



**Limerick
Chamber**
Advancing business together

Limerick City Centre Transport Plan

Limerick Chamber Submission to Draft
Limerick City Centre Transport Plan (LCCTP)
October 2026

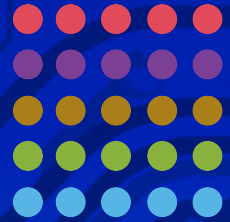




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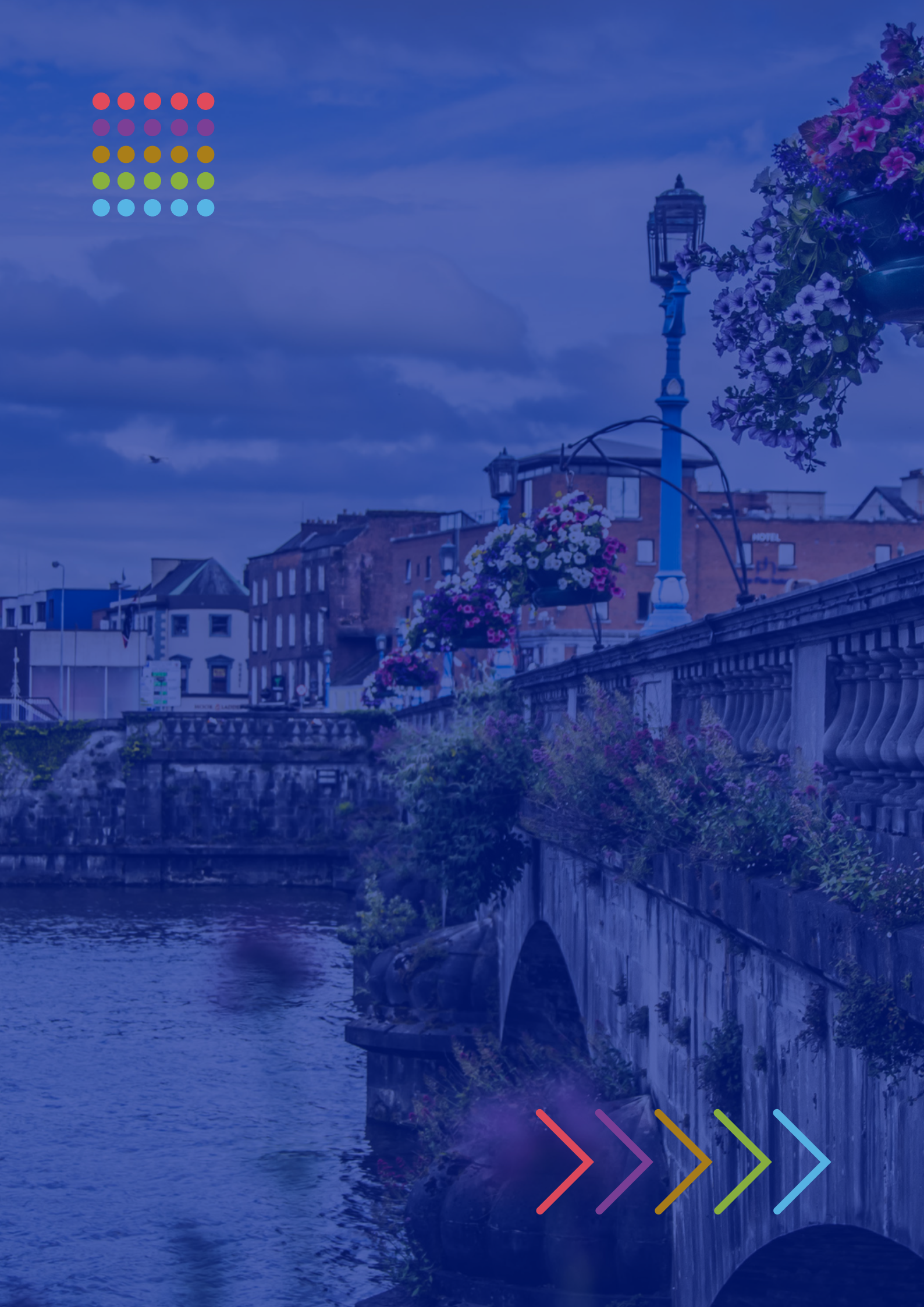
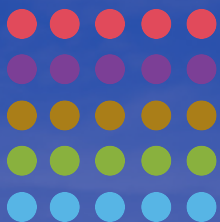
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Primary Areas of Concern



Lack of Appropriate Economic Focus

There is a disconnect between the plans vision and objectives. The vision and strategy call out the desire for economic growth, however objectives 1 - 7 fail to designate economic development, growth, retail vitality etc. as an standalone measurable objective. Limerick Chamber believes that this is a missed opportunity and it should be introduced in the final plan. We also believe given the lack of focus on economic impact as part of the Multi-criteria analysis, that an expanded economic impact assessment should take place. We believe that by undertaking an EIA that Limerick City and County Council as well as the National Transport Authority can lead from the front utilising a fully evidence-based approach prior to implementation.



No Modelling of City Entry Points

It is perplexing that key approaches and entry ways to the city were not modelled as part of the study. This is a large cause for concern given the potential congestion the new layout could possibly cause at these approaches, which ultimately could act as a disincentive for people travelling to the city. Combined with this is the potential for busses to be caught in this congestion given many of the areas do not have bus lanes, thus there is a concern around the potential for increased journey times on bus transport.



Exclusion of Parking & Delivery Strategies

For a comprehensive plan to be deployed, it must consider all elements of the city. While we welcome the consultation, to ask people to consult and give views on a large transformational plan without including two critical aspects of urban centres, being deliveries and parking, means there will be large gaps in the final plans approach. Limerick Chamber views that these should form core parts of the draft plan and not be treated as an after thought once the plan has been decided.



Priority Recommendations

- 01 Economic Vitality**
Economic vitality should be an explicit goal and one of the core measures of success. An economic impact assessment should be undertaken as well as assessing impacts on footfall, expenditure, employment, occupancy and ultimately competitiveness

- 02 Modelling Area**
The modelling area should be expanded to include key approaches, entry ways and junctions to the city centre. There should be a test within the modelling is key transport projects are delayed and not delivered within the 5-year phasing of the transport plan.

- 03 Developing an Integrated Parking & Delivery Strategy**
For a comprehensive transport plan for the city centre this should be included as part of the drafting and consultation process.

- 04 Credible Alternatives**
The plan hinges on behavioural change, behavioural change is dependent on workable alternatives. Alternatives should be in place prior to any changes.

- 05 Protecting Accessibility**
Many businesses are concerned with the lack of detail for retaining access to those travelling from areas without a bus network. Or for clients of businesses that have mobility issues and require drop off points closer to their desintation.

- 06 A Blanket Approach**
Many businesses see the draft plan as treating the city centre solely as a transport network. There is a desire for the plan to be flexibile enough to play to each districts offering and strength while also being cognisant of the change in focus of the street at different times of the day.

- 07 Phasing, Funding & Delivery**
Given the operational changes proposed in the plan, as well as concern around further capital works on O'Connell and potential disruption there is a desire from businesses to have greater clarity around phasing, funding and delivery prior to the plan being finalised.

- 08 Monitoring**
There is a strong desire for the monitoring and publishing of KPIs as part of the plan, with businesses advocating for using the data for further investment or changing approach when desired KPIs are not being achieved.



Introduction & Overview

Limerick Chamber supports the ambition to create a more accessible, attractive and sustainable city centre. Improvements to public transport, pedestrian safety, cycling infrastructure and the public realm can strengthen Limerick's appeal as a place in which to live, work, visit and invest. Chamber members broadly support these objectives, but believe that their delivery must be underpinned by robust evidence, credible transport alternatives and a clear understanding of how the city centre economy operates. Limerick Chamber believes that there are significant gaps between ambition and basis for delivery - which must be rectified.

The Chamber cannot support the implementation of significant changes to city centre access and traffic circulation without greater assurance that the measures will strengthen, rather than inadvertently weaken, the economic vitality of the city.

The Draft Plan's vision refers to supporting economic growth, but economic growth is not included among its numbered objectives. Similarly, the economic assessment applied through the multi-criteria analysis appears to focus principally on enhanced public realm provision rather than measurable economic outcomes such as footfall, expenditure, employment, business occupancy or investment.

This is the central weakness of the Draft Plan. The city centre is not simply a transport network. It is a regional employment, retail, hospitality, services, education and cultural destination. Changes to how people access and move through it may influence customer behaviour, journey reliability, business costs, employee access, evening activity and

investment decisions. These effects should be assessed explicitly before the preferred option is approved or implemented.

The Chamber's three principal concerns are therefore:

- The absence of a comprehensive economic impact assessment and a sufficiently strong economic focus within the Plan.
- The limited geographical scope and transparency of the transport modelling, particularly in relation to key approaches and entry points to the city.
- The absence of integrated parking, loading, servicing and delivery strategies alongside the proposed traffic changes.

The Chamber is particularly concerned that the modelling extends only to the study area and excludes analysing impacts at key city approaches and junctions, including Parkway Roundabout, Tipperary Roundabout, Roxboro Roundabout, the junction of Ballinacurra Road and Childers Road, Dock Road Roundabout and O'Connell Avenue.

Without this wider network assessment, it is not possible to determine confidently whether the Plan will reduce traffic and congestion or primarily redistribute them to surrounding routes and communities thus creating bottlenecks at key entry points to the city.

The omission of operational parking and delivery strategies is also a significant deficiency. The Draft Plan proposes substantial changes to access, circulation and on-street parking but leaves the detailed management of parking, deliveries and servicing to a later stage. These issues are fundamental to the functioning of the city and should be planned concurrently, not addressed after core transport decisions have been made.

Members are also concerned about the sequencing of implementation. Changes that discourage or complicate private-vehicle access should not precede the delivery of credible alternatives, including BusConnects, park-and-ride facilities and dependable public transport services. The Draft Plan refers to phased implementation, while the Chamber's briefing identifies uncertainty regarding how implementation will align with the expected timeframe for BusConnects.

Accordingly, Limerick Chamber recommends that Limerick City and County Council and the National Transport Authority (NTA):

- Make economic vitality an explicit objective and one of the core measure of success
- Complete and publish a comprehensive economic impact assessment before implementation
- Expand the modelling area to include key entry routes, junctions and surrounding communities
- Prepare integrated parking, loading, servicing and delivery strategies as part of the Plan
- Deliver credible public transport and park-and-ride alternatives before introducing material access restrictions
- Set out a clear implementation programme covering phasing, funding, dependencies and timelines;
- Publish monitoring results; and retain the flexibility to amend or reverse interventions where outcomes do not meet agreed objectives.

The Chamber is seeking a stronger Plan, not the abandonment of its underlying ambition.

A city-centre transport strategy will command greater confidence when the city centre is treated than more than just a transport network where sustainability, accessibility and economic vitality are treated as mutually reinforcing objectives and where implementation is evidence-led, sequenced and adaptable.

Economic Impact & the Role of the City Centre Economy

ECONOMIC VITALITY MUST BE ONE OF THE PRIMARY OBJECTIVES

The Draft Plan's vision includes support for economic growth and refers to maximising Limerick's competitive advantages. However, economic growth is not identified among the Plan's numbered objectives. The Chamber considers this omission material, particularly for a Plan that proposes significant changes to access, circulation, parking and the operational use of commercial streets.

Economic vitality should be elevated to the same level as transport efficiency, safety, active travel, public transport and environmental improvement. It should be an explicit objective against which each intervention is assessed.

That objective could include measurable outcomes relating to:

- Footfall;
- Expenditure;
- Employment and employee access
- Retail, hospitality and evening activity
- Occupancy and vacancy
- Commercial investment;
- Customer catchment and accessibility
- The competitiveness of Limerick relative to alternative retail, employment and leisure destinations.

A COMPREHENSIVE ECONOMIC IMPACT ASSESSMENT IS REQUIRED

The Chamber's principal concern is that the Draft Plan does not contain a sufficiently comprehensive examination of its potential economic effects. The multi-criteria analysis includes an economic heading, but the principal identified output appears to be an increase in public realm provision rather than a direct assessment of economic activity, expenditure or footfall. Of course, public realm improvements can support economic development, but they are not a substitute for economic analysis.

The assessment should examine how changes in access, route choice, journey time, parking availability and delivery arrangements may affect different sectors and parts of the city at different times of day.

BALANCED USE OF EVIDENCE

The gaps in provision of information and reasoning for such is also a concern; for example, the draft transport plan continually references data from an NTA commissioned 2024 report entitled "*Limerick City Centre Shopper Survey*". The draft plan outlines the average spend of bus users in the city centre as €58.62, the general average spend of €64.62 but the draft plan fails to mention the average car user spend of €78.62 - the Chamber would question this omission.

The Chamber is not suggesting that expenditure by travel mode should determine transport policy in isolation. However, all relevant evidence should be presented transparently and assessed fairly. Selective presentation risks understating the role that different modes currently play in supporting the commercial city centre.

GROWTH RATHER THAN REDISTRIBUTION ALONE

The Draft Plan's modelling indicates no material increase in overall travel demand to the city centre stating "*the 2030 modelling indicates no material increase in overall travel demand to the city centre, with changes primarily reflecting a redistribution of existing trips across modes rather than traffic growth.*" The Chamber believes this raises a fundamental strategic question. A city centre transport plan should not be concerned solely with how existing trips are redistributed. It should also support an increase in the number of people choosing to work, shop, study, visit and spend time in the city centre. The Plan should establish an explicit ambition to grow sustainable access to the city centre while maintaining its appeal as a regional destination.

Recommendation

Undertake Economic Impact Assessment and expand multi-criteria analysis beyond provision of public realm

Transport Modelling and the Wider City Network

STUDY AREA MUST REFLECT ACTUAL TRAVEL PATTERNS

The Chamber is concerned that the modelling area is too narrowly focused on the city-centre core and does not provide a sufficiently complete assessment of the routes through which people enter and leave the city.

Particular attention is required at:

- Parkway Roundabout;
- Tipperary Roundabout;
- Roxboro Roundabout;
- The junction of Ballinacurra Road and Childers Road;
- Dock Road Roundabout;
- O'Connell Avenue; and
- Other routes connecting the city centre with suburban, regional and rural catchments.

The Plan proposes to redirect traffic and make some journeys through the commercial core less direct. The principal question is whether this will reduce traffic or transfer congestion further out to the entry points of the city - excluding such analysis in the draft plan is a huge cause for concern as ultimately it could lead to levels of congestion at entry points that act as a disincentive to visit the city centre. Furthermore, there are no bus lanes at many of these entry points meaning that buses will also be caught up in any potential congestion thus potentially increasing journey times.

MODELLING INPUTS AND ASSUMPTIONS MUST BE TRANSPARENT

Members identified a perceived lack of information on origin-destination movements, modelling assumptions and future-year demand. The modelling within the draft plan also references projects and services that were not complete at the time of the assessment, including the M21/N69 Limerick to Foynes Road, the N24 Cahir to Limerick Junction scheme, park-and-ride facilities and BusConnects services.

The final assessment should clearly distinguish between:

- Existing infrastructure and services;
- Committed projects;
- Assumed future projects;
- Infrastructure without confirmed delivery dates;
- Baseline traffic demand; and
- Future-year demand and growth assumptions.

Results should be published for scenarios in which major assumed projects are delayed or do not operate as anticipated.

POTENTIAL CASE STUDIES

Some members expressed particular concern about converting constrained streets to two-way operation. Where road width is limited, a delivery vehicle, refuse truck, breakdown or other temporary obstruction could reduce capacity and generate congestion across the surrounding network. The existing one way systems, allows a the potential use of the other parallel lane for use around the obstruction.

Members have highlighted the positive changes to the transport system that have been brought forward in Nenagh, Co. Tipperary in recent years highlighting that it may be worth examining in a Limerick context.

Recommendation

The modelling should be expanded before the preferred option is finalised to include key entry points to the city.

Parking, Loading, Deliveries & Operations

A PARKING STRATEGY SHOULD ACCOMPANY THE PLAN

It is not sufficient to undertake a parking (or delivery strategy) after the draft plan has been published. To provide a comprehensive city centre plan parking and delivery strategies should be completed in tandem with the overall plan.

The Draft Plan proposes material changes to on-street parking and traffic circulation while deferring a parking management review. The Chamber considers this a missed opportunity. Parking policy is integral to access, customer behaviour, employee travel and business operations and should be addressed as part of the same decision-making process.

Undertaking a parking strategy after publishing the draft plan relegates the importance of parking to an after thought being led by the draft plan rather than informing each other and utilising an evidence-based approach.

DELIVERIES AND SERVICING CANNOT BE DEFERRED

The Draft Plan acknowledges that access for deliveries is critical to the city centre but fails to include a strategy focusing on such. While in certain instances the draft plan states local access will be retained, it does not explain how this will operate nor does it appear to have engaged with organisations that rely on such services.

The Chamber considers the absence of a delivery, loading and servicing strategy a fundamental omission. The proposed changes affect how businesses receive goods, arrange collections, remove waste, maintain premises and accommodate service vehicles. These are not secondary implementation details. They are essential components of a functioning commercial centre.

The strategy should be developed with direct input from city-centre businesses and should recognise that different sectors operate at different times and have different servicing requirements.

ACCESSIBILITY AND REGIONAL CUSTOMERS

Members emphasised that not all customers and employees live in areas served by a practical public transport network. Regional and rural access, short-stay trips and the requirements of older people and people with disabilities must be explicitly considered.

The Chamber supports greater use of sustainable transport, but modal change must be enabled through attractive and reliable alternatives. It should not be pursued solely by making existing journeys more difficult where no reasonable alternative is available.

Recommendation

Integrated parking, delivery, loading and servicing strategies should be prepared, consulted upon and published in conjunction with the draft plan to ensure that they get the attention and priority that is required.

Public Transport, BusConnects and Park & Ride

The success of the Draft Plan depends on behavioral change. Behavioral change depends on the availability of credible alternatives to private-car journeys. The concern currently is the delay in BusConnects and lack of current Park & Ride facilities.

Members support improved public transport, but are concerned about the sequencing of road changes relative to the delivery of BusConnects and park-and-ride facilities.

The Chamber requires greater clarity on:

- How the proposed road network will support the BusConnects network;
- The meaning of bus priority where buses and general traffic share routes;
- Whether proposed arrangements will support targeted bus journey times;
- The delivery programme for park-and-ride;
- The treatment of journeys originating outside the urban public transport network; and
- The measures that will operate before the full public transport network is in place.

Transport alternatives must be sufficiently frequent, reliable, safe and convenient to change established travel behaviour. Park & ride should be treated as essential enabling infrastructure rather than a separate or subsequent intervention. Access restrictions or substantive changes that reduce route choice should not be introduced ahead of the alternatives upon which the Plan's success depends.

Recommendation

The final Plan should include a sequencing framework that links each material traffic or access change to the delivery of the relevant public transport, active travel or park-and-ride alternative. While also encouraging the provision of alternatives prior to operational changes.

Planning Around How the City Functions

The city centre is made up of streets and districts with different economic and social functions. Retail areas, hospitality locations, residential streets, office districts and transport corridors do not operate in the same way or at the same times. While some of this is acknowledged in the public realm strategy the transport strategy treats the city centre as a transport network rather than an urban core where people live, work, do business and socialise.

Members are concerned that a uniform transport approach could disregard the established role and practical requirements of individual streets particularly at different points in the day.

Members also highlighted the need to coordinate transport interventions with investment in existing footpaths, road surfaces and the wider public realm. The plans focuses on “new” infrastructure, with members being concerned regarding the condition and maintenance of existing infrastructure.

The Chamber supports public realm investment where it enhances accessibility, dwell time and commercial activity. However, public realm proposals and transport changes should be coordinated to minimise repeated disruption and ensure that businesses remain visible and accessible during works.

There is huge concern from businesses along O’Connell Street that were severely disrupted during previous O’Connell Street works - businesses need clarity around what proposed works are due to take place along O’Connell Street and will need reassurance around the implementation. The transport plan fails to adequately address these concerns and the public realm plan images outlined a significantly different O’Connell Street that could incur significant works.

Recommendation

Street-level interventions should be tailored to the established and intended role of each area, supported by local operational plans and developed through engagement with affected businesses and residents.

Phasing, Measurement and Adaptability

While the draft plan considers itself strategic rather than operational - the plan proposes operational changes to streets and thus, in the view of Limerick Chamber, goes beyond high level strategy and is more of an operational plan.

Because of this, there is an expectation from businesses that the draft plan should provide sufficient clarity on overall phasing, funding, delivery timelines or the data that will be used to assess outcomes.

That distinction should be resolved. If the Plan is strategic, individual measures should be subject to further assessment and consultation. If it is operational, considerably more implementation detail is required before approval.

The Chamber supports the use of successful early interventions to build the case for further investment. Equally, measures that do not achieve their objectives, or that cause material unintended consequences, should be reviewed and adapted promptly.

Recommendation

The Council should publish a detailed implementation and monitoring framework before works begin, including phasing, timelines, funding, dependencies, baseline data and review mechanisms.



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