

**Limerick
Cycling
Campaign**

**Limerick
Pedestrian
Network**



TO:
Minister Eamon Ryan
Leinster House
Dublin

Ms. Anne Graham
Chief Executive Officer
National Transport Authority
Dun Sceine
Harcourt Lane
Dublin 2

28th October 2020

RE: Limerick Shannon Metropolitan Area Transport Strategy - Open Letter

Dear Minister Ryan and Ms. Graham

Advocacy groups including the Limerick Cycling Campaign, Limerick Pedestrian Network, Limerick Cycle Bus and the Limerick Chapter of the Irish Georgian Society are calling today for a review of the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).

Collectively we are requesting that the NTA and the Minister for Transport pause the current process to :

- (a) align LSMATS with the climate and active travel commitments made in the current Programme For Government, the Living With Covid Plan, the Climate Action Plan, and the National Planning Framework.
- (b) bring an updated draft of LSMATS forward for a subsequent round of public consultation that allows for meaningful stakeholder and public engagement.

We believe the current draft of this document lacks integrity and credibility, does nothing for Limerick in 2020 and will struggle to deliver for Limerick and the Shannon region over the next twenty years. LSMATS is the oversight document that establishes the transport ambition in the region for the years ahead. This strategy document will be a reference point for active travel planning in the region until 2040 and we cannot stand over the abject lack of care and attention given to such a task, when transport impacts so heavily on every facet of our society.

LSMATS is being presented as a non-statutory document. However, it will be adopted into the Limerick City and Council Development Plan 2022-2028, which will give it statutory status. The ambitions set out in LSMATS (or lack thereof) will be locked into the city at least for the lifetime of the Development Plan. Furthermore, when we have made this point previously, we are guided to an Implementation Plan - that we cannot see or consult on.

Five Core deficiencies in the current strategy and the actions needed before productive consultation can proceed

1. **Ground the Strategy with Real Targets:** - LSMATS in its current guise has no targets. Without targets, how is success or failure measured? It makes it difficult to suitably direct resources efficiently and apply oversight to monitor delivery. The proposed implementation table is inadequate. There are no significant projects scheduled for completion in the city within the next 10 years. Almost all projects are scheduled to take 20 years to complete. This needs to be addressed.

The addition of clearly defined key performance indicators KPIs that are aligned with project objectives will help focus efforts on choosing the correct methods that will deliver results. Targets should be set for;

- Infrastructure delivery targets (project stages timeframe)
- Modal Shift (specific targets for [Education Journeys](#), work journeys, leisure journeys along with journey lengths)
- [Health and Inclusion parameters](#)
- Carbon Mitigation Targets ([clear targets should be set in line with the Climate action plan objectives and programme for government commitments](#))
- and other indicators of delivery on defined objectives.

Targets should align with independently monitored checkpoint reviews carried out at 2-year intervals for the duration of the strategy. These checkpoint stages will allow for a review, report and alignment or discontinuation of successful and unsuccessful methodologies employed to deliver on the strategies objectives.

2. **Engage in Meaningful Public Consultation:** Public consultation on LSMATS by the NTA and LCCC has been negligible. It falls short in every way of public sector guidelines ([DPER 2016](#)). No public meetings were held, and groups like ours which [engaged proactively](#) were given little assurance of our submissions making any difference to the draft. All political parties in Limerick have voiced serious concerns about the document and have asked for the consultation process to be paused or repeated, to no avail. We call for a robust and meaningful consultation process. This needs to be held *after* this round of submissions are taken into account by the NTA and LCCC and an amended version of the draft is made public. There is further detail about this group's engagement activity and the consultation process in the

[appendices.](#)

3. **Update and Correct the Faulty Modelling:** This is a process led document rather than a vision led document. It relies heavily on a data model to predict future car-based transport demand. We have assessed the modelling and found it to be of poor quality, It is based on many false assumptions while utilising out of date data. Future modelling should refine the options for meeting transport demand while meeting our carbon reduction commitments, including growing trends in Micro-Mobility (electric bikes and scooters). The modelling should play a supporting role to the overall transport vision, it should not define the vision.
4. **Acknowledge the Role of Transport in City Placemaking, Health and Regeneration:** A high-level vision for the future of Limerick must be a guiding principle of the transport strategy, where public health, transport inclusion, place-making, heritage protection and liveability form key areas for discussion and consultation. The strategy shows little regard for the Georgian heritage of our city centre. It shows little regard for the challenges our city faces and the hollowing out of the city core that is taking place at pace. It does not sufficiently tie in with the local authority's analysis that identifies transport exclusion in the four main Regeneration areas. There is no accessibility planning underpinning this document or reference to actions that build up accessibility in communities where the local authority has readily identified social, physical and economic isolation. [Read more](#)
5. **Align the Strategy with National Climate Action Policy & The Programme for Government:** This strategy is based on increasing emissions until 2040. There are no targets for reduced emissions or sufficiently specific plans for how to reduce transport emissions. There was no process for carbon proofing this strategy on a systematic basis, to pivot to a near zero carbon investment strategy. In short this strategy is not climate action plan compliant. We are asking that LSMATS clearly sets out year on year targets on how it will align with the deliverables as set out in the Climate Action Plan, the Programme for Government and our international carbon reduction commitments.

Overwhelming cross-party support for a pause, redraft and re-consult

One singular positive we can see from the NTA's poor handling of the LSMATS process is that it has united Limerick voices like nothing else has before.

Every political party elected to Limerick Council has come out in opposition to this poor draft strategy. Local metropolitan councillors from Fianna Fail, Fine Gael, Labour, Sinn Fein and the Green Party have put out a range of statements decrying its lack of vision and ambition.

Kieran O'Donnell TD, the chair of the Oireachtas Committee on Transport and Brian Leddin TD, the chair of the Oireachtas Committee on Climate are both calling for a pause and update to LSMATS. Sinn Fein's Maurice Quinlivan TD and Senator Paul Gavan say it doesn't even meet the minimum expectations of what LSMATS should deliver.

Stakeholder groups involved, from active travel groups such as the Irish Pedestrian Network and Limerick Cycling Campaign to business groups such as Limerick Chamber are united against the current plan. The Limerick Chamber of Commerce, which represents over 400 businesses in the region have called for the process to pause to allow for additional layers of stakeholder and public engagement to be added.

Public reps, alongside advocacy groups, have called on Minister Ryan and the NTA to review the document and take time to put together a strategy document that adequately meets the needs of the Limerick - Shannon Metropolitan Area over the next twenty years.

The lack of consultation with the wider public is very disappointing. Limerick's Public Participation Network has had no contact from the NTA. We have had no consultation events from the NTA that were open to the general public. Whole sectors and communities have been completely excluded from any involvement in this process. The entire consultation and draft has shown itself to be out of touch with Limerick's needs, it's people and it's public representatives.

LSMATS is the key to meaningfully achieving modal shift in our city, supporting a city core that's on its knees due to what the strategy correctly refers to as "a legacy of car dependency, which has contributed to a wide range of economic, environmental and social issues including longer commutes, declining urban centres, poor public health, reduced air quality and noise pollution."

We all stand united in the promise Limerick has. We're proud of our city and believe in its immense potential to lead. Unfortunately, a Dublin-led process has ignored Limerick voices and expertise leading to what amounts to a low effort draft strategy that is completely out of touch with the needs of our city.

Consultation on LSMATS must be paused immediately. Submissions gathered to date should be folded into a new draft that better reflects the needs of Limerick people and the responsibilities of the NTA and Limerick Council under the Programme for Government and the Climate Action Plan. A revised draft should then be returned to the general public for a new round of consultation. Unlike the current consultation process, any future public consultation needs to be open, extensive, meaningful, inclusive of all voices and meet communities where they are.

To move to a final strategy document at this stage would be to ignore that Limerick has spoken with a singular united voice and said:

Limerick deserves better.

Limerick Cycling Campaign - Conor Buckely, David Tobin, Bruce Harper

Limerick Pedestrian Network - Madeleine Lyes

Limerick Chapter of the Georgian Society - Ailish Drake

Limerick Cycle Bus - Anne Cronin

Appendices

1 Lack of Targets

1.1 Targeting Education Journeys

Safe, segregated cycle infrastructure was due to be delivered to all primary schools, secondary schools and third-level institutions by the end of 2020 under the 2009 National Cycle Policy Framework. LSMATS only has a very loose commitment to delivering this already delayed promise by 2040. With the clear knowledge that school traffic is the primary factor in Limerick's rush hour congestion, routes to school must be prioritised and front-loaded in the implementation plan. This requires a clear plan with specific KPIs to ensure this essential goal is not missed yet again. Education needs its own section within LSMATS with a clear and specific modal shift target for cycling and walking. We need annual measurement of targets for schools and an annual updating of the plan to ensure targets are being met. If action needs to be undertaken to amend plans it must be done quickly and effectively to deliver these targets. Resources such as bike parking and training should be funded and provided on an ongoing basis to ensure barriers to cycling at each school or institution are eliminated in line with the proposed modal shift target.

The 2015 Arup Limerick Metropolitan Cycle Network Study identified the required routes to develop a proper safe, segregated network. This document has essentially been lifted and dropped directly into the LSMATS Draft Plan. Progress on this Cycle Network Study has been glacially slow to date. To fully connect all education institutions it is essential that it is front-loaded within LSMATS and its implementation plan, with the primary routes delivered within year one and the remaining secondary and connecting routes delivered by the end of 2025. Special consideration should be given to secondary routes that connect to education institutions and these should be prioritised in this section of delivery.

The number of children cycling to school has risen exponentially over the past 6 months and yet there is no mention of the unique opportunity this presents to move forward with the National Cycle Policy Framework 2009-2020, especially the commitment to ensuring all children have a safe cycle route to school. The Limerick Cycle Bus has seen an increase of over 70% in the numbers using it to travel to school, figures that are thankfully replicated across the country. LSMATS was written when the numbers cycling looked very different and we argue that the government is duty bound to entirely review this draft document to support the numbers of children cycling (and walking) to school with specific and precise targets and commitments. Research released at the beginning of this month tells

us that Finland is spending €7.76 on every member of society as part of their ongoing Covid 19 boosted investment in cycling. Limerick has to-date received one cycle lane on Shannon Bridge that only just this week has been modified for 'abnormal load bearing HGV's' and in doing so making this one piece of infrastructure unsafe once more. This strategy needs ambition that is set down in targets that cannot be fudged or side-lined at a later date for priorities such as 'abnormal load bearing HGV's'.

Throughout the LSMATS draft, **public health is frequently referenced without any substantive discussion of the benefits of active travel and we argue that positive health outcomes must be a strategy outcome of LSMATS.** In addition to this, the very low modal share target for cycling is completely at odds with the stated strategy outcomes. LSMATS should set out a far more ambitious modal share increase for cycling with a corresponding reduction in projected modal share for cars with specific reference to air pollution reductions under this new modal share projection.

The section on cycling contains no reference to our ageing population or the need to promote active travel among older people in the LSMA region. Cycling should be seen as a healthy means of transport for older people and as such cycling infrastructure should be installed that is accessible and useful for those over the age of 65. This section should contain specific reference to both a modal share target for older people cycling and a reference to cycling as a means of transport for people with disabilities. For many people with disabilities, cycling offers a means of transport that brings significant health benefits and restores a sense of independence. Some disabilities - for example, vision impairment - may exclude people from holding a driving licence. As such cycling should be considered a key transport option for people with disabilities. Access for people with disabilities should also inform the standard of cycling infrastructure that is provided.

1.2 Meeting Climate Mitigation Targets

Transport makes up one fifth of overall emissions. The 2020 Programme for Government (PFG) calls for an average 7% per annum reduction in overall from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050.

The EU Effort Sharing Regulation (ESR) sets a binding target of 30% reduction in GHG emissions (compared to 2005 levels) by 2030 for Ireland.

This strategy forecasts increased emissions to 2040 and has no targets to reduce carbon emissions.

The strategy needs to have time bound targets for carbon emissions and a framework to ensure those targets are met. An implementation plan to ensure that appropriate measures are put in place and the targets are being met is required. The plan must be adaptive and able to react to contingencies which put the target achievements at risk. The climate action plan will be updated annually and the transport strategy or its implementation plan should likewise be monitored and updated annually.

1.3 Targeting Journeys by Distance

89% of journeys begin and end within Limerick City and Suburbs. Considering the city and suburbs has a radius of between 5km and 8km many of these journeys offer an opportunity for a modal shift toward sustainable and active transport modes

Short distance trips (under 5km) should be the low hanging fruit in achieving any modal shift targets.

By effectively targeting and achieving an ambitious modal shift for a large cohort of shorter journeys individuals that may be dependent on private motor vehicles due poor rural connections or longer distances can still access the city.

1.4 Health Recommendation for LSMATS

5 Health Recommendations for LSMATS:

1. Inclusion of positive health outcomes as a Strategy Outcome of LSMATS
2. Modal share projections for air pollution levels
3. Target a modal share of population over 65 cycling regularly
4. Breakdown of health outcomes in disadvantaged areas and relation to connectivity
5. Section 7 should be amended to include a section clearly identifying cycling for those with disabilities

Breakdown of Health Recommendations:

1. Inclusion of positive health outcomes as a Strategy Outcome of LSMATS

Throughout the LSMATS draft, public health is frequently referenced without any substantive discussion of the benefits of active travel. In addition to this, the very low modal share target for cycling is completely at odds with the following stated strategy outcome from Section 5 - Strategy Development:

“Improved public health and wellbeing by promoting more physical activity in, either as walking and cycling trips in their own right or as part of linked trips with public transport”

In Section 15 - Strategy Outcomes, 7 Principles are outlined. Active Travel is mentioned in Principle 3 but again with only a cursory mention. Health as a benefit of active travel should at least form one of these Principles and merits much greater analysis within the document as a whole.

2. Modal share projections for air pollution levels

Limerick has three air quality monitors, one on O’Connell Street, one in Mungret and one in Castletroy. Not all of the air pollution we see is produced by private vehicles but they are a significant contributor. LSMATS should set out a far more ambitious modal share increase for cycling with a corresponding reduction in projected modal share for cars with specific reference to air pollution reductions under this new modal share projection.

This should be referenced to the national reduction in trips outlined in the 2019 Climate Action Plan which sets out a series of actions that need to be taken to achieve our climate targets. It estimates that Ireland will need a 45-50% reduction in transport emissions by 2030, with substantial acceleration in the second half of the decade. One of the pillars for achieving this is empowering modal shift.

3. Target a modal share of population over 65 cycling regularly

LSMATS Section 6 - Walking references ‘age-friendly towns’:
“Anticipated changes to the age-profiles across the LSMA will require the adaptation of public realm and transport networks to consider the varied needs of older people, including those with reduced mobility and/or cognitive, visual or hearing impairments and those with buggies.”

Section 7 - Cycling contains no reference to our ageing population or the need to promote active travel among older people in the LSMA region. Cycling should be seen as a healthy means of transport for older people and as such cycling infrastructure should be installed that is accessible and useful for those over the age of 65. This section should contain specific reference to both a modal share target for older people cycling and a reference to cycling as a means of transport for people with disabilities.

4. Breakdown of health outcomes in disadvantaged areas and relation to connectivity

Cycling is an important way to connect socially and physically isolated areas within the LSMA, particularly within Limerick City. People living in disadvantaged areas are more likely suffer from poor health including being overweight/obese and having a lower average life expectancy. We also often

see less access to healthcare. The cycling section of LSMATS should include health benefits as they apply to disadvantaged areas within the LSMA and how people living in these areas stand to gain from cycling infrastructure and greater connectivity.

5. **Include a paragraph with the Section 7 - Cycling regarding cycling for those with disabilities**

For many people with disabilities cycling offers a means of transport that brings significant health benefits and restores a sense of independence. Some disabilities - for example a vision impairment - may exclude people from holding a driving licence. As such cycling should be considered a key transport option for people with disabilities.

Access for people with disabilities should also inform the standard of cycling infrastructure that is provided.

2 Poor Consultation

LSMATS has been three years in the making. This is the first and only public consultation period on this document. Due to Covid-19, public open days and meetings were cancelled. Instead a phone number and email address was supplied. There was no online public platform on which citizens could engage. While the NTA and LCCC attended private consultation events organised by groups such as the Limerick Transport Forum, no public meetings were organised by the NTA or Limerick City and County Council.

In contrast, the groups behind this letter have worked in some depth to first develop our understanding of the LSMATS document, to examine its ambitions for Limerick and the figures and assumptions which underpin such ambitions. Since its publication, we have engaged in the following ways, among others:

- Collaborating to develop informed positions on the document in relation to our key priorities and values. We have worked to drive engagement with LSMATS in the city.
- We have attended and presented at public sessions hosted by representatives of Fine Gael, Labour, and independent councillors. We have had one-on-one conversations with representatives of all other political parties in Limerick.

- We have hosted two public events, one back as far as January 2020 attempting to drive engagement and conversation about LSMATS and its impact.
- As part of the Limerick Transport & Mobility Forum, facilitated by the Limerick Chamber, we attended four (so far) group sessions with other Limerick representatives of business, civic, community, and education sectors. Through this forum, we engaged with representatives from Limerick City Council, the NTA, and the Minister for Transport Eamon Ryan. These engagements were initiated in all cases by the Forum.
- As members of the Limerick Public Participation Network Travel & Transport Linkage Group, we have had a meeting with the other members and have outlined a statement on our disappointment with the NTA's lack of engagement with such a significant representative body.

We enumerate these different interactions in order to highlight our in-depth engagement with this Strategy, and to provide a contrast with the engagement initiated by the NTA and Limerick Council. We have grave concerns about the integrity of the consultation process, and have received little assurance of the potential impact of submissions

What constitutes citizen engagement:	Examples of what doesn't constitute citizen engagement:
<p>Citizens represent themselves directly as individuals – they are not representing (or being represented by) other groups.</p> <p>Two-way communication</p> <p>Aims to share decision-making power and responsibility for those decision.</p> <p>Includes forums and processes through which citizens come to an opinion which is informed and responsible.</p> <p>Generates innovative ideas and active participation.</p> <p>Contributes to collective problem solving and prioritisation.</p> <p>Requires that information and processes be transparent.</p> <p>Depends on mutual respect between all participants</p>	<p>Engaging only leaders of stakeholder groups of representatives.</p> <p>Participation does not influence decision-making.</p> <p>Participants only consulted at late stages of policy development (when decisions have effectively already been made).</p> <p>Seeking approval for pre-determined decision.</p> <p>Fulfilling statutory public consultation requirements without a genuine interest in the opinions of the public.</p>

Source: adapted from Sheedy, 2008.

FURTHERING CITIZEN ENGAGEMENT IN LOCAL AUTHORITY BUDGETARY PROCESSES THROUGH PARTICIPATORY BUDGETING IN IRELAND – Feasibility Study 2019

Consultation Principles & Guidance published by the Department of Public Expenditure and Reform last year outlines what does and does not constitute as citizen engagement. We see a lot of the right column, participation without influence, predetermined decisions, tick-box consultation.

3 Poor Modelling

The transport strategy is based on the assumption that most people will have cars and will use them to travel. It assumes that bikes are slower than cars even for short journeys and it assumes that bus lanes will not reduce the space for cars on the road. The model assumes that there will be too few passenger numbers for light rail as most people will be driving.

Transport modal share targets should be agreed in line with environmental, climate, public health and local development policy and set as an overhauled strategy, i.e. we should decide what type of city we want and then decide how to get there. A modelling process can then inform the strategy of what provisions would be required to meet those targets. This model ignores climate change targets and public health ambitions and aims to maintain the car based transport system we currently have.

4 No Holistic Vision

4.1 The rich architectural built heritage in Newtown Pery can be seen in the urban grain, the Georgian grid layout, the beautifully proportioned streets. Lined with Georgian townhouses, it's public spaces, that of The Crescent, Pery Square, John's Square and The People's Park are enhanced and enriched by its public buildings. All these public spaces are overwhelmed with privately parked cars and through traffic. In order to make these spaces attractive, they need world-class public realm design, the removal of through traffic and parking.

The real potential of quality public spaces can be seen in historic city centers all over Europe, many of which have restricted vehicular traffic access. Italian cities, for example, introduced ZTLs (Limited Traffic Zones), restricting vehicular access to their historic centres in the 1980's. A vision for Limerick City centre and a public realm strategy should underpin any decisions around traffic management within the city. A focus on walkability, active travel and high quality public spaces will protect and enhance the historic centre.

LSMATS instead has ignored this historic context. It fails to understand the hierarchy of the streets and the impact that heavy vehicles have on built heritage and the hostile, hazardous experience that will be perpetuated for pedestrians. The East West transport corridor doubles down on mistakes of the past, pushing larger, noisier, more frequent heavy vehicles through the city's most historic street, O'Connell Street.

In the 1987 Ireland signed up to the CHARTER FOR THE CONSERVATION OF HISTORIC TOWNS AND URBAN AREAS (WASHINGTON CHARTER 1987), which states:

“12. Traffic inside an historic town or urban area must be controlled and parking areas must be planned so that they do not damage the historic fabric or its environment.”

4.2 Transport exclusion is a real and very serious issue for underserved communities in Limerick- especially in the Regeneration areas. The local authority has identified that all 4 Regen areas (Moyross, Southill, St. Mary's Park and Ballinacurra-Weston) are inaccessible and isolated from adjacent neighbourhoods and the city centre - leading to social, economic and physical isolation. Since St. Mary's Park is currently categorised as the most deprived area in the country and an unemployment blackspot, how can this transport strategy firstly ignore transport-related social exclusion in its principles and secondly maintain that this document is inclusive when it makes no reference to the Regeneration areas listed above?

4.3 Accessibility planning is key and has been an important part of transport planning in the UK since the early 2000's. When we talk about transport accessibility – its largely about helping to promote social inclusion by tackling accessibility problems experienced by those more disadvantaged in society. A basic level of accessibility is ease of reach. This informs the concept of accessibility planning, which builds frameworks for accessibility strategies, that underpin transport strategies. This process needs to be informed by extensive stakeholder engagement and development of national and local indicators. In Ireland when we discuss accessibility in terms of transport, we are largely led to policy on people with disabilities. Whilst this is a very significant part of the accessibility picture, it does not capture social exclusion.

Strong social policy supports all citizens to participate in civil society. Exclusion is associated with low levels of individual accessibility. Typical communities impacted by transport exclusion are older neighbourhoods, physically cut off from the centre, poor accessibility to health care facilities and retail facilities, run down environments and concentrated levels of exclusion. In Limerick's case, these neighbourhoods have also suffered from high levels of early school leaving, high unemployment figures, higher levels of high-risk behaviours and in some instances anti-social behaviour.

5 No link to Climate Action Policy

Transport is a significant contributor to Ireland's carbon footprint coming in at a share of 12.2Mt (megatonnes) from our total emissions of 60.9Mt per annum. The LSMATS Transport Modelling Assessment Report shows that implementing the strategy will not decrease carbon emissions compared to doing nothing. That means carbon emission will rise as transport demand rises.

The Climate Action Plan has committed to an additional 500,000 public transport and active travel journeys daily by 2035 as part of their suite of measures to reduce transport emissions by approximately half in the next decade. LSMATS contains no key performance indicators (KPI) or any acknowledgement of this goal within either it's modeling or it's outcomes.

The Climate Action Plan also requires that “policies need to be better aligned to achieve more ambitious targets for modal shift.” LSMATS forecasts a *reduced* percentage of people walking if this strategy is implemented and a paltry increase in cycling. This conflicts with the Climate Action Plan and also contradicts Principle 3 of LSMATS itself which claims to “prioritise active and sustainable transport and reduce car dependency within the LSMA.”

The Climate Action Plan also calls to “expand sustainable-travel measures, including a comprehensive cycling and walking network for metropolitan areas of Ireland’s cities, with a particular emphasis on safety of cyclists.”

The associated Climate Action Charter for Local Authorities that Limerick Council has signed up to demands they “deliver a 50% improvement in energy efficiency by 2030” and to “ensure that policies and practices at local government level lead us towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.” It is clear that LSMATS does not provide any clear pathway to achieving the goals our local authority has pledged to uphold.

The 2020 Programme for Government (PFG) calls for an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. There is no reference to this goal within LSMATS and no sufficiently specific plan to reduce transport emissions in the strategy.