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



From Better Ennis

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Email: betterennis@activetravel.ie

Better Ennis is an independent community group focussing on the impact of the built environment on public health, based in Ennis, Co. Clare.

Better Ennis welcomes the opportunity to submit our feedback on the Limerick Shannon Metropolitan Area Strategy 2040 (LSMATS).



Introduction

“The overarching principle of the protection of the environment combined with an impetus to improve social equality, will serve to guide us in our endeavour to copper-fasten and safeguard our future”
- Mr. David Kelly, Director, Southern Regional Assembly, *Regional Spatial & Economic Strategy for the Southern Region.*

The National Planning Framework sets the context for the Regional Spatial & Economic Strategy (RSES) through 10 National Strategic Outcomes (NSOs).

It is notable that, to varying degrees, LSMATS does not align with or is in conflict with eight of the ten NSOs.

- **Compact Growth**
- **Enhanced Regional Accessibility**
- **Strengthened Rural Economies and Communities**
- **High-Quality International Connectivity**
- **Sustainable Mobility**
- **A Strong Economy Supported by Enterprise, Innovation and Skills**
- **Enhanced Amenities and Heritage**
- **Access to Quality Childcare, Education and Health Services**

NSO: Compact Growth

Compact Growth involves careful management of sustainable growth of compact cities, towns and villages to achieve better residential development across the Southern Region. (RSES)

“Regenerate and develop existing built-up areas attractive and viable alternatives to greenfield development” - RSES Key Principles

- The inclusion of the Northern Distributor Road (NDR), despite its description as a multi-modal road, is at odds with the RSES key principles and sustainable development best practice by opening up urban sprawl and perpetuating private car dependency. We would like to see the Northern Distributor Road omitted from the redraft of the strategy.

Although the NDR is included in the RSES, the RSES itself is now outdated in referencing the Climate Act of 2015 and Climate Action Plan of 2019, and not aligned with the revised and more ambitious national targets as outlined in the Programme for Government and international EU targets. It will also need to align with the new Climate Bill.

- As outlined in the RSES, “between 2006 and 2016 the highest rates of population increase were in commuter areas near to Cork and Limerick Cities and in areas close to other larger settlements. Population decline was also experienced, primarily in rural and peripheral areas, with the largest decreases recorded in areas of Clare, Kerry, Limerick and Cork.”

In order to ensure that we are achieving compact growth and reversing the decline in population we need to improve the liveability of our current urban centres. The RSES states that “Equally the focus must be on ensuring a balanced approach and realising the much-underutilised potential in wider rural towns and dispersed communities. There is a key focus on strengthening our smaller towns and villages as well as rural areas.” This further negates the need for the Northern Distributor Road and the proposed SDZ development if we are to strengthen our smaller towns and villages in County Limerick and County Clare.

- The RSES indicates that to achieve compact growth, that regions should “Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling, identify brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets” and the MASP “highlights the need to increase residential density in Limerick City and Shannon through a range of measures including, reductions in vacancy, re-use of existing buildings, infill and site-based regeneration.” We believe the proposed Northern Distributor Road is at odds with this approach and not required, given the existing potential already within the urban centres of the area and is a poor use of land resources.

NSO: Enhanced Regional Accessibility

Enhanced Regional Accessibility is key to the delivery of the NPF, which aims to enhance accessibility and connectivity between the key urban centres and their regions. (RSES)

- The LSMATS does not demonstrate a clear strategy to reducing private car dependency in the region and for sustainable transport connectivity within and beyond it.
- LSMATS needs to include a rail spur from the main Galway to Limerick line to service Shannon Town, Industrial Estate and Airport. Frequent direct rail services need to run between Shannon, Limerick, Ennis and beyond to Galway, Dublin, Cork and Waterford.
- LSMATS needs to outline the strategy to achieve an efficient, joined-up thinking approach to sustainable transport across the LSMA, including ticketing, multi-modal opportunities with bike and ebike shared schemes, on-demand feeder electric shuttles in both urban and rural areas, and bus and rail connections outside the area.

NSO: Strengthened Rural Economies and Communities

Strengthened Rural Economies and Communities are a strong part of the identity of the Southern Region. Rural areas play a key role in the Region's economy, environment and quality of life, which is reflected by the objectives of the Action Plan for Rural Development. (RSES)

“No place or community is left behind by the RSES. A dual-track strategy is pursued that builds on the cities, metropolitan areas as significantly scaled engines of growth, and supports opportunities for sustainable competitive advantage by repositioning the Region's strong network of towns, villages and rural areas in an imaginative and smart manner.” - RSES

- A specific strategic approach to rural transport options for the area needs to be included in LSMATS. We would like to see multi-modal opportunities for this outlined within LSMATS - prioritising the use of e-mobility, share schemes, active travel and on-demand electric public transport options to reduce car dependency, in particular for the high number of private car short journey trips.
- The impact of COVID-19 on mobility patterns and on remote working from rural and village communities needs to be included in the LSMATS. With a Town Centre First approach included in the Programme for Government, the roll-out of broadband and the development of community hubs, the potential new mobility patterns should be identified and included in the revised targets for modal shift in a redraft of the LSMATS.
- In order to revitalise our city, town and village cores and address high vacancy rates, we need to encourage people back to living in town centres. LSMATS needs to include a strategy for addressing how best to design active

travel and public transport routes to enhance their health, social and economic impacts and not detract from our urban centres.

NSO: High-Quality International Connectivity

High-Quality International Connectivity is crucial to the Region for overall international competitiveness, in addressing opportunities and challenges from Brexit through to investment in our ports and airports. National Ports Policy and National Aviation Policy, coupled with high-speed broadband are the chief instruments in consolidating and improving on our Region's international connectivity. (RSES)

- LSMATS needs to include a rail spur from the main Galway to Limerick line to service Shannon Town, Industrial Estate and Airport to address the poor connectivity for large workforce at the industrial estate and those using Shannon Airport for both business and tourism connectivity. This will have the added benefit of reduction of traffic congestion for commuters in Ennis and Shannon.
- With the collapse in the aviation industry as a result of the COVID-19 pandemic, a redraft of the LSMATS needs to include a focus on ferry, rail, Greenway and Blueway connections to develop Sustainable Tourism offerings in the Mid-West. Greenways need to be designed with a view to providing local community utility use, in addition to tourist and recreational use.
- Although the LSMATS supports the RSES objective to develop a Regional Freight Strategy, we would like to see this expanded upon within a revised LSMATS including outlining the potential of connecting up with Waterford and the Western Rail Corridor and that the focus and prioritisation should favour rail over road connections from the port.

NSO: Sustainable Mobility

Sustainable Mobility is core to Ireland's Climate Change mitigation plan. A managed transition to electrifying our mobility systems is critical. We need to move away from polluting and carbon intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets. In line with the NPF, we need to ensure that our Region will enjoy a cleaner, quieter environment free of combustion engine driven transport systems by 2040. (RSES)

- The targets for modal shift in the LSMATS are not adequate for the meaningful change required to make a regional contribution to reach our national targets for the reduction in transport emissions. LSMATS needs to include transport emission reduction targets inline with those laid out in the Programme for Government and that will align with the new Climate Bill (currently at Committee Stage).

RSES references the Climate Act 2015 (since overturned in the courts) and also references the Climate Action Plan of 2019 (to be superceded) and these should no longer be used as reference points. Ireland is a signatory to the Paris Agreement, yet the current LSMATS continues to prioritise private car use. Although EV use will reduce transport emissions it does not mitigate the environmental and ecological cost of EV manufacturing or new road building. Plans for the Northern Distributor Road (NDR) and Limerick-Cork Motorway need to be paused in light of more ambitious national and EU climate targets.

- A project plan to roll out high-quality, fully inclusive, safe and comfortable walking and cycling networks for Limerick, Shannon and smaller villages and towns in the catchment area needs to be included in LSMATS.

These active travel networks should provide direct, cohesive mobility networks between all origin and destination points (e.g. public transport, health services, education, employment opportunities, amenities, residential areas) where walking and cycling journey times are designed to be more competitive than driving journey times.

LSMATS needs to explicitly outline how road space will be reallocated away

from private car use and to sustainable public transport and active travel networks.

- LSMATS should address the standard to which implementation should adhere to, to ensure that active travel networks enable people of all ages, genders, and abilities to move safely, and comfortably around their own communities in the area. We would suggest that international best practice be adopted until an updated National Cycling Manual is made available. DMURS should be used as the basic standard of implementation, alongside adopting a Sustainable Safety policy for traffic flow and traffic access.

- Given the frequent difficulties with improving permeability and roll-out of active travel interventions due to lack of community engagement, we would like to see the establishment of a Citizen Engagement Office within the area proposed in LSMATS with a particular focus on continuous community engagement so that interventions can be trialled, evaluated and improved on an ongoing basis.

- We would like to see LSMATS indicating that all active travel networks and public transport needs to be fully inclusive and adhere to Universal Design standards, including stops, shelters, stations, bathrooms and bus and rail fleet.

- We would like to see LSMATS indicating that all buses within the fleet should be zero carbon emitting by 2030.

- As adopted in many cities internationally and in line with the UN General Assembly endorsement of 30kmh urban defaults, we would call for a 30km/hr default speed limit applied to all built up areas to help reduce fatalities, injuries and to provide better conditions for those embracing active travel in the area.

- LSMATS needs to include a strategy to roll-out filtered through traffic from streets and public spaces in our urban centres. Active mobility zones, school streets, proactive community engagement should be considered within this

strategic point.

- LSMATS needs to include a strategy for addressing illegal parking and we would like to see an increase in the number of traffic wardens employed, close cooperation with local Community Policing and an extensive awareness campaign of illegal parking which disproportionately affects people with children, disabled people, particularly people using mobility aids or people with visual impairments. A citizen-led reporting portal should be included in the strategy.

- LSMATS strategy should include a strategy for current and potential Greenways and their role as potential components within an overall utility network. They should be leveraged to extend the network, but should not replace more direct and comfortable routes, even if motor traffic flow on more direct routes is inconvenienced.

- LSMATS needs to include a strategy for the rollout of charging points for electric wheelchairs, e- bikes and e-scooters throughout the area. We would suggest including a plan to provide charging facilities at rural post offices which act as valuable social and community hubs in the area.

- LSMATS needs to include a strategy for behaviour change initiatives to enhance modal shift as the active travel networks are rolled out. These initiatives could include cycle training for children, cycling training for those newly resident in Limerick, working with business and employers to provide workplace facilities such as showers and lockers.

- LSMATS needs to include a strategy for dedicated bus lanes, including the use of a camera-based system to deter private car drivers from using bus lanes.

NSO: A Strong Economy Supported by Enterprise, Innovation and Skills

A Strong Economy Supported by Enterprise, Innovation and Skills requires a competitive, innovative and resilient regional enterprise base as an essential precursor to job creation. We need to foster an enterprise environment which entices people to live and prosper in the region. To withstand the external shocks that an open economy can be subjected to, resilience and agility must be the watchwords for a sustainable, healthy and thriving regional economy. (RSES)

“To withstand the external shocks that an open economy can be subjected to, resilience and agility must be the watchwords for a sustainable, healthy and thriving regional economy” - RSES

- As a result of the COVID-19 pandemic, there has been a surge in remote working, as well as international interest in the concept of the 15-minute city. The Limerick and Shannon Metropolitan Area will now compete with Irish and European regions to attract talent to live here and to set up business here. Understandably, this has not been considered in the preparation of LSMATS but should be considered in its redraft with modelling to include shorter, trip-chained, community mobility patterns and potential reduction of frequent, longer commuter patterns by private car.

NSO: Enhanced Amenities and Heritage

Enhanced Amenities and Heritage enriches and nurtures our community life. By acting as custodians of our wealth of culture, heritage and the arts, we are safeguarding it for future generations. Increased emphasis on attractive place making will require ease of access to amenities and services supported by integrated transport systems and green modes of movement such as pedestrian and cycling facilities. (RSES)

“Use quality urban design to enhance the character of a place and to ensure development is respectful of the existing physical, social, environmental and cultural context” - RSES

- Planned transport infrastructure must consider its impact on the public realm and the setting of cultural and heritage amenities. High traffic bus routes should not treat town and city centres as major transport corridors as is the case in this draft of LSMATS.

- We would like to see the inclusion in the LSMATS a strategy for the development of local authority multi-disciplinary active travel teams - combining architectural, urban design, engineering, public health, landscaping skillsets - to be assigned to active travel and public transport interventions to ensure the best and most sensitive design can be used for urban centres in the LSMA.

- A parking strategy needs to be clearly outlined within the LSMATS including removal of on-street parking within city and town centres to improve the visual access and attractiveness of our streets and remove the unhealthy impacts of engine idling.

In a revised LSMATS, this parking strategy should include a pricing structure with premium rates for closer to town and city centres. It should also include how best multi-storey car parks can be used over the next twenty years as modal shift occurs e.g. conversion of lower levels of multi-story car parks to sheltered, secure bike parking.

It should include a strategy for the roll-out of secure, well-lit, sheltered bike parking based on origin and destination identification and including adequate disabled bike parking spaces. Nearest private car parking spaces should be designated for disabled people.

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- Inclusive, public spaces and active travel networks provide opportunities for more social interaction leading to better social cohesion and advanced social capital.

As stated in the RSES, “the resilience of the region is linked to environmental quality, climate resilience, quality of services and developing a tolerant open society.” We need to reprioritise the use of public spaces for people and this should include places for people to stop, rest, interact. LSMATS needs to include this prioritisation so that it is considered during the planning and design of both public transport routes and active travel networks.

- We would like to see the revised LSMATS include a ban on HGVs from the core of Limerick City and Shannon Town and a strategic plan for last-mile delivery services throughout the area.

NSO: Access to Quality Childcare, Education and Health Services

Access to Quality Childcare, Education and Health Services is key to meeting the demands of an increased population, starting with early childhood care and education, investment in schools and third level institutional infrastructure. Education is central to our ambition as a nation and requires careful planning and coordination across national, regional and local public bodies. The future of the Health Service is addressed by Sláintecare, a 10-year plan for health reform which aims to deliver a universal, high-quality, and integrated healthcare system. (RSES)

- Health Services include Public Health preventative health measures. The impact of our built environment and transport options have a significant, evidence-supported impact on our health. Quality, inclusive active travel infrastructure networks will have the biggest impact on the wellbeing and health of the people of the Mid West - our physical, mental and social health.

Car-dependency (continued through Induced Demand from current proposed interventions such as the Northern Distributor Road and Limerick-Cork Motorway) continues to exacerbate our obesity epidemic which in turn heightens

the risk of cancer, cardiovascular disease, orthopaedic problems, and diabetes. Traffic emissions cause 1,700 new diagnosis of paediatric asthma in Ireland each year (Lancet, 2019). EVs will assist in this but does not negate pollution from car braking friction or address the sedentary lifestyle impacts.

- Disabled People cycle and walk too and it is important that this is acknowledged in LSMATS. Disabled people are disproportionately affected by barriers to access to physical activity and as a result many disabled people have reduced life expectancy. Active travel mobility networks need to accommodate all kinds of cycles including trikes, handcycles, mobility aids and wheelchairs. A variety of public seating needs to be included in all active travel networks to accommodate people of all ages and all abilities.

- LSMATS does not adequately address transport equity across the area, and a redraft needs to seriously address the socio-economic aspect of access to available transport options. Approx 25% of households in Limerick City and suburbs do not own a car. Therefore the majority of people in the city need to an alternative method of transport to access quality childcare, education and health services. Publicly funding road schemes that in turn will result in urban sprawl and foster continued car-dependency in the future is not an equitable approach to transport provision.

- The current Programme for Government includes the use of a set of well-being indices to create a well-rounded, holistic view of how our society is faring, going beyond our existing economic measurements. We would like to see the LSMATS redraft use of the WHO Health Economic Assessment Tool (HEAT) to assess the current level of active travel infrastructure and projected for the new proposed interventions.

Better Ennis Requests

- We are calling for a thorough review of LSMATS in order to redraft a much more ambitious plan to align with the RSES as viewed through the prism of the global shock of the COVID-19 pandemic, climate emission reduction targets as outlined in the current Programme for Government and to align with the new Climate Bill, currently at Pre-Legislative Committee Stage.
- We are calling for the redraft of LSMATS to take on board the impact of the pandemic on mobility patterns and remote working numbers.
- We are calling for the redraft of LSMATS to maximise the targets of modal shift to active travel, public transport and multi-modal trips by identifying the true potential of extensive active travel and public transport infrastructure and behaviour change initiatives.
- We are calling for the redraft of LSMATS to prioritise active travel investment of public funds - given it is the most sustainable, most cost-effective, most resilient, most equitable mode of transport.
- We are calling for two rounds of in-depth, extensive public consultation with the people of Limerick and Clare on an initial and subsequent redraft of LSMATS given that it will be adopted into and inform the Limerick City & County Development Plan and the Clare County Development Plan on a statutory basis.