this school and enterprise routes will likely result in parents using a private car, as it may not be feasible to use a bus for school and work.

City Centre

It is imperative that as part of BusConnects that a mobility plan for the city centre is brought forward, combining a delivery plan with a traffic management plan. This is something that Limerick Chamber members based in the city centre feel is of critical importance to enterprise. There are several public construction projects and plans underway for the city centre which are causing disruption to business operations and the feeling amongst members is that a disjointed approach to development and transport infrastructure is not cohesive with a stable environment to do business. We understand that the NTA has released funding in this regard to carry out a study in relation to mobility in the city centre and we welcome the commitment within BusConnects to undertake this study in 2023 prior to the implementation of BusConnects, however, Limerick Chamber feels that this should be undertaken in conjunction with BusConnects to ensure that there is harmony between all aspects of transport for the city centre. For example, under the existing consultation process people are asked their views on O'Connell Street as a two-way transport corridor without any further details on how this will influence smaller streets such as Roches St. / Shannon St., Cecil St. / Lower Cecil St. / Glentworth St. and Lower Glentworth St. This is why it is important to bring a detailed mobility plan and BusConnects forward together in a co-designed approach. The transport corridor also raises questions around how businesses are expected to receive deliveries.

concerns for businesses and Limerick Chamber has provided observations and recommendations to reflect the same. Limerick Chamber members, particularly those in the city centre, have had an increased focus on mobility over the last several years. There are a multitude of projects underway for the city, including active travel projects, BusConnects, the O'Connell Street project and the wider implementation of the Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS). As of now, there is little information about how these projects will influence mobility in the city centre, that is active and public transport projects but also private cars and delivery vehicles. Limerick Chamber welcomes the commitment in the Draft BusConnects document regarding operating bus services on O'Connell Street, Patrick Street, Roches Street and William Street requiring the need for review as part of the Limerick City Centre Transport Study, which is outlined to be complete before BusConnects is implemented. Limerick Chamber asks that the operation of Sarsfield Bridge also be included in this study. It is important that BusConnects and the Transport / Mobility Study complement each other and are co-designed, providing clarity and security to business owners in the city centre as well as taking account of business feedback. However, it is also important that the Transport Study is not delayed on account of the BusConnects plan. The BusConnects plan will be a lengthy process with significant public consultation, it could delay the start of other studies and both plans should inform each other. Furthermore, the enforcement of parking rules is critical to the success of any travel plan, especially when it comes to the city centre. In this regard, while outside the NTA remit, we would like to see increased enforcement on illegal parked vehicles that often disrupt the flow of mobility and deliveries to businesses.



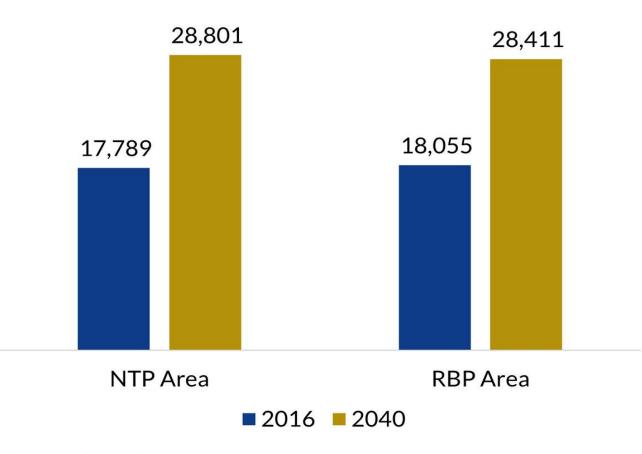
O'Connell Street has significant potential, there is a unique opportunity to capitalise on the investment made and make it a first-class shared public space, while being mindful of business needs. The proposed plan under BusConnects will see Limerick City's primary street turned into a conduit for buses rather than a destination for shoppers and businesses. It is a missed opportunity to not use the significant time and funding already put into O'Connell Street to turn it into a more shared public pedestrian space and instead reducing it to a transport corridor. We would like to see a more forward-thinking approach in this regard.

While not a carbon copy, there is the potential to look at Grafton Street in Dublin as a potential solution for the operation of O'Connell Street in Limerick. The current system on Grafton Street sees it pedestrianised for a key portion of the day with deliveries being made outside these hours, this could be adapted for Limerick potentially using timed electronic bollards. A similar type of technology has previously been in operation at the intersection of Bedford Row and Thomas Street. This would allow deliveries and use during peak morning times but also allow for a public realm space. For times outside the pedestrianised portion of the day, a one way system with a dedicated bus lane and other general vehicle lane would be appropriate to encourage traffic flow. Using this approach would align O'Connell Street more with Grafton Street as a shopping node, rather than the proposed plan which could see O'Connell Street emulate the quays in Dublin or Patrick Street in Cork with bus congestion. This system could be implemented from the intersection of William Street / Sarsfield Street to Cecil Street and Lower Cecil Street. However, it is off critical importance that a mobility plan and transport study is carried out at the same time the operation of the street is being decided.

In conjunction with this, there is also the potential to use existing road infrastructure. Henry Street, for most of its distance, has four lanes which eventually merge into three. There are also dedicated stop lanes for buses. There is a case to be made that using Henry Street, instead of O'Connell Street, would be a more prudent approach and will likely have minimal disruption when compared to O'Connell Street. This could be linked up with Parnell Street to form a city centre orbital route for public transport.

Again, the primary issue from a business perspective with the draft plan is there is no wider mobility plan for the city. The concern from businesses is that without a proper mobility plan in place, traffic not being able to use the street will turn to smaller streets and exacerbate congestion on those areas which may result in people choosing not to visit the city centre. Businesses also do not have sight of how the proposed plan will interfere with deliveries. This is why a city centre mobility strategy needs to be brought forward with bus connects.

Fig 1.1: Residential Population (NTP & RBP Areas)



Source: LSMATS

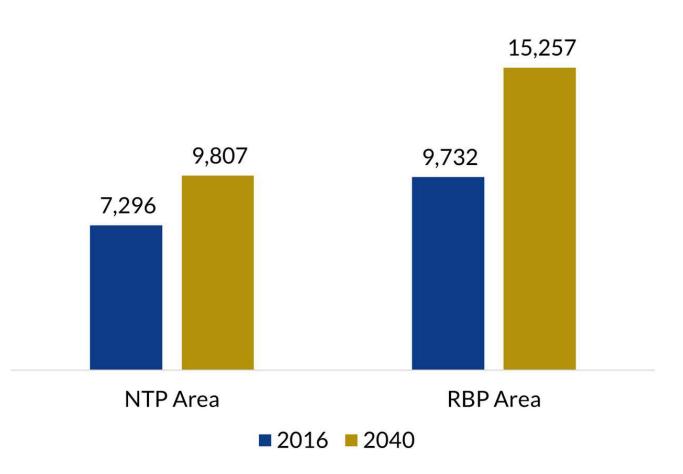
As per the LSMATS, 'Measure BC3' outlined that the National Transport Authority (NTA) will work with Limerick City and County Council to examine the feasibility of removing general traffic from Sarsfield Bridge in order to reduce delays for bus services. While Limerick Chamber agrees with the need to reduce bus journey times, Sarsfield Bridge often acts as the primary node to the city centre for those on the North Side of the city and removing general traffic would likely result in serious congestion issues in other areas. The infrastructure must be developed in a way that encourages people to visit the city rather that pushing them into cars for longer journeys by creating more barriers to mobility within the city. The absence of an overarching mobility plan for Limerick city makes it impossible for assess the impact of the proposed removal of traffic from Sarsfield Bridge.

National Technology Park and Raheen Business Park Link

Limerick Chamber welcomes the increased provision of services for areas of high employment such as Raheen Business Park (RBP) and the National Technology Park (NTP). However, there is the case for an orbital route to be used between Castletroy and Raheen utilising the existing M7 and M20, at peak times, to link up areas within proximity to the NTP (Annacotty, Castleconnell, Castletroy and University Area) and also RBP (Dooradoyle, Mungret and Raheen). This would create an express route for commuters and provide time efficiencies rather than travelling through the city centre and likely sitting in congestion.



Fig 1.2: Employment Population (NTP & RBP Areas)



Source: LSMATS

While there is a direct route from the NTP to the entrance to the RBP, it passes through the city centre via areas such as the Parkway Roundabout which sees serious congestion issues at peak times and is constrained by one lane for traffic from the roundabout into the city centre.

The new 24-hour route is much welcomed in the draft plan and will be beneficial for our members and their employees along this route and those in the RBP. The frequency of the 4A route which serves the NTP and RBP is welcomed, however given the levels of congestion along the route, there is a concern for this service is that it will get caught in the pre-existing congestion and not be able to provide a more efficient alternative transport option for those working in the NTP and RBP.

Under the residential population projections as part of the Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) the residential population within proximity to the NTP is expected to grow by 62% to 28,801 (Fig 1.1), while the population close to the RBP is expected to grow by 58% to 28,411. Meanwhile, the employment population (Fig 1.2) within proximity to the NTP will increase by 34% to 9,807, and the employment population for RBP will increase by 57% to 15,257.

There will be a significant number of people travelling between these two areas for work purposes and an orbital non-stop route for peak employment times between these two locations would mean significant time savings for employees which in turn would make people more likely to use the service without the unnecessary delays of travelling through the city centre. Annacotty Business Park is strategically located within a short distance from both the M7 and R445, with over 33 companies situated on the grounds of the park employing c. 3,100 people. Given its significant employment numbers it should also have been included in the 'jobs & higher education' density map under the proposed BusConnects plan.

The lack of adequate public and active travel infrastructure not only forces employees to travel by private car but it creates an unlevel playing field for businesses within the park when attempting to attract staff because they must have a car for commuting purposes (due to lack of appropriate public transport infrastructure). In terms of infrastructure required for turning a bus around, the park has a road running along its perimeter which takes approximately 5 minutes to traverse by vehicle, making the infrastructure requirement minimal furthermore there is appropriate available land at the front of the park if other infrastructure was required.

In some instances, employees who do not have access to a car must get a bus to Plassey in Castletroy and walk to the Annacotty Business Park. While there is a footpath from the R445 Dublin Road to the Annacotty Business Park following the R506 on one side, there are some critical areas of concern along the footpath. Firstly, there is the entrance to Clyduff, where there are no traffic lights or pedestrian crossing for those using the footpath, this is a key concern especially in dark mornings and evenings. In this regard we would like to see a safer crossing for pedestrians. Secondly, there is the railway crossing, where pedestrians and vehicles become dangerously close on the road. This should also be remedied in conjunction

We note that the Draft BusConnects document notes the "relatively small size of Limerick and concentration of demand in the City Centre means that larger numbers of journeys are served by focusing investment on high frequency interconnecting radial routes". However, as outlined above, given the employment and residential population for the Raheen and Castletroy area Limerick Chamber feels this could be serviced by an orbital route at peak hours, in addition to more frequent radial routes.

Furthermore, when considering new bus routes, we ask the NTA be mindful of the work undertaken in developing active travel and protecting this infrastructure – this is seen as critical by some of our larger members who have increased their drive to help employees cycle to work. For example, significant work was recently undertaken in the RBP to increase active travel.

Annacotty Business Park Link

Under the draft plan there is no public transport access to the Annacotty Business Park. Our members in the park have shown great support for active travel projects in the past with the desire to link up the park with active travel projects such as the UL to Annacotty Greenway, unfortunately, this has not yet come to pass. The same holds true for access to public transport, it is a missed opportunity for the BusConnects plan to exclude Annacotty Business Park from the route plan and it is an item that Limerick Chamber recommends rectifying.



with the provision of a bus route.

In terms of travelling to work, there is an existing bus route (332) leaving Limerick City Centre at 06:30, 09:30 (morning times) that could drop employees to the Annacotty Bridge stop from here employees would have a c. 30-minute walk to the business park, in addition to the c. 25-minute bus journey. This is not adequate and will not encourage people to use public transportation. The 323 also provides some options, albeit inadequate, leaving the city centre at 06:45 and 09:45 (morning times) with the stop being Annacotty Bridge - however this stop is to be removed under the draft plan.

There are other options to use the 304/304A which see a potential commuter walking longer distances to Annacotty Business Park (c. 51 minutes) and a change of bus service at the University of Limerick, in addition to bus travelling times. In fact, some of our members within the Business Park have outlined that some of their staff with no access to a private vehicle already undertake this significant journey.

The Draft Network does not include a stop at the Annacotty Bridge but provides a route through the National Technology Park (NTP) which could provide additional value to those that normally walk from the entrance of the NTP, unfortunately, this does not go far enough for employees and organisations in the Annacotty Business Park. The haphazard nature of existing bus times and lack of planned future routes is a key concern for a critical employment node for the county and may limit expansion in the future which will negatively impact potential inward investment and the potential for job growth.

In fact, under the Limerick Development Plan, for any business that wishes to expand, they must provide additional parking spaces (Table 1.1). Concessions can be made on a case-by-case basis, but oftentimes public transport is a key factor.

	Zone 1	Zone 2	Zone 3
Large Scale office	1 space per 200	1 space per 150	1 space per 150
business /	sqm	sqm	sqm
professional			
High Tech science	1 space per 200	1 space per 150	1 space per 100
	sqm	sqm	sqm
General	1 space per 300	1 space per 200	1 space per 100
Manufacturing	sqm	sqm	sqm
Commercial Storage	Not applicable	1 space per 500	1 space per 500
distribution /		sqm	sqm
logistics			

Table 1.1: Employment Population (NTP & RBP Areas)

Source: Limerick Development Plan 2022 - 2028

Therefore, any business within the park that wishes to expand their footprint is limited by the finite development space and also the need to provide car parking spaces. Introducing a bus route would go a long way to alleviating this issue and would encourage future employment growth within the park - this would also be in keeping with national policy as failure to do so will keep, and likely increase, car use.

While a bus service at peak times (outlined in the survey) would be sufficient for many employees to this area, a frequent bus service to serve those working shift work would holistically serve the needs of the business park and the c. 3,100 people who work there. Given the only realistic singular transport option is to drive to the business park, a regular bus service could be seen as a way to reduce private car usage and it is something that members in the park would like to see.

While no analysis was undertaken as part of the LSMATS for

Fig 1.3: Primary Mode of Travel to Annacotty Business Park

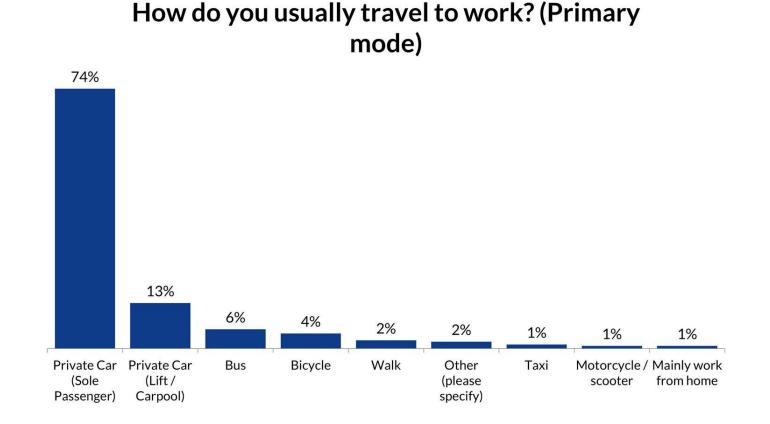
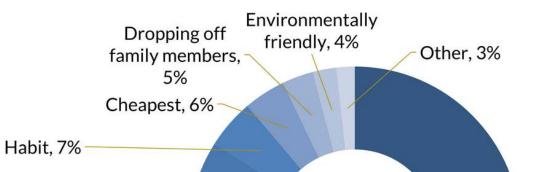


Fig 1.4: Reason for Choosing that Mode of Travel

What is your reason for choosing that mode of transport?



the provision of bus services directly to the Annacotty Business Park, there was an element of the route included – from the Annacotty Roundabout travelling along the R445 / Dublin Road to the Mackey / Newport Roundabout (Denoted routes 6030, 6031, 6032 and 6033 in the report). Some parts of this route were chosen as part of the BusConnects route, however, the spur to the Newport / Mackey Roundabout was not included in the draft route, nor was any analysis completed as to the ridership of a route to Annacotty Business Park. This also goes against the plan to provide a bus focused park and ride in proximity to the Mackey Roundabout. A bus route in this regard would also help businesses along the R445 who employ significant numbers of staff.

As part of our consultation work with businesses in Annacotty Business Park, we carried out an employee transport survey. The high level results of the survey are as follows. The results provide overwhelming evidenced based support for the implementation of a bus route to the business park. For more information and further detail on the survey please see appendix 1.

High level survey results

• 245 respondents

- 87% travel to the park via private car.
- 81% used that mode of transport because of a lack of alternative.
- 89% live more than 5km away.
- 47% take on average 16 to 30 minutes to get to work.
- 75% arrive between 7.30am and 9.30am.
- 74% leave work between 4:31pm and 6:00pm.
- 94% outlined the desire for a bus route.
- 80% outlined they would be willing to use the bus

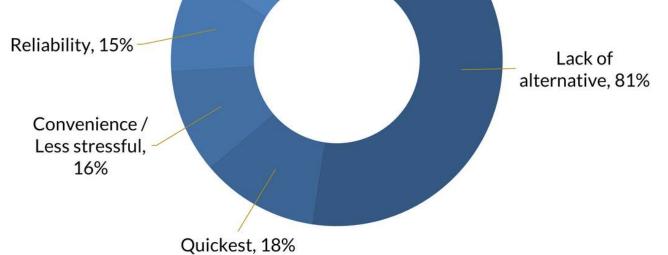
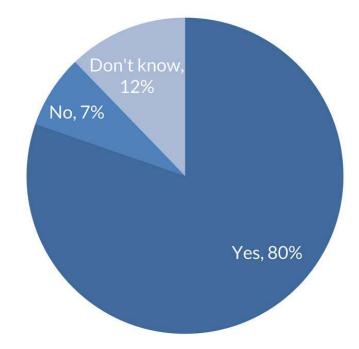


Fig 1.5: Willingness to Use Bus Route

If a bus route was available to the business park, would you use it?



Note: For more graphs and results please see appendix 1. In some instances, respondents were given the option to select multiple answers. Therefore some graphs add up to greater than 100%.

Mackey Roundabout

In Limerick Chamber' submission on the LSMATS, we advocated for improvements at the Mackey / Newport Roundabout to ease dangerous levels of congestion and create a safer journey for those travelling to the National Technology Park (NTP). Measure RS5 within the LSMATS was welcome in this regard. As part of measure RS5, there was the intention to deliver a bus-based Park and Ride in the vicinity of the M7 Junction and the Mackey Roundabout. The draft BusConnects plan includes no information in this regard. It would make sense to include a bus route to this proposed park and ride which should include a spur to the Annacotty Business Park. However, the proposed BusConnects plan does not contain any detail in terms of Park and Rides. Given the urgent requirement for the slip road, as well as a potential park and ride, this should be reflected in the draft BusConnects plan.

Milford Care Centre

Milford Care Centre is an incredible asset to have for the people of the Mid-West. They provide an excellent service to those that need compassionate care at a very sensitive time in the lives of the community. We note as part of the BusConnects plan that a route is planned to intersect the lands between Milford Care Centre and Milford National School. Named the 'Infinity Woodland Pathway'. Limerick Chamber asks that the NTA liaise with Milford Care Centre and the owners of the 'Infinity Woodland Pathway' land to find a workable solution that will minimally impact the care centre, its residents, and its ability to expand and provide green space for its residents now

Shannon Link

We note that Shannon, among others, has been excluded from the draft plan as "these settlements are outside the catchment of the city bus network" and are being reviewed as part of Connecting Ireland instead.

Connecting Ireland outlines that the Galway to Cork regional bus routes (51, 251 and 300) service existing travel along the corridor. However, only route 51 stops at Shannon. Limerick Chamber welcomes, the proposed plan under connecting Ireland that suggests services every 30-minutes for this corridor, however it is important that this includes route 51 to Shannon. Local routes 341 and 343 also service Limerick to Shannon. However, route 341 provides a very low level of service traveling just one time per day.

The 343 service takes on average 53 minutes to get to Shannon Free Zone from Limerick with 21 stops in between, to Shannon Airport this route takes approximately one hour with c. 28 stops. The journey to the Shannon Free Zone by private car typically takes 25 minutes and to the airport it is typically 30 minutes. Therefore, with the existing 343 system it is more time efficient to use a car, which would act as discouragement to take public transport.

In terms of the regional bus route system, route 51 typically takes 33 minutes to get to the airport from Limerick City with no stops in between. Route 51 does not stop at the Shannon Free Zone, where most of the employment in Shannon resides. On a return journey, from Shannon to Limerick, route 51 stops

and into the future.

Ballysimon Road Link

The draft network plan removes bus route access along the Ballysimon Road. While this will not be an issue for those employers closer to the new stop at Groody, the connection to Childers Road raises some concerns. Firstly, it will be a lost opportunity for those employers based further away, particularly around the Eastlink and Eastway Business Parks. Furthermore, providing a route and bus stop along the Ballysimon Road would mean the avoidance of the congestion normally experienced on Childers Road and would provide quicker access to the city centre and other areas. The improvements to the Ballysimon Road aspect of the scheme must be cohesive with future rail and park and ride plans for the area. Again, there is no indication how the proposed plan will work with proposed Park and Rides within the LSMATS. However, while acknowledging the limitations of Childers Road, the link through the Towlerton lands is welcome given the significant development underway in the area.



at Bunratty normally resulting in a slightly longer trip.

The LSMATS, in its Transport Modelling Assessment Report, provide a case for the Limerick / Shannon route describing the route as "attracting significant demand" and being "over the design capacity in some peak, though under the crush capacity" (Fig 1.6).

The LSMATS sets out the residential population increase for Shannon to be 34% (increasing to 13,404) while employment in the Shannon area will increase by 40% (increasing to 13,794) (Fig 1.2). Meanwhile, the core Limerick City Centre area, excluding other city locations, will see its residential population increase by 39% (increasing to 8,443) while those working in the city centre will increase by 30% (to 12,749). These two areas alone, including existing commercial development in the Shannon Free Zone will increase the demand for public transport options between the two areas.

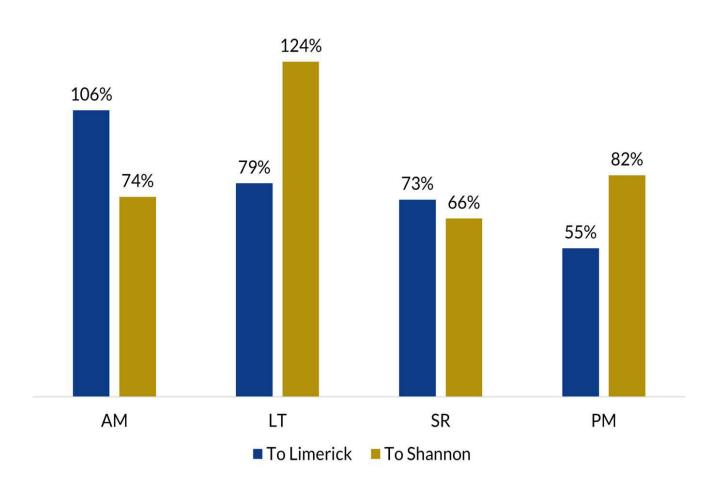
Therefore, there is scope within the BusConnects plan for Limerick that a route for Shannon is absolved into the plan to make transport between Limerick, Shannon Free Zone and Shannon Airport more time efficient. This could be done by increasing the frequency of route 51 to every 30 minutes (as allowed for in the connecting Ireland plan) but also adding in a stop at the Shannon Free Zone. Bringing the route under BusConnects for Limerick will allow for a more cohesive plan for public transport to the main employment nodes which would be in keeping with the Limerick-Shannon Metropolitan Area Transport Strategy.

The draft BusConnects plan is user friendly and easy to understand changes and timings. However, the same cannot be said for the Connecting Ireland plan which is very confusing for most and makes a holistic view of the county and region very hard to decipher.

It is worth noting that as part of BusConnects for Cork, the plan includes multiple locations outside the Cork City area that are at a similar, or greater, distance as Shannon is to Limerick (see table 1.2). The Mid-West is an incredibly connected region and thus there are synergies and many areas of common interest for Limerick City, Shannon and other county towns with people living and working in one or the other and commuting between the two. It would be incredibly disappointing if an arbitrary county line stopped Shannon, and other areas, being included in the plan and would inhibit people's abilities to move from private cars to public transport. Furthermore, Shannon Airport, a very important asset, would be outside the scope of the plan. Given the importance of the airport to businesses in Limerick, it must be included as part of the finalised BusConnects plan. There must be a more cohesive approach to the inclusion of Shannon and not two different plans which may result in a disjointed approach.

Furthermore, The LSMATS also noted the potential for enhanced direct services from Shannon Airport to Cork and Galway. On any given day there are 40 coaches from Galway and 12 coaches from Cork going to Dublin Airport. In contrast there are no direct services between Galway and Shannon Airport or between Shannon Airport and Cork. Having regard to a primary aim of the National Planning Framework (NPF), being to promote an increased proportion of economic activity in second-tier cities, we consider that a provision for appropriate direct public transport services between Shannon Airport and the cities along the West Coast is of critical importance. We would ask that this is also considered as part of both the BusConnects Limerick and the Connecting Ireland plans. Furthermore, it is essential that these connections coincide with flight times to ensure optimal usage.

Fig 1.6: Limerick / Shannon LSMATS Modelling

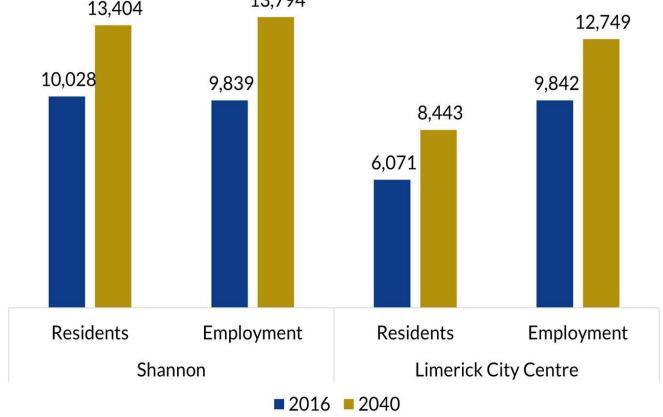


Source: LSMATS

Fig 1.7: Employment & Residential Population (Shannon & Limerick City Centre)

	10 70 1
	13,794
10 10 1	1.1.7.74

Finally, there is no mention in either Connecting Ireland or the draft Bus Connects plan for Limerick to implement a service between Shannon, TUS and UL. Enhancing links between Shannon and Universities in Limerick was identified as a goal in the LSMATS. The economic benefits of increasing a community's access to education centres is well documented. Equally improving access between universities and industry allows better knowledge sharing, leads to innovation that solves complex problems, drives economic growth. On reviewing the Limerick Bus Network plans, it would appear that extending Routes 2A and 6 from Coonagh to Shannon would address this issue by connecting Shannon to both the TUS campus and onwards to UL. Limerick Chamber hopes that this could be addressed under the current plans and that this route is extended with a direct service to Shannon.



Source: LSMATS



Improved County Connectivity

It is disappointing the draft BusConnects plan leaves key areas of the county out of the overall plan. County towns such as Adare, Castleconnell, Croom, Rathkeale, Foynes and Newcastle West are disappointingly left out. It is Limerick Chamber's view that the BusConnects plan must represent a more wholistic view of the county as it does in Corks case with towns and villages on the periphery of the city connected via radial routes.

While Limerick Chamber welcomes the city and suburban focus on the draft plan, there must be greater options for those living and working in County Limerick. A common observation amongst those living and working in more rural areas is that, with the policy to decrease car use it is often not backed up by appropriate investment in rural connectivity and that appears to be the case here with the draft plan.

For example, Foynes Port, and the surrounding areas, will see huge growth in the coming years via investment in Floating Offshore Renewables along the estuary and also the longawaited Shannon LNG project. There are currently works underway to use the existing rail line to Foynes for freight from the port, and it is Limerick Chamber's recommendation that this also be used for passenger rail. Therefore, it is appropriate that investment in Foynes and surrounding areas as a hub for energy is backed up by investment in the public transport infrastructure for the people that will be living, working and visiting there.

We understand that many of these areas mentioned above are

Table 1.2: Distance to Cork City (Cork BusConnects)vs Limerick

End Stop:	Distance from Cork City (Km):
Fontainstown	20.4
Crosshaven	21.3
Ballynacorra	24.4
Kinsale	27.1
Mallow	34.6
Trobolgan	38.5
Ballycotton	39.8
Youghal	51.3
Potential Stop:	Distance from Limerick City (Km):
Adare	18.5
Castleconnell	15.0
Croom	21.1
Shannon	23.8
Ballina / Killaloe	24.0
Ballina / Killaloe Rathkeale	24.0 30.9

Source: Authors Own Calculations

covered by the Connecting Ireland plan, however, that raises the question as to why Ardnacrusha and Parteen, both in Co. Clare, are included as part of BusConnects Limerick, when Ardnacrusha and other areas along the route are also part of the Connecting Ireland plan. Limerick Chamber are not advocating for the removal of the Ardnacrusha and Parteen routes, we are asking for a more cohesive plan for the metropolitan area that includes areas outside the core city. We understand that, depending on the area, different buses will be required i.e. buses in the city allowing for standing and no seat belts, while county routes require a different type of bus. But, again, a more cohesive plan that represents a large portion of the metropolitan area, such as Cork BusConnects, would be welcome.

The BusConnects draft plan consultation materials are significantly more user friendly than those under Connecting Ireland and it is easier to understand what routes service what locations. As part of Connecting Ireland, Colbert Station is a primary transport node for county buses, however, this requires people from county towns to travel into the city centre adding further time to their journey. Absolving these areas into BusConnects would allow for people in, for example, Adare to travel to the National Technology Park or other areas without the need to travel through the city centre.

Fig 1.8 and 1.9 outline the potential plan for the city and county as proposed so far, which is likely to introduce time savings for commuters, which is a huge factor in people using public transport over private cars.



Fig 1.8: Proposed Additional Routes

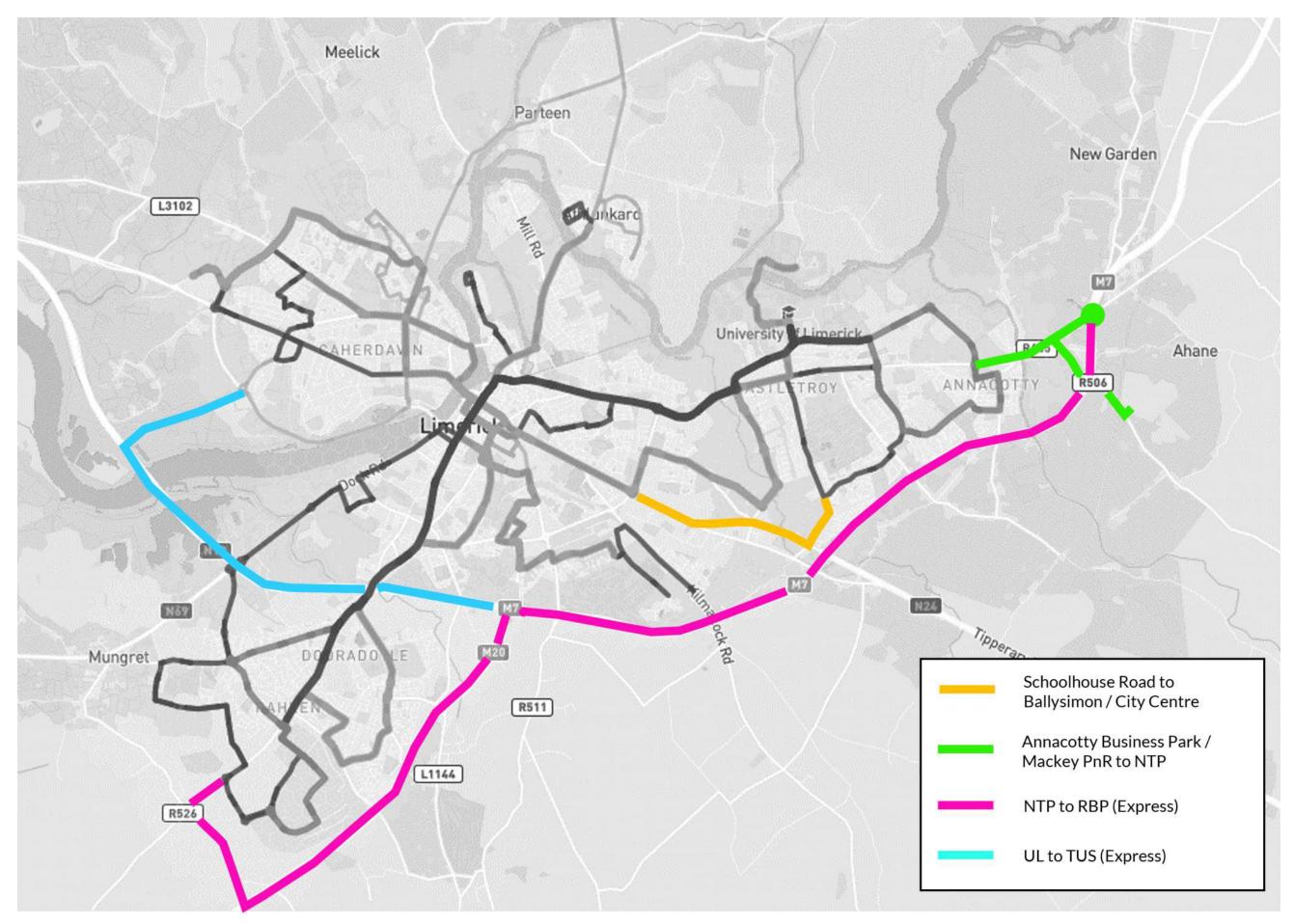
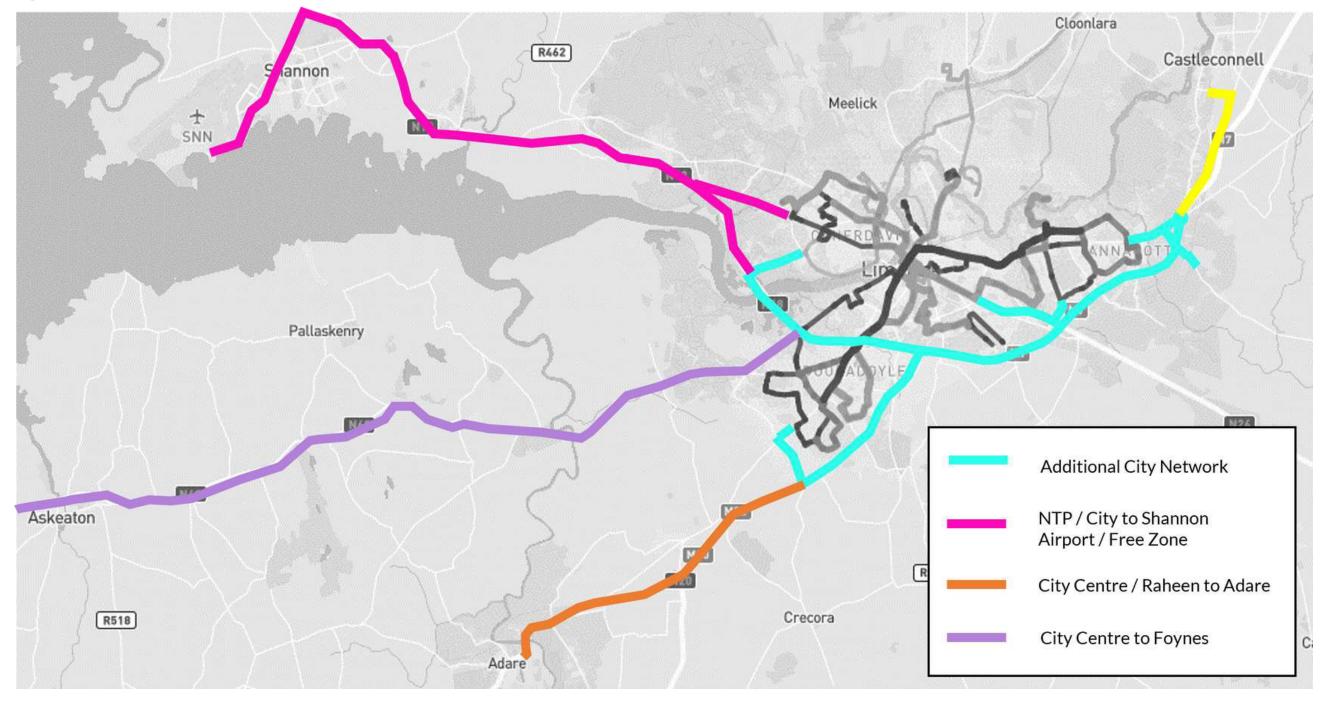


Fig 1.9: Potential Overall Links



Education Access:

As outlined previously, the ability to drop a child off to school as part of an onward journey to work is critical to most parents and families. We ask that the NTA and other stakeholders keep this in mind when designing the final BusConnects plan. Parents not being able to use public transport to drop children off to school and continue on to work will only encourage continued car use.

Limerick has the added value of being home to a number higher education institutions of which BusConnects has huge potential to add to employees, students and visitors commuting experience. We welcome improved connectivity for the Technological University of the Shannon and the University of Limerick North Campus.

As outlined previously, there are no plans in either Connecting Ireland or the draft Bus Connects plan for Limerick to implement a service between Shannon, TUS and UL. This is a missed opportunity and should be rectified.

Technological University of the Shannon: Mid-West (TUS)

Limerick Chamber welcomes the increased connectivity for TUS. The improved connectivity between TUS and the University of Limerick will provide frequent sustainable transport options for both students and employees within Limerick.

The bus route connecting the TUS Moylish campus, the TUS engineering campus in Coonagh and the wider city will give students the opportunity to travel via bus with a frequent service. With many students also living within the vicinity of the area in north Limerick, the frequency of the bus service has potential to reduce congestion at the Moylish Roundabout, which is subject to heavy levels of congestion at peak hours.

Limerick and Clare Education and Training Board (LCETB)

The LCETB operate a campus on the Bawnmore / Kilmallock Road. This campus hosts 400 attendees on a daily basis. The new routes parallel to the campus are welcome, however, there is scope to put a bus stop outside the LCETB campus to make journeys more efficient for students and visitors alike.

Residential Access:

Connecting key residential areas to places of work, school and social related activities will be important to the success of the BusConnects program. The frequency of bus services from key residential areas into the city centre is positive in terms of bringing footfall into the city centre and increasing access through more frequent services. So too are connections between residential areas and key employment and education nodes outside the city, such as the NTP, RBP, TUS, UL, the Dock Road, Ballysimon and the Annacotty Business Park, to name a few. Including bus routes through new developments such as Mungret and Towlerton in Ballysimon is a very positive step as it encourages public transport use from the beginning of the development.

The increased reach of the bus networks for areas of strong population such as Ardnacrusha and Parteen is welcomed in this draft as they are areas of which many residents in the Limerick Metropolitan area commute to work and school and it should help to relieve some of the congestion seen on the Corbally Road at peak hours. However, the draft outlines the plans to reduce the frequency of service into Westbury, a nearby housing estate in the Corbally / Athlunkard area from 30 minutes to 60 minutes. Westbury is home to c. 2,300 residents, many of whom travel to work via the Corbally bridge. This route, currently the 301 route, operates every 30 minutes, stopping at several locations in the housing estate. The frequency of this route is essential to alleviating congestion on the Corbally Road.

University of Limerick (UL)

The improved service to UL is much welcomed in this draft plan. The proposed bus route 2 which goes into the northern part of the UL campus with a frequency of every 15 minutes will serve students travelling for classes, to their accommodation, as well as providing access to the sporting facilities on that side of the campus. The proposed route appears to end just outside the Pavilion and the Irish World Academy of Music and Dance building. Currently there appears to be no traffic infrastructure such as a roundabout to facilitate the turning around of a bus when it reaches its end destination. However, we understand that such infrastructure will be outlined as part of the implementation plan. We encourage the NTA to work with UL in this regard to find an optimal solution. The draft BusConnects plan while focusing on increased frequency, should also focus on decreased travel time. For example, there is the opportunity to provide a route from Schoolhouse Road southwards along the Golf Links Road and onto the Old Ballysimon Road and then into the city centre. The proposed route under the draft plan provides little time efficiencies for those travelling to the city centre and the route along the Dublin Road has significant pinch points in terms of traffic congestion especially at the Groody and Parkway roundabouts, particularly at peak times. Furthermore, there are plans to upgrade the bridge infrastructure at the bottom of Golf Links Road.

The bus service reaching residential areas out in densely populated urban spaces such as Dooradoyle, Raheen and Castletroy are welcomed so too is the frequency.



Ensuring that there is an increase in city centre living is central to the success of the BusConnects program for Limerick. Urban sprawl has decimated Limerick City Centre in recent years, with people opting to live in suburban areas over the city centre. The proposed draft BusConnects plan for Limerick will improve the access and frequency of bus services within the city centre to main employment nodes outside the city centre. However, the improved transport options need to be met with appropriate housing options within the city centre.

The current shortage of housing is causing people to have to travel from further distances to work. This results in a reliance on private car as their primary mode of transport. Ensuring a commute via bus is as convenient as possible will be critical to the uptake in bus journeys. That means buses using the quickest route of travel with minimal stops to encourage use this would be amplified through bus only lanes, which would avoid sitting in traffic where appropriate.

Encouraging people back living in the city centre in tandem with an improved bus service which facilitates frequent services to places of work, school or social will provide Limerick with the best opportunity to achieve a modal shift away from private car usage. The current draft plans outline a strong presence of bus services within Limerick City centre which will enable this.

Transport-oriented Development (TOD):

BusConncects, the N/M20 road improvements and mobility hubs, Park and Ride facilities, and the rail line to Foynes give Limerick a unique opportunity to emphasise TOD at Raheen and the wider city area. As outlined by the National Economic and Social Council (NESC), "TOD is a form of urban development that seeks to maximise the provision of housing, employment, public services and leisure space in close proximity to transport nodes". While BusConnects and the NTA will not be the only organisation carrying out work in this area, it is of critical importance that all state agencies and organisations work together to deliver an optimal outcome for these areas. The added value of adopting a TOD approach in conjunction with Park and Rides is optimising the use of land. Land near transport links is normally of higher value than lands isolated from transport. Park and Rides are often used during workday hours and might remain close to empty in the evening and weekends. Building housing in conjunction with the Park and Ride would allow for an optimal approach to the use of land.

As part of this, a critical aspect is the use of passenger rail options on the Foynes to Limerick rail line, while currently it is being opened for freight only, Limerick Chamber has advocated, and will continue to do so, for this line to be opened to passenger rail.

Overall, the Raheen area has the potential to house a significant number of employees that could walk / cycle to work and other social services, but it also has the transport potential for employees that have to travel further for work. It is an opportunity that should not be missed and the NTA should factor this into their plans for the bus network in Limerick.

Limerick is in a prime position to adopt multiple TOD approaches to service existing residential areas but also build homes on new TOD hubs, this is due to the existing orbital rail line running around the perimeter of the city. The approach suggested for Raheen could easily be replicated in Ballysimon, the Parkway area, the Canal Bank, Corbally and Moyross with Colbert Station in the city centre acting as the primary hub. Not only will this increase housing options by using the existing (disused in some areas) line for passenger will help towards decreasing car use in the city and suburbs (see fig 1.11).

For Raheen, the area meets a number of criteria (Fig 1.10) that are required for a TOD campus; it is within close proximity to major employment opportunities, it has main road access, it is within proximity to a rail line, it will be well serviced under the new BusConnects plan, there is a park and ride facility planned for the area and an accompanying mobility hub as part of the N/M20 project plans, it also has availability of private and public lands.

The last item that is needed is a housing option for employees, this could be either carried out in conjunction with a state agency for homebuilding or else through a strategic partnership with the private sector.

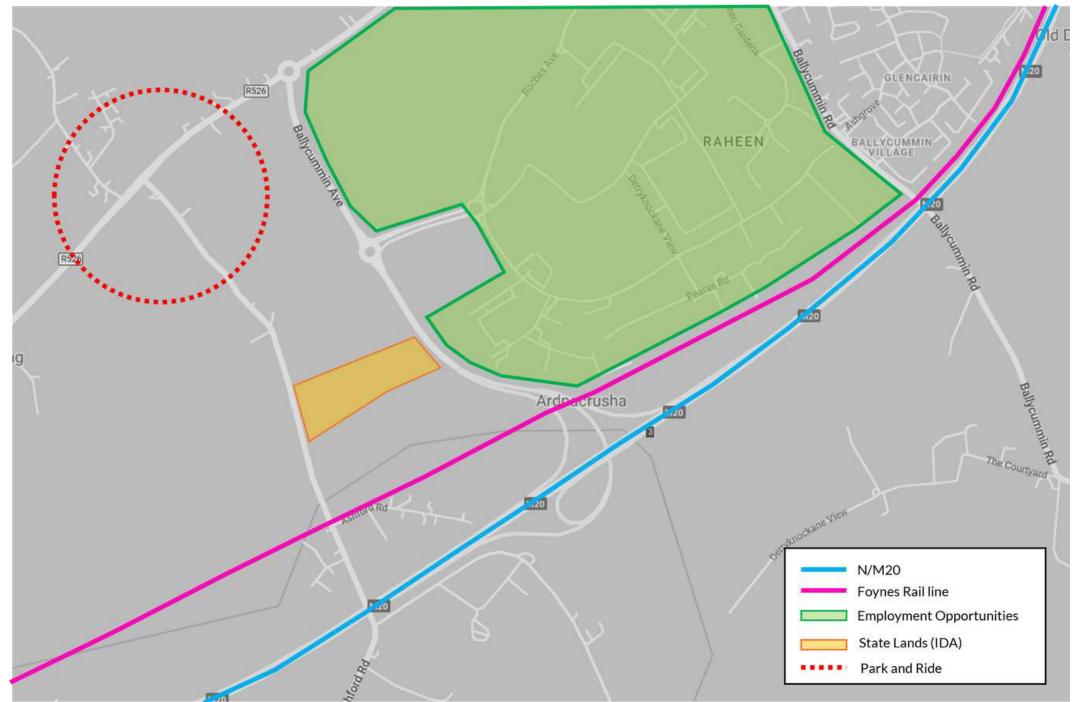
The Focus on Light Rail Transit (LRT):

Limerick Chamber firmly believes one of the most significant projects to improve transport mobility in the Limerick area is to take advantage of the existing rail line. LRT would provide Limerick with the critical mass ability to move people between key areas. Furthermore, it would reduce the reliance on the road network and allow for much easier expansion if future demand required it. Re-prioritising the existing road network to a more public transport approach takes a significant amount of investment in the road network and as we have seen in Dublin and Cork it does not always go as planned due to the constraints of nearby buildings and green space.

While Limerick Chamber welcomes BusConnects and its core goals, using the rail system in Limerick must be a priority. Utilising the Limerick to Foynes line for passengers (as well as freight) would be a good starting point, this is something that Limerick Chamber advocated for in our submission to LSMATS. However, much of the orbital rail line is single track only and would likely take significant investment to make it a dual track line and also improved electrification potential. Nonetheless, it represents a significant opportunity.



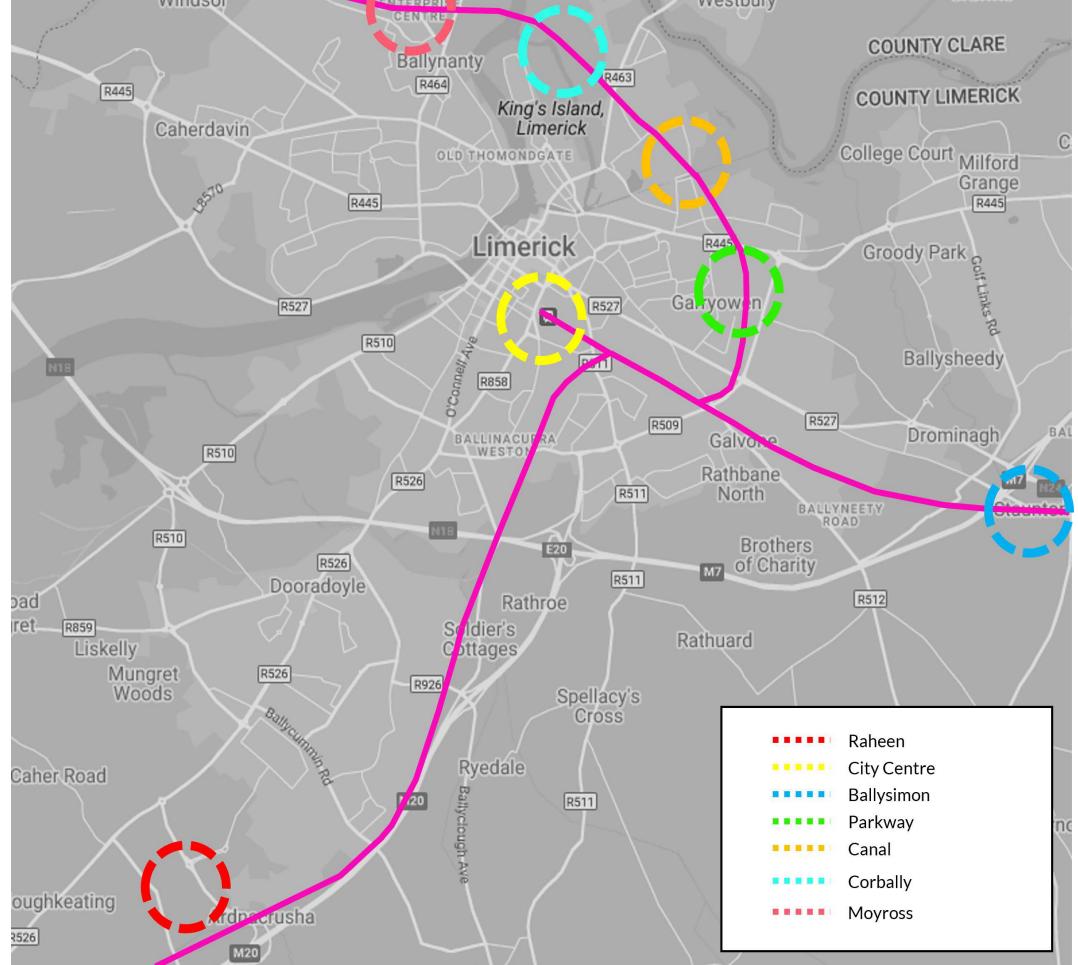




Map is for illustrative purposes only and may not reflect any final plans or ownership



Fig 1.11: Passenger Rail Potential and TOD Hub Network



Map is for illustrative purposes only and may not reflect any final plans or ownership

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Park & Ride:

Under the LSMATS National Strategic Objective (NSO) 4, it outlines the provision of Park and Rides in association with BusConnects. However, the draft BusConnects Plan includes no guidance on the location of these Park and Rides. There needs to be a co-designed and cohesive plan to show how the bus system will work with these park and rides. While LSMATS does include "Indicative Strategic Park and Ride Locations" it is unclear whether these remain the same for BusConnects. For example, taking the indicative park and ride locations and overlaying them on the Draft BusConnects Plan outlines that two of the four indicative Park and Ride locations will not be serviced under BusConnects currently (Fig 1.12). Furthermore, for park and rides to be a success there must be a dedicated bus lane to bring people where they need to go or else they will be stuck in congestion on a bus, rather than a car, which does not represent an attractive or efficient transport option - this should be a core consideration for the final BusConnects plan.

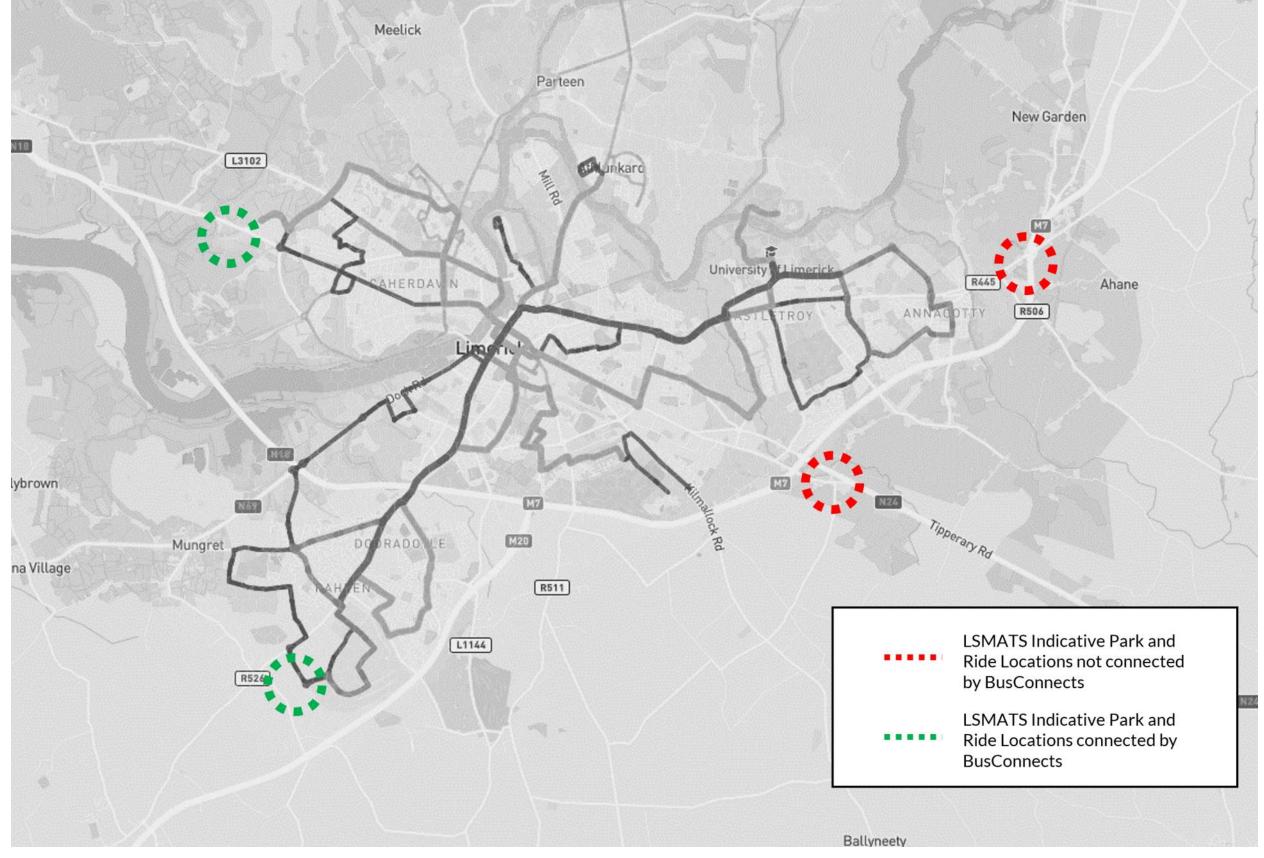
However, we note the NTA's commitment to increase bus routes as part of BusConnects once Park and Ride plans are more advanced - having sight of this in advance would be beneficial from an employer perspective.

Biodiversity and Health:

There have been numerous reports about biodiversity loss as a result of implementation of BusConnects programmes in Dublin and Cork. Reports for Dublin outlined that under BusConnects plans in 2020, there would be the removal of almost 2,500 trees along the routes. In Cork, there was a proposal to remove a woodland green area in Douglas and replace it with a bridge. While the Limerick draft plan lacks detail in terms of any removal of trees or other green space. Limerick Chamber would ask that past mistakes seen in other counties are not repeated in Limerick. Now is a time for planting more trees and creating more green spaces, not removing them.

Trees, green areas and biodiversity at large are very important from a public realm and placemaking perspective. But it is also hugely important from a public health perspective (along with the removal of emissions) for those living in urban areas. In past years, the HSE had outlined that Ireland has the fourth highest rate of asthma in the world. There is a plethora of research into the positive benefits of trees in urban areas, from providing cooling, moderating the local climate, improving air quality and providing mental health benefits.

Fig 1.12: Park and Ride Locations (LSMATS) and Draft Bus Connects Route





Conclusion

The BusConnects plan for Limerick represents a significant opportunity to overhaul the city's public transportation system by providing increased connectivity, reliability, and sustainability. Limerick Chamber commends the work undertaken by the NTA in achieving the goals outlined above. Businesses and organisations, particularly in some areas of the suburbs, will benefit greatly from increased access and frequency for buses. However, for some other areas and businesses, the draft plan is seen as a missed opportunity particularly for those businesses located in the Annacotty Business Park.

It is important, for all future transport and housing plans, that they are designed with Transport-oriented Development (TOD) in mind. Not only is this important from a housing provision perspective but it is equally important to use land in strategic areas attached to transport nodes where people can either walk or use public transport to get to their destination. Our case studies in this report outlined how it could work in Limerick, but it needs input from all organisations, such as private and public homebuilders and not just transport organisations.

There are outstanding concerns and questions about how the draft plan will influence existing use of roads, cycle lanes and areas adjacent to the road network. This detail is not provided for in the draft plan and will require further engagement with businesses, residents and other stakeholders.

For some time, businesses in the city centre have been asking for an appropriate traffic and delivery strategy. This appears to be accounted for in the 'Limerick City Transport Study', however, there is no time for delay on beginning the study. While we note the study will be completed prior to the implementation of BusConnects, there should be an interim strategy in the meantime to account for existing issues experience in the city centre. Businesses believe that the removal of car access into the city centre will result in increased congestion on other smaller roads which could act as a disincentive for people to visit the city centre. Furthermore, given the proposed scheduling of buses there is a very real opportunity where this could result in bus congestion on the city's main street, which is often seen along the Quay's in Dublin. However, Limerick Chamber has put forward an alternative strategy as part of our submission which would see a more shared space in the city centre.

For bus transport to be attractive, particularly to car users, it should be time efficient. While Limerick Chamber appreciates the radial approach undertaken in the draft plan, bringing people through the city centre, when it is not their end destination, will add time to their journey which could act as a disincentive for undertaking the journey by bus and add further congestion to the city centre. In this regard, it would be appropriate to investigate the potential for orbital routes particularly between employment and residential nodes. The same holds true for routes with many stops in between two key points, many stops, adding to the time of the journey could act as a disincentive for users. In this regard, it would be appropriate to investigate the potential for express routes between key residential and employment nodes.

In conclusion, increased access to public transport in Limerick City is a critical business need that must be addressed through effective transportation planning. The BusConnects draft plan is an important step towards achieving this goal, as it aims to improve the efficiency, reliability, and accessibility of public transportation in the city. The plan provides a blueprint for a comprehensive network of bus routes, with a focus on reducing journey times and increasing frequency of service.

Businesses in Limerick stand to benefit significantly from the implementation of the BusConnects plan, as improved public transportation can facilitate easier access to employment, education, and other essential services. Additionally, businesses can reduce their reliance on personal vehicles, which can lead to cost savings and a reduction in traffic congestion.

Overall, the BusConnects Draft Plan represents a significant opportunity for businesses in Limerick to improve their operations and contribute to the city's economic growth. As such, it is important that all stakeholders continue to support and work towards the implementation of this critical transportation initiative.

Again, Limerick Chamber would like to thank the NTA for the hard work undertaken on the plan so far as well as the open and collaborative nature of the consultation process.

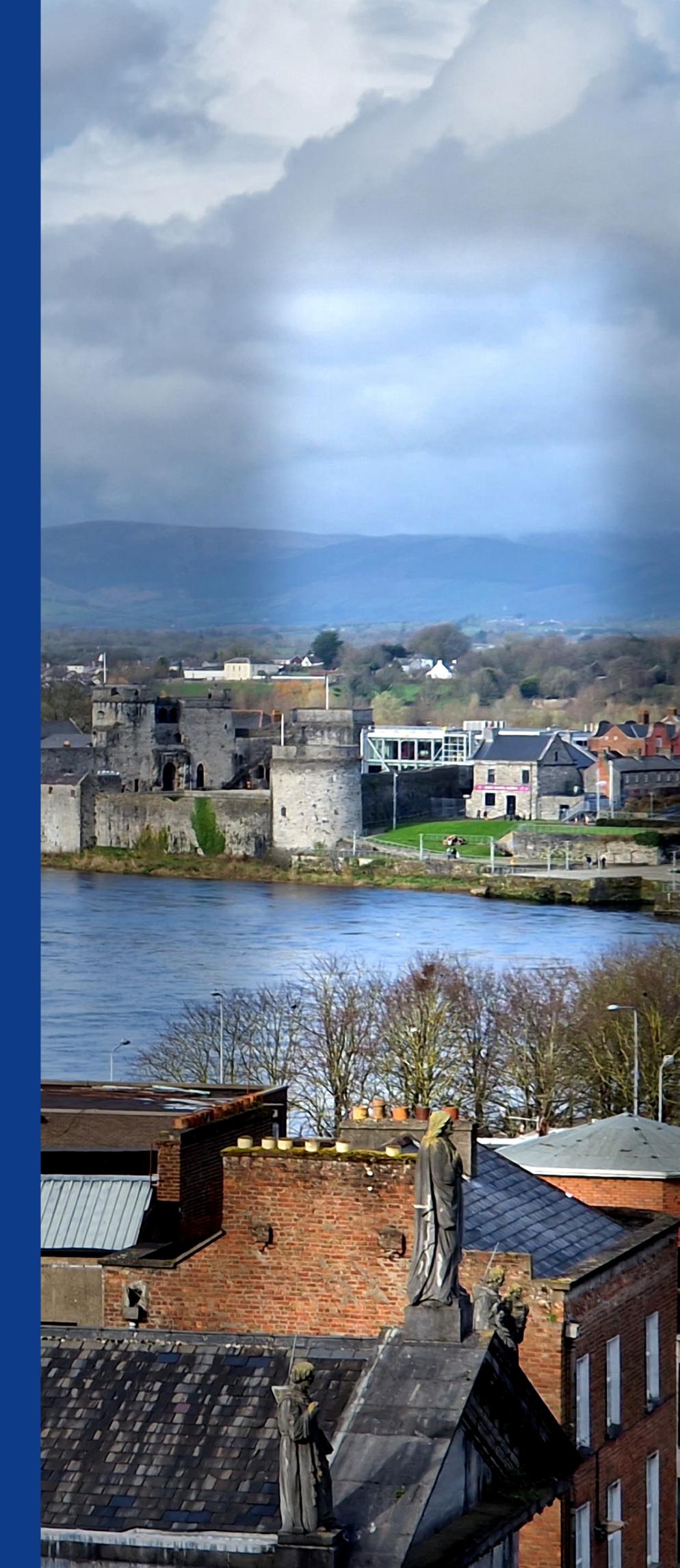


Key Asks / Recommendations



Operational Changes to City Centre





A Cohesive County & Region Plan

A Mobility Study for City Centre Users

Greater Focus on Park and Rides and TOD





Limerick Chamber Advancing business together

Appendix 1: Annacotty Business Park BusConnects, Public Transport Survey

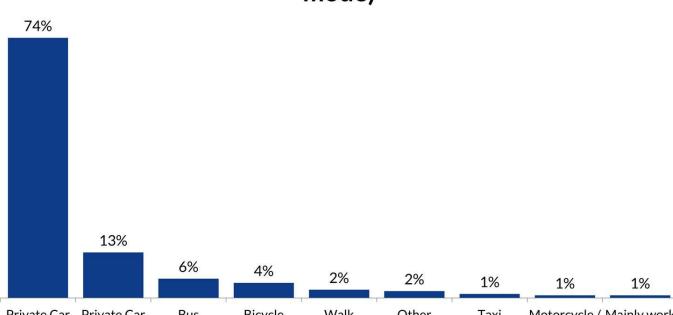
A part of our consultation with Limerick Chamber members in relation to BusConnects, we carried out a number of surveys. While most key employment nodes within the city area are covered with some element of bus provision, there is a large gap surrounding the business and employees of Annacotty Business Park. For Annacotty Business Park, the total number of respondents for the survey were 254. The results of the survey, outlined below, provide significant support for the provision of a bus route to the park.

The purpose of the survey was to estimate demand and potentially but forward a business case for the provision of a bus route to the park as part of BusConnects.

The findings of the survey provide some interesting results and overall lend support to the provision of a bus route to the park, from a demand perspective.

Currently, 87% of survey respondents travel to the park via private car. The next most popular option was bus (6%) however this results in long walking times to the park. Providing a bus service to the park will directly align with Government Policy by When asked what public and active transport routes respondents would like to see to the business park, 94% outlined the desire for a bus route, 30% for cycling infrastructure and 32% for improved walking infrastructure.

Ultimately, 80% of respondents outlined that they would be willing to use the bus if an appropriate route was provided to the business park with a further 12% remaining undecided. Just 7% of respondents said they would not use the bus route.



How do you usually travel to work? (Primary mode)

removing the number of people travelling by private car and providing more sustainable transport options.

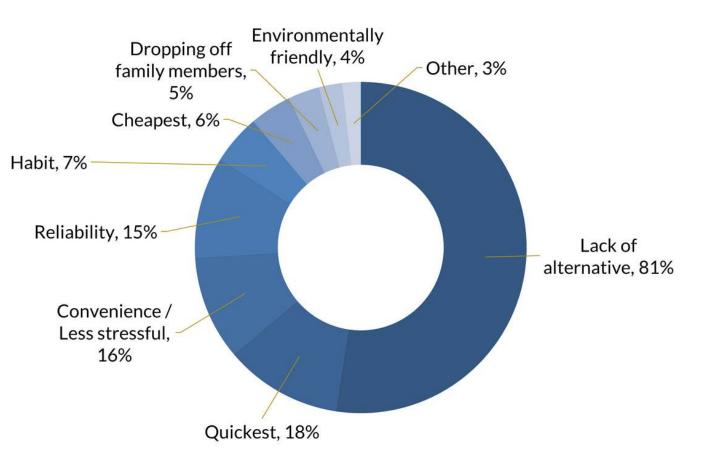
When asked why they travelled by that mode of transport, 81% of respondents outlined that this was because of a lack of alternative. The other most popular options were quickest (18%), Convenience (16%) and Reliability (15%) all of which can be rectified by providing an appropriate bus route to the park. Interestingly, just 5% choose their mode of transport based off dropping children to school or other family members along the way.

89% of respondents live more than 5km away from Annacotty Business Park, which makes the provision of a bus service more important as it can transport people longer journeys when compared to shorter journeys that could be facilitated by active travel. For most employees (47%) it takes on average 16 to 30 minutes to get to work.

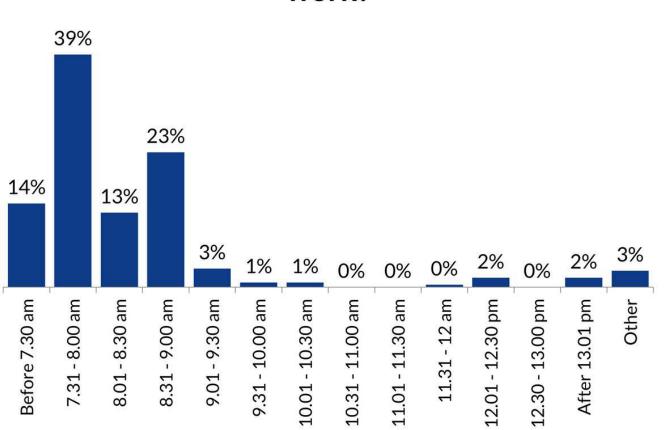
The vast majority of respondents arrive to the park between 7.30am and 9.30am (75%) while 74% of workers usually leave the park between 4:31pm and 6:00pm. However, we do note that shift employees in the park work outside these hours and should also be accommodated.

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(Sole	(Lift /				(please		scooter	from home	
Passenger)	Carpool)				specify)				

What is your reason for choosing that mode of transport?



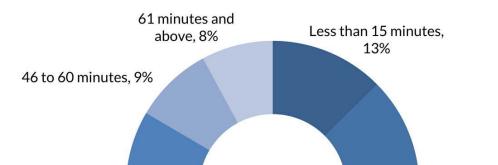




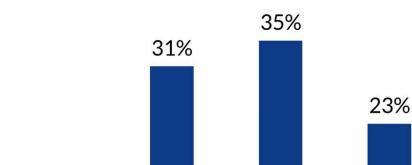
What time do you usually arrive at work?

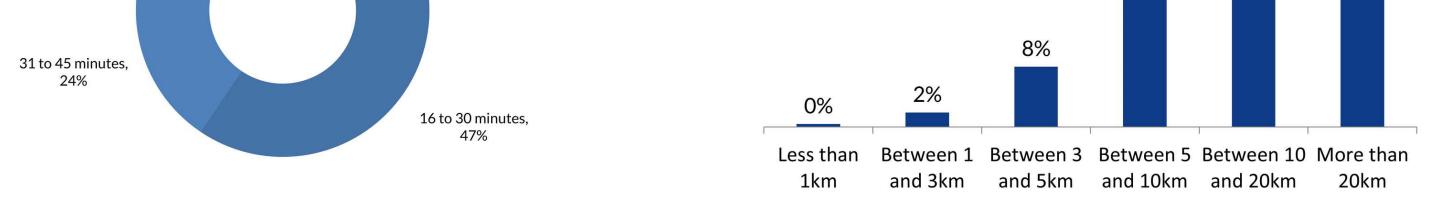
What time do you usually leave work? 37% 18% 18% 9% 5% 3% 2% 2% 2% 2% 2% 0% Other Before 3.30 pm 7.01 - 7.30 pm 3.31 - 4.00 pm 4.01 - 4.30 pm 4.31 - 5.00 pm 5.01 - 5.30 pm 5.31 - 6.00 pm 6.01 - 6.30 pm 6.31 - 7.00 pm 7.31 - 8.00 pm After 8.01 pm

How long does it usually take you to get to work?

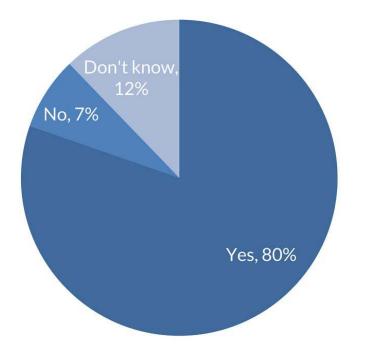




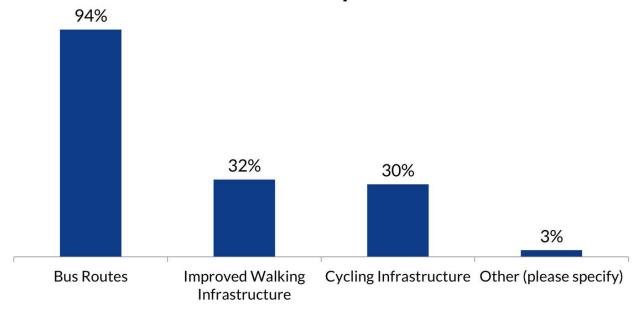




If a bus route was available to the business park, would you use it?



What type of public and active transport options would you like to see to the business park?



Note: In some instances, respondents were given the option to select multiple answers. Therefore some graphs add up to greater than 100%.





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