

Limerick Shannon Metropolitan Area Transport Strategy

Summary Report on the Public Consultation on the Revised Draft

September 2022

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1. Introduction

This report comprises a brief summary of the main issues raised during the consultation on the Revised Draft LSMATS which ran from 26th April to 10th June 2022.

The Revised Draft LSMATS was publicised throughout the LSMA in local newspapers and via social media. The NTA hosted two online public webinars during the consultation period and a number of other stakeholder engagements.

The Revised Draft LSMATS was available to view in the NTA's offices and the following documents were displayed on the main strategy consultation portal on the NTA's website:

- Revised Draft LSMATS (Irish, English, Easy to Read and Accessible versions);
- SEA Environmental Report;
- Appropriate Assessment Natura Impact Statement;
- Strategy Development and Modelling Report;
- Preliminary Equality Impact Assessment;
- Draft LSMATS Public Consultation Report;
- Rail Assessment and Cost Benefit Analysis; and
- Transport Modelling Assessment Report.

Members of the public and stakeholders were directed to an online portal to make submissions and to a feedback form to give their views. In addition, a small number of written submissions were accepted.

The NTA received 90 submissions made up of 87 public and stakeholder submissions via the online portal and 3 received via email.

1.1. The Main Issues Raised

The main issues raised were as follows:

1. Limerick Northern Distributor Road
2. Investment in Rail
3. Cycling
4. Walking
5. Bus
6. Limerick City Centre
7. Targets, Metrics and Timelines
8. Climate Action Plan

1.2. NTA Responses

The NTA Strategy Team reviewed each submission. The submissions were then summarised using the online portal, focussing on those elements of each submission which sought a specific change to the transport strategy. These suggested changes were considered and a response drafted to each.

This exercise informed the finalisation of the LSMATS. This Public Consultation report has been prepared alongside the strategy, focussing on the main issues raised. The responses to the written submissions are set out in Appendix 1. Appendix 2 to this report sets out the responses of the NTA Strategy Team to the myriad matters raised by respondents, categorised according to each chapter of

the transport strategy, and Appendix 3 addresses those issues raised by the environmental authorities on the SEA and AA.

As such, the LSMATS comprises a comprehensive approach to transport planning in the LSMA for the strategy period based on a high level of technical and policy-based analysis and incorporating feedback from the public consultation process.

2. The Main Issues Raised

2.1. Limerick Northern Distributor Road

2.1.1. Issue Description

The removal of the LNDR from the revised draft was a major concern for a broad range of individuals and organisations. The main issues raised in this regard were as follows:

- Alignment with the Regional Spatial and Economic Strategy;
- Alignment with the Clare and Limerick Statutory Development Plans;
- Impact of its removal on the potential to remove traffic from the city and suburbs and provide for sustainable transport measures;
- Need for direct connectivity from Shannon and Clare to the NTP and UL;
- Congestion issues at Corbally; and
- Congestion issues at Mackey Roundabout M7 Junction 28.

There was also considerable support expressed for the removal of the LNDR, primarily on the following grounds:

- Community severance of towns and villages in South Clare caused by the route; and
- Environmental Impact including flooding and emissions.

2.1.2. NTA Response

In finalising the LSMATS, the NTA and local authorities undertook considerable further analysis of the impact of the LNDR across all areas of transport planning: traffic flow; mode share; emissions; journey times; availability of alternatives etc. in order to gain a full understanding of its effects at a local and strategic level.

In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS..

All of the issues raised during this consultation period have been central to the deliberations on this matter in the final LSMATS. As such, it remains the intention to address two major issues which impact on the movement of public transport and on the provision for comprehensive, safe and attractive walking and cycling facilities on major corridors into Limerick City, namely:

- Traffic management and road safety at the Mackey Roundabout, Junction 28 on the M7; and
- Significant constraints for the provision of bus priority and cycle facilities on the Corbally Road corridor.

Accordingly, schemes will be developed and delivered to address these issues. This is reflected in a new measure RS5 being included in the final LSMATS.

2.2. Investment in Rail

2.2.1. Issue Description

The potential for suburban rail to play a significant role in transport in the LSMA has been to the fore in the development of the LSMATS. Initial analysis by the NTA in the making of the original draft LSMATS indicated that it would play a limited role due to an absence of demand, based on the legacy population and employment distribution patterns and forecast patterns based on the policies and objectives of the regional and local authorities.

Due to the response to the original draft, the NTA undertook, with the cooperation of Irish Rail, a comprehensive assessment of the potential for rail in the LSMA for the first time. The outcome of this assessment was similar to that from the original draft, however the NTA were satisfied to set out a pathway to more significant (Phase 2) investment on the condition that a radically different approach to land use development would be applied by the planning authorities.

Notwithstanding this approach, a large number of respondents are of the view that the more ambitious Phase 2 programme should be delivered in the short-medium term.

The other main issues raised related to rail were as follows:

- Flooding at Ballycar;
- Better services on the Ballybrophy Line;
- Opening the Foynes Line for passengers in advance of the Ryder Cup in 2027; and
- Need for dual-tracking of the entire network.

2.2.2. NTA Response

The LSMATS proposes to develop the LSMA rail network in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS.

The main priorities for rail investment in the LSMA, arising out of the LSMATS work, are as set out in Phase 1. In the event that circumstances change, the NTA will take that into account in the review of the LSMATS in the coming years. Furthermore the LSMATS is not intended to preclude elements of Phase 2 being brought forward in advance of that review if they are found to be viable and meet the objectives to engender a mode shift away from the private car and reduce emissions.

A number of amendments have been made to the text on foot of the consultation to account for issues raised, including the following:

- The findings of the N/M20 scheme work;
- Text on the infrastructural safeguard for the Shannon rail line; and
- Rail freight at Limerick Junction.

2.3. Cycling

2.3.1. Issue Description

A number of additional routes were identified by respondents for inclusion in the cycle network and refinements suggested for others. The matter of E-bikes and micro-mobility was also raised. In general, there was broad support for the substance of the LSMATS, however, a high degree of dissatisfaction was expressed in relation to the pace of delivery of cycle infrastructure.

2.3.2. NTA Response

The Cycle Network map has been updated taking into account the submissions seeking clarification and inclusion of additional routes

The text of the Cycling has been subject to a number of changes to account, *inter alia*, for the following:

- Removal of Clancy's Strand and the addition of O'Callaghan Strand into the network;
- Integration of National Cycle Network; and
- New section on Electric Bikes.

Delivery and timelines are dealt with in 2.7.

2.4. Walking

2.4.1. Issue Description

A number of localised issues relating to the potential inclusion of certain schemes in the LSMATS were raised, as was the potential pedestrianisation of O'Connell Street. A number of measures were proposed to support the walking mode in the LSMA. Generally, there was support for the LSMATS overall direction which is to significantly enhance the pedestrian environment.

2.4.2. NTA Response

In relation to O'Connell Street, the position is unchanged since the original draft, i.e., it has been identified by the NTA and LCCC as the preferred option for delivering the maximum numbers of people to city centre workplaces, businesses and other activities. The routeing shown in the LSMATS is indicative and will be subject to the outcome of public consultation on a revised Limerick bus network.

Changes to the report have been made to account for suggestions, including the following:

- Safety and personal security issues;
- Links between towns and villages; and
- Inclusion of other major destinations for consideration for improved pedestrian facilities.

2.5. Bus

2.5.1. Issue Description

The issues raised related to bus included support for greater levels of priority, but also some questioning the rationale for doing so. Many problems were identified with bus service quality in the

LSMA and the matter of bus using O’Connell Street was also raised under this topic. The proposed dedication of Sarsfield Bridge to this higher capacity mode was also an issue.

2.5.2. NTA Response

The bus chapter in the LSMATS is a means of framing a more detailed, specific and localised set of measures to be brought forward under BusConnects Limerick and Connecting Ireland. As such, it would not be fully meaningful or useful to be overly prescriptive in the LSMATS about the specific details. Many of the issues raised are covered under the overarching LSMATS measures.

O’Connell Street is dealt with under 2.4.2.

The final LSMATS includes the following changes in the Bus Chapter:

- Inclusion of interchange with Rail as a consideration; and
- TUS and UL included as destinations for Shannon services.

2.6. Limerick City Centre

2.6.1. Issue Description

Issues which affect the city centre were raised across the various chapters of the LSMATS, including:

- Potential positive and negative impacts of the LNDR;
- O’Connell Street;
- On-street parking;
- Traffic Management and One-Way system;
- Need for a City Centre plan;
- Cycle parking; and
- Consultation with businesses;

2.6.2. NTA Response

O’Connell Street is dealt with under 2.4.2.

The majority of the issues related to the City Centre will be subject of the Limerick City Centre Traffic Management Plan, to be undertaken by the Council and NTA after the finalisation of LSMATS.

Overall, the thrust of the LMSATS is to set the framework for the local authority and other stakeholders, supported by the NTA, to enable a balance to be struck between access for essential services and deliveries and the need to foster development of the city centre and wider metropolitan area. This will be achieved by realising the potential for increased activity by providing the footfall via sustainable modes, and by making the centre more attractive by providing a significantly enhanced public realm.

No specific changes to the LSMATS were made in relation to the city centre.

2.7. Targets, Metrics and Timelines

2.7.1. Issue Description

As in the previous draft, the manner in which the LSMATS is proposed to be implemented and monitored and the level of detail contained in the report has been a major issue. This relates to: scheme delivery; mode share; emissions; inclusivity; road safety targets; and the reduction in car parking.

2.7.2. NTA Response

The LSMATS is a long-term high-level regional strategic plan whose function is to set out the framework for all actors in the transport and land use planning sector to align their investment and policy platforms. It is a matter for all of those agencies, including the NTA, to take responsibility for those elements they must deliver and incorporate the findings of the LSMATS into their implementation plans.

In relation to mode share, the targets for cycling are ambitious, in particular given the negligible numbers cycling at present, but they are not a limit, and the infrastructure the local authorities, supported by the NTA, will seek to deliver will facilitate a significantly higher mode share than that which emerged from the modelling exercise included in the LSMATS materials.

The manner in which the phased implementation of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail and endeavour to deliver this in the context of design complexities and opposition to measures such as roadspace reallocation and parking removal.

On-going monitoring of the impacts of the LSMATS at the local level is a matter for the local authorities and the NTA will input as required and maintain its role in monitoring impacts at the regional level. The NTA will also deliver the funding required for active travel in accordance with our objectives in the LSMATS. The public transport services and infrastructure schemes will be determined by the lower-level plans, such as BusConnects. Engagement will take place at the earliest stages in these plans.

The following changes were made to the final LSMATS report to reflect some of the issues raised under this heading:

- Addition of Air Quality monitoring;
- Inclusion of attitudinal transport surveys under Monitoring; and
- Addition of new section on “Responsibility for Delivery”.

2.8. Climate Action Plan

2.8.1. Issue Description

In relation to emissions, a number of respondents raised the fact that the measures contained in LSMATS alone are not forecast to lead to a reduction in transport emissions of 50%, as required by legislation. Conversely, some others are of the view that it is possible to avoid any additional punitive measures. Emissions were also linked with a number of aspects of the LSMATS, such as the LNDR and cycling investment.

2.8.2. NTA Response

The NTA undertook comprehensive modelling assessments of the LSMATS throughout 2021 and 2022 as it related to emissions. This work demonstrated clearly that significant measures outside the remit of the NTA and the LSMATS would be required to be implemented in order to reach the 50% target. An alternative to this would be to incorporate extremely punitive traffic management measures into the LSMATS which would apply only in the LSMA and which would not likely be acceptable from an accessibility and equality point of view.

The additional measures will include further demand management measures to be determined by national policy, and changes to fuel, in particular changes to the fuel technology used for long distance HGVs. This is all set out in Chapter 17. The NTA is committed to undertaking all measures within its remit that are required to contribute to the carbon emissions reduction targets and to cooperate with other agencies and stakeholders to deliver other measures.

Appendix 1 – Revised Draft LSMATS - Response to Written Submissions

1. Henry O’Boyle

Submission relates to LNDP

NTA Response – In line with the Minister’s recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister’s Office after the second round of public consultation, the LNDP does not form part of the final LSMATS.

2. Tipperary County Council

Tipperary County Council again requests to be formally added as one of the 34 Stakeholders for the remaining stages of the LSMATS, and all future revisions of same.

NTA Response – This is a reference to the stakeholders consulted at pre-draft stage in 2019 who represent interests within the LSMA. No group was established. No change required.

Tipperary County Council would again request that consideration be given to the North Tipperary Development Plan as outlined in the previous submission, and further would now highlight that Tipperary County Council’s first countywide Development Plan is nearing completion, and so the latest draft, should be considered in detail

NTA Response – Reference to the Tipperary County Development Plans was included in the Revised Draft. No change required.

Particular consideration should be given to Newport, as it is only slightly outside the LSMA

NTA Response – Text added to 16.4

Consideration should also be given to the Town of Ballina, which offers an opportunity to support the growth of the LSMA region,

NTA Response – Text added to 16.4

Tipperary County Council is not satisfied with the form of wording used. For example, page 27 of the revised LSMATS document states “*and the possible enhancement of the N24 between Limerick and Waterford*”. Tipperary requests the removal of the word “possible”.

NTA Response – this is a direct quote from the RSES. No change required.

Tipperary notes that on page 128 of the latest LSMATS draft, “*Implementation Plan*”, no reference is made to the N24/M24 and so Tipperary requests that the N24/M24 is included as a specific objective on this page.

NTA Response – the N24 scheme is supported in the LSMATS document and will be included in the Implementation Plan on foot of TCC’s recommendations. It should be noted that no part of the scheme is inside the LSMA and it is therefore outside its spatial remit.

TCC request that the words “*as demand for travel increases*” be removed from the above text (page 74), as demand will increase as services increase.

NTA Response – The NTA would not support this approach as it would not represent a prudent use of exchequer funds. Wording is similar to that used for Moyross station. No change required.

TCC would also request that the above wording be changed from “*Nenagh to Ballybrophy*” to “*Limerick - Nenagh – Ballybrophy*”.

NTA Response – Wording changed.

Furthermore, TCC would highlight that page 36 of Iarnród Éireann’s Strategy 2027, published in 2021, identifies the Limerick to Nenagh lines for “*enhancements*”. This line offers significant opportunities for commuting for the towns and wider hinterlands of Nenagh, Birdhill (Ballina) and Castleconnell.

Consequently, Tipperary County Council requests that the above references, in particular the Strategic Freight Terminal at Limerick Junction and the need for improvements to be made to the Limerick Junction to Waterford Line, along with the points made on the previous submission, are incorporated in the subsequent LSMATS document

NTA Response – Changes made to report

Tipperary County Council would now highlight that the following routes through Limerick - Tipperary have been included in the latest draft of the National Cycling Manual and so should be referenced in the LSMATS document:

Limerick to Clonmel and on to Waterford.

Limerick to Thurles and on to Kilkenny.

Limerick to Nenagh and on to Roscrea.

NTA Response – Text added to 9.1.8 to reflect NCN

Re-read original submission

NTA Response – the NTA has once again reviewed the original submission from Tipperary County Council and is satisfied that the recommendations have been incorporated appropriately based on the spatial remit of the LSMATS which does not cover any part of Tipperary. No further changes required.

3. IDA

In further developing pedestrian infrastructure, investment should seek should address how it can enhance existing pedestrian infrastructure between Strategic Employment Locations, Limerick City and residential areas, in addition to considering potential future employment locations which may be developed in the future to ensure appropriate infrastructure is in place to sustainably support such growth.

NTA Response – Noted. It is the intention to delivery high quality footpaths and supporting pedestrian facilities throughout the built-up area of the LSMA linking all major destinations. No change required.

Investment in cycling welcomed. It is noted however that the planned cycle network will not enhance cycle connectivity from the northern to eastern side of Limerick.

NTA Response – Noted. In the absence of the LNDR, orbital trips would be directed onto the improved primary network through the existing urban areas. Consider additional secondary routes.

It is apparent that planned bus priority infrastructure will not accommodate delivery of orbital bus services from the northern to eastern side of Limerick.

NTA Response – in the absence of the LNDR, it would be the intention of the NTA to investigate the potential for orbital services on the existing road network, with improvements as appropriate.

In redesigning the routes, consideration should be given to providing direct connections between Strategic Employment Locations, the City Centre and residential areas, and a northern to eastern orbital service as noted above. It is however acknowledged that full integration of the core bus corridors is not anticipated before the mid-2030

NTA Response – it is the intention of the NTA to review the bus service network in the short-term and the enhancement of the connections referred to will be a key objective, directly or via interchange.

The proposed the new railway stations proposed at Ballysimon is welcomed by IDA Ireland, and it is recommended that the emerging Transport Strategy should consider how to enhance connections from it to Strategic Employment Locations, including the IDA National Technology Park.

NTA Response - Noted. This will be a consideration in the bus network review.

Planned future improvements to the road network appear to now have been almost completely omitted from the Revised Draft LSMATS.

NTA Response – The Revised Draft included the N19, N69/M21, N/M20 and N24 schemes; measures to address issues on the M18; and a number of regional / local road schemes within the LSMA.

IDA Ireland request that the decision to omit the LNDR be reconsidered, and that the LNDR be reinstated for long-term delivery within LSMATS prior to its finalisation. To ensure the proposed scheme contributes to national and regional sustainable transport policy, including the identified Strategic Transport Objectives of LSMATS, it is recommended that the scheme be advanced as a multi-modal corridor, with high-quality facilities for active travel modes and bus, addressing clear gaps in such infrastructure as noted within this Submission.

NTA Response – In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

Appendix 2 – Submission Details and NTA Deliberations

Note to Readers

This document is an extract of the key points made by all members of the public and stakeholders who made submissions via the online portal on the Revised Draft LSMATS, published in April 2022. It is focussed on those parts of submissions which recommended changes to the Transport Strategy report only. It does not seek to summarise contextual material submitted or commentary not pertinent to the role, function and remit of the Transport Strategy.

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The column marked “NTA Deliberations” summarises the initial thoughts of the NTA Strategy team members in response to the point made and does not represent the final decision made as to changes to the Transport Strategy.

This report is collated according to each chapter of the strategy report. As such, in order for readers to find the NTA’s initial response to their submissions, it is recommended that one searches for the submission reference number which was sent as part of the automatic reply e-mail when the submission was made. If more than one point was made in the submission, the number will feature multiple times across the various chapters the respondent commented on.

Category	Topic	References	Issue	Statement	NTA Deliberations
1. Rail					
Rail	Light Rail	NTA-C7-38	Light rail to Mungret	Re a heavy rail service to Mungret - that may well be better served by Light Rail as it is quite a short distance from Limerick city centre.	Light rail is most suited to high density urban development and is required only where demand for travel on a particular corridor exceeds that which can be provided by bus. In the analysis undertaken for the LSMATS, the demand for travel on this corridor was not forecast to be high enough to justify light rail up to 2040. No change required
Rail	Light Rail	NTA-C7-86	Light rail on Dock Road	Current plans should be designed to facilitate a future light rail or dedicated bus corridor connecting Mungret station with the city along the dock road (with a possible continuation through the city to UL and Castletroy/Anacotty via the Canal Bank)	Light rail is most suited to high density urban development and is required only where demand for travel on a particular corridor exceeds that which can be provided by bus. In the analysis undertaken for the LSMATS, the demand for travel on this corridor was not forecast to be high enough to justify light rail. Dock Road is identified in the LSMATS as a bus corridor. No change required
Rail	Light Rail	NTA-C7-20	In favour of Light Rail	The University takes the view that the strategy is constrained by too short-term a perspective on modes of public transport. In particular the University takes the view that reliance on bus transport as a core Campus to City Centre link is unduly devoid of a more futuristic approach and believes that a dedicated light rail link should become the core infrastructure from the perspectives of sustainability, reliability and public acceptance. The University's plan for the development of a dual learning and research model on lands which are currently under review as to their suitability for designation as a Strategic Development Zone will provide opportunities in terms of scale to facilitate inter-destination very light rail as is being laid in German Cities and should be considered as a key component of the strategy.	Light rail is most suited to high density urban development and is required only where demand for travel on a particular corridor exceeds that which can be provided by bus. In the analysis undertaken for the LSMATS, the demand for travel on this corridor was not forecast to be high enough to justify light rail. No change required
Rail	RL1 - InterCity Services	NTA-C7-78	Support for direct intercity services	There is no mention of direct-Rail (no-change) services to Cork, Galway and Waterford. As a regional economic powerhouse, Limerick should be developing fast and direct transport links between the other major cities in Ireland. Direct and regular (hourly) train services linking Limerick with Galway, Cork and Waterford should be developed.	Noted. Waterford added to RL1.
Rail	RL1 - InterCity Services	NTA-C7-76	Divert Dublin-Limerick services via Nenagh	we do believe that in the medium to long-term some Limerick to Dublin intercity services should be diverted via Nenagh when the line's track and signalling are upgraded. This is a shorter and potential faster route if line speeds are increased to 70 or 80 mph. The route from Limerick to Ballybrophy was the main route to Limerick until the 1970's. We believe the NTA should adopt this as a specific target as part of the LSMATS.	Noted. Covered under RL1. No change required.

Rail	RL1 - InterCity Services	NTA-C7-46	Support for direct Limerick - Cork service	<p>The development of a transport solution for the N/M20 Project has involved an appraisal of three options for providing a new no-change train service between Cork and Limerick. A preferred RS1 option has been identified using existing lines with a journey time of 1 hour 21 minutes. Modelling of future demand identifies that such a service would generate around 700 extra journeys per day between the cities. The infrastructure costs for alternative services comprising the construction of a new line (from Charleville to Patrickswell or Charleville to Killonan Junction) are almost seven times higher than RS1. The new RS1 service is being promoted by the project team for consideration within the All Island Strategic Rail Review. It is recommended that this option should also be included in LSMATS on the basis that it will deliver on the overall N/M20 project objective of improving connectivity and providing greater opportunities for travel between Cork and Limerick, while maximising opportunities offered by the existing rail network to enhance regional and suburban connections as advocated in LSMATS.</p>	Noted. Change made to report.
Rail	RL1 - InterCity Services	NTA-C7-38	More direct services	<p>the present rail service to Tipperary Town, Clonmel and Waterford starts and terminates at Limerick Junction whereas many persons working in Limerick would wish to travel to / from Colbert station. Extending the Waterford line trains to Colbert would be easy as they would simply be integrated into the present Colbert / Junction shuttle service.</p> <p>The present service between Limerick Junction and Waterford is UNUSABLE. It needs a 2 hourly frequency on the line and trains timed suitable for passengers to use - to commute to and from work in Limerick and to shop as well as effectively connecting Limerick to Clonmel and Waterford. A regular and well timed service would also connect Tipperary Town commuters to the centre of Limerick for working and business. It would also be easy to extend a couple of the Colbert / Junction shuttle trains to Tipperary Town to serve the needs of commuters.</p>	Noted. Waterford added to RL1.
Rail	RL10 - Rail Lines and Greenways	NTA-C7-76 NTA-C7-81	Greenways should not compromise rail	<p>NTCRP believes that any proposed greenways should not compromise any existing or mothballed lines. Also, the provision of greenways adjacent to existing operational rail alignments should not compromise existing line speeds and safety or prevent future upgrades to higher line speeds or enhancements to rail infrastructure</p>	Noted. It was not the intention of the NTA to compromise the delivery of any rail services or infrastructure where their viability has been demonstrated. No change required.

Rail	RL10 - Rail Lines and Greenways	NTA-C7-9	Support for Mungret Line as a Greenway	There is a disused rail line which was used originally as a link between Mungret Cement and Colbert rail station. the spur line links from Colbert Station via Rosbrien, Dooradoyle, Ballykeeffe and Mungret. The rail line passes many existing and new housing estates and offers significant potential to be developed as a green route. Mungret cement no longer require or use the line for many years and it now offers a wonderful opportunity to develop this urban greenway which will compliment the councils current active travel and smarter travel projects	Noted. The LSMATS provides for the protection of the Mungret corridor for future use as a rail line. No change required.
Rail	RL10 - Rail Lines and Greenways	NTA-C7-2	Rathkeale to Ballingrane	I believe that the existing Greenway should be extended along CIÉ property from Rathkeale to Ballingrane Junction from where a rejuvenated Foynes-Adare-Limerick rail corridor is wide enough to accommodate "Rails with Trails"	Rathkeale and Ballingrane are outside the LSMA. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-11	Rail Assessment Work	While the LSMATS Rail Assessment is greatly welcomed and is extremely thorough in many aspects; it does seem to contain a major flaw in that it bases its capacity and therefore cost and cost-benefit analysis on the use of traditional heavy rail commuter networks such as the DART. A significantly more appropriate and cost effective solution would be to use light rail systems such as the Citadis 502, currently in use by the LUAS system in Dublin	The assessment was undertaken using the appropriate rolling stock in use on the national rail network by Irish Rail. Luas trams cannot use the existing tracks in the LSMA and would require replacing the network in Limerick with tram lines. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-39	Ballybrophy line	We recommend that once the current upgrades to the line are complete, a revised timetable to better serve commuters should be put into place. Commuters would then be incentivised to use the line more often.	Noted. This is a matter for Irish Rail operations and supported by measure RL3. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-80	Support for rail investment	I am making this submission as we need to have rail options within Limerick city and subarbs and also rail options out as far as Shannon. I travel to Shannon from Patrickswell by road to work and i notice the majority of cars have only the driver so many cars could be taken off the road if a rail option was available. We need urgently to reduce our transport emmissions so the rail infrastructure is vital to have in place.We as a country are far behind other european countries in providing options other than road transport. Reinstating the limerick to Foynes rail line should also be linked to Charleville to give a viable alternative to the current very slow journey via Limerick junction to Cork	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-39	New station at Annacotty	We welcome the plan for new stations in Moyross, Ballysimon and Oola, and believe that a new station should be added on the Ballybrophy line outside Annacotty prior to the junction that connects it to the Limerick-Limerick Junction rail line.	Noted. Covered under RL3. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-24 NTA-C7-26	Shannon Rail Line	Rail connection to Shannon Airport to compliment direct bus connectivity.	Noted. Covered under RL3. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-73	Foynes line and Moyross station	I would like to request that LSMATS includes a plan to consider the use of the Limerick to Foynes rail line for passanger trains. I would also like to voice my support for a railway station in Moyross.	Noted. Covered under RL3. No change required.

Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-59	New train station	A train station is also necessary for Corbally given the traffic congestion on the Corbally road at morning and evening peak times and the constraints on the main Corbally Road.	Noted. Covered under RL3. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-87	Opposed to rail investment	The over emphasis on rail is a testament to ideology over practicality, it will see scarce resources wasted for little benefit to the commuters and residents of Limerick	Noted. The immediate priorities for the LSMATS, as set out in Chapter 19, include BusConnects Limerick, the cycle network and the City Centre Traffic Management Plan.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-22	New station at Annacotty	I propose another station close to University of Limerick, around Annacotty business park.	Noted. Covered under RL3. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Implementation of improvements to Ballybrophy line	We believe the objectives in Chapter 19.5.4 Rail Network MUST be revised as part of the final strategy, to include specific short- and medium-term targets for service enhancements on the Limerick to Ballybrophy line	Noted. Change made to report.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-58	Support for dualling and Shannon Rail	With regards to rail options I would like to express my strong support for Option 4. A dual line would help to further expand the local economy, allow frequent rail travel to Shannon either coming from Galway or Limerick. Although if the budget is limited, I would much rather see Option 2 being implemented as the rail connection to Shannon and the airport are essential in my humble opinion.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-9	Open Foynes Line for the Ryder Cup	I also wish to support calls by Cllr Fergus Kilcoyne that the Limerick to Foynes rail line be reassessed for commuter traffic to help manage the transport needs for the 2027 Ryder Cup.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-77	Support for Foynes Line	A pattern of commuter services originating/terminating at Foynes could be interwoven around the Limerick Metropolitan Network, such as direct to/from Shannon/Ennis and also to Limerick Junction/Tipperary Town and to/from Ballybrophy. Such passenger services will provide a real benefit to the general public in the extended Metropolitan area.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-81	Newport station	the biggest omission here is not including the proposed station at Newport Road on the Limerick to Ballybrophy. However, the strategy fails to integrate the proposed M7 Newport Park and Ride with the proposed railway station. The strategy needs to revise this and have both the proposed station and Park and Ride as an integrated bus/rail/car interchange to be funded and delivered as part of option 1.	Noted. Change made to report.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-81	West Limerick parkway	The provision of passenger services on the Foynes line should be extended as far as Ballingranne/Rathkeale area if option 3 is funded. However, such a station developed West of Adare near the N21 and should be branded as West Limerick Parkway. The NTA's proposal is to provide ultimately at peak an hourly Limerick-Dublin service, if a West Limerick Parkway station was delivered, some intercity services could start at this station, serving Adare and Patrickswell and Limerick before running to Dublin as a direct intercity service. This could improve usage and act as	These areas are outside the LSMA. No change required.

				a station for West Limerick (Newcastle West, Abbeyfeale) and North Kerry (Listowel).	
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Serving UL and Plassey	We note the failure of the draft strategy to integrate rail services and serve the University of Limerick campus and Plassey Business Park in conjunction with local bus routes and believe that this should be integrated with measure BC1 and BC 10.	Noted. Interchange with rail, as appropriate, will be a consideration in the review of the Limerick metropolitan bus network.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-10	Support for Shannon/Ennis to Mungret line	the railway line from Ennis/Shannon to Mungret should be the top priority.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-77	Support for Shannon high speed rail	The potential for creating a new high speed rail loop via Shannon has not really been explored. Such a loop line should see a significant growth in the number of passengers for Shannon Airport benefit the Airport, Airlines serving it and industry and tourism in the Limerick Shannon Metropolitan area with significant benefits for neighbouring towns and cities to Galway.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-10	Develop rail for Ryder Cup	When the Mungret station is finished, continue out to Adare so we are ready in time for the Ryder Cup.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Support for investment in Ballybrophy line	we do need the NTA as the procuring authority to be proactive in developing regional and rural rail and integrating it with local bus services - rather than the current do minimum approach or a solely bus-based approach for the region.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-75	Support for rail	As part of the LSMATS, I welcome a renewed focus on the delivery of an upgraded rail network in Limerick and the surrounding metropolitan area. In the short term, a passing loop/second platform at Sixmilebridge would allow for significant upgrades to the existing Limerick-Ennis line.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.

Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-10	Mungret Station	The Mungret station will need to be top spec. Not because it's in Raheen but for the number of passengers it will need to handle daily. Common sense is needed here. I would build a station to handle four times the expected daily amount. A concert in Thomond on a Wednesday evening, RIE workers going home, concert-goers decide to get off to go to the Crescent for drinks and food, and two cruise ships sail into Foynes. People might go to the Crescent if they are rural residents or cruise ship passengers. It's all hypothetically of course but it's possible	Noted. The development of public infrastructure to cater for 4 times the projected demand is unlikely to provide value for money. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-1	Need for dual-tracking	While good to see new rail, the proposed continuation single-tracking of most of Limerick is unacceptable. Dual-track is the bare minimum. I would like to see as extensive a rail network as possible.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-10	Train to UL	Next, I would do a train line to UL for obvious reasons. After those two are done the rest can be done one by one. The first two benefit the local economy the most and both lines need to be very cheap or free in my opinion	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-55	Development not required for Rail investment	Iarnród Éireann does not believe that the delivery of these lines to rail passenger standards is contingent upon the appropriate level of development in the relevant areas at a future date to support and justify this provision. Undoubtedly further compact growth will occur upon the introduction of a frequent rail service offering.	Noted. The analysis undertaken by the NTA demonstrates the challenges in developing a comprehensive rail network in the LSMA in a largely low-density, low-population, dispersed environment, and where historical development patterns and prevailing policy does not seek to develop in a manner that is integrated with the potential rail network. It would not be prudent to invest significant sums of money in infrastructure and services without commitment to the delivery of supporting integrated land use development which would provide the passengers and necessary revenue. Measure RL3 strikes the appropriate balance between the aspirations for a comprehensive rail network and the on-the-ground reality of the LSMA and seeks, over time, and in cooperation with the planning authorities, to move towards a scenario which is more suited to investment in rail as a viable mode for the LSMA. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Prioritise RL3	NTCRP believes that Measure RL3 should be made a priority as part of the delivery of phase 1 of the strategy and that the NTA should include sufficient PSO funding for additional services on the Limerick Ballybrophy line in its 2023 budget. It should be noted again that the base timetable on the line has not changed since the fuel emergency in 1947 – 75 years ago.	Noted. This is already included in Phase 1.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-66	New stations	We need to see more stations being delivered in the short term on the existing used rail lines and stronger wording on these objectives would be very welcome.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.

Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-83	Support for passenger services on Foynes line	It makes sense to develop the line to passenger standard, given the large number of settlements along the route, namely Raheen, Patrickswell, Adare, Rathkeale, Askeaton and Foynes. These towns all currently generate significant private car traffic in the direction of Limerick City (including Raheen) and all are also strong candidates for Transit Oriented Development.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-19	Implement higher densities now	rather than waiting for post 2040 for such an approach to become feasible, we would respectfully suggest that the NTA could proactively engage with the relevant local authorities to ensure the current and future statutory Development Plans would contain the appropriate the policies to support and promote higher densities of housing and employment along the identified rail corridors as set out in the revised draft LSMATS.	Noted. It is the intention of the NTA to engage with the planning authorities in order to seek significant changes to land use policy across the Mid-West in order to support Transit-Oriented Development in the LSMA.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Support for Phase 2 rail network	NTCRP would like to see the early adoption of Option 2 (Shannon rail link) and Option 3, the reintroduction of passenger services to Adare on the Foynes line. It is important that the timetabling for additional services on additional lines are integrated with services on the Limerick to Ballybrophy line.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-45	Support for Shannon Rail Line	However, it is crucial that is such a line is created that a spur that turns toward Shannon Airport is developed in conjunction. Such a spur would allow both passenger and freight cargo to travel to and from Limerick City to the Airport. This has the potential to reduce traffic on the main road route and create economic investment opportunities both in Limerick and north Clare.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-66	Foynes line	the Foynes line has a potential far beyond freight. It should be utilised for passenger services as a priority.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-83	Support for station at Dooradoyle	The spur off the Limerick to Foynes line, to Mungret, passes the Crescent Shopping Centre and near to University Hospital Limerick, both of which are responsible for many thousands of car journeys daily, between staff, shoppers and day patients. For this reason the Dooradoyle station should be considered for the Phase 1 network. Another station on this line, at the Crescent Shopping Centre, should be considered given the significant development potential there.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-19	Move Dooradoyle station	we would respectfully request that this proposed Dooradoyle station would be re-sited to the east of the Ballinacurra Road where it would be in close proximity to both the designated District Shopping Centre and the existing bus and cycle corridors, to facilitate modal interconnectivity	Noted. The location of stations will be a matter for project level assessments.

Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-76	Open Foynes line for Ryder Cup	It is noted that the Ryder Cup will be held in Adare in 2027 and this should be the target for the delivery of rail services on the Foynes line.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-4	Support for Shannon Rail Line	I believe it is integral to the future of the entire region that a rail link is built between Shannon Airport and Limerick/Ennis.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-38	Open Foynes Line for the Ryder Cup	the Ryder Cup golf at Adare is not mentioned. This would certainly be a catalyst for re-opening the railway to prevent huge traffic congestion in Adare whilst the tournament takes place	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-68	Shannon rail line	<p>The Draft LSMATS, the National Development Plan and Irish Rail have all indicated that the possible rail line to Shannon might include a new route through Cratloe and onto Bunratty as per the Schematic Map below. Aside from a cost benefit analysis that accompanies the Draft LSMATS Clare County Council is not aware of any other studies or information that may have informed the line of the route now proposed. There does not appear to have been any assessment of the viability of constructing a railway alignment between Cratloe, Bunratty and Shannon. The mapping appears to plot the alignment in indicative fashion along existing roads.</p> <p>Should the NTA considered it necessary or prudent for Clare County Council to include this revised Schematic line as an infrastructural safeguard in the upcoming development plan then they should advise the Council of same immediately. the inclusion of a rail alignment from Cratloe to Shannon Airport appears to be premature until such time as a comprehensive evaluation of the delivery of the Shannon Rail Line, as an element of the project to deliver the Limerick Suburban Rail Network is completed.</p>	Noted. The alignment in the LSMATS is indicative only and is not intended to provide direction to the local authority. Change made to mapping,
Rail	RL3 - Limerick Commuter Rail Network	NTA-C7-39	Foynes line	the reopening of this line to passengers would connect regional towns and villages such as Adare, Rathkeale, Asketaon and Foynes with the regional and national rail network. We strongly recommend this.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL4 - Foynes Line and Rail Freight	NTA-C7-81	Rail freight in LSMA	This is a key objective and needs to be funded and delivered as soon as possible in conjunction with Iarnród Eireann 2040 freight strategy and the Shannon Foynes Port Company 2040 masterplan. Once funded it can be delivered within 24-30 months and should be delivered by 2027. However, a notable absence is the failure of the strategy to provide passive provision for a potential railfreight facility in the Greater Limerick City either near the Raheen industrial estate on the Foynes line, Ballysimon Industrial estate on the Limerick to Limerick Junction line or at Mungert on a revitalised cement factory line. The strategy should include passive provision for a railfreight facilities in LSMATS region.	Noted. Change made to report.

Rail	RL4 - Foynes Line and Rail Freight	NTA-C7-76	Role for Ballybrophy line in rail freight	In the context of rail freight, we believe that the Limerick to Ballybrophy line has a role to play in delivering capacity to allow rail freight to grow and provides an alternative route to Dublin, allowing rail freight to avoid the Dublin Cork main line.	Noted.
Rail	RL5 - Rail Based Park and Ride	NTA-C7-76	M7 Newport Park and Ride	the strategy fails to integrate the proposed M7 Newport Park and Ride with the proposed railway station. The strategy needs to revise this and have both the proposed station and Park and Ride as an integrated bus/rail/car interchange to be funded and delivered as part of option 1.	Noted. Change made to report.
Rail	RL7 - Supporting Rail Measures	NTA-C7-76	Signalling and level crossings	NTCRP agrees with this objective. In order to deliver this, an early commitment needs to be made by the NTA and the Department of Transport to modernise the signalling and automate the level crossing on the route. The automation and recontrolling of all 12 attended crossings on the Limerick Ballybrophy line to Mallow signalling centre should be made a priority	Noted. No change required.
Rail	RL7 - Supporting Rail Measures	NTA-C7-81	Support for expediting measure	This needs to be expedited immediately. There is currently no live realtime information at station on the Limerick Ballybrophy line. The Limerick to Ballybrophy line needs to complete its upgrade to include funding to provide full automatic barriers at all 12 manned level crossing and recontrol to Mallow signalling centre. The Limerick to Ballybrophy line needs to be resignalled from the existing semaphore signalling and should be a test bed location for the initial roll out of the new ERTMS which will be rolled out across the network. In the short term the passing loop needs to be reinstated at Nenagh to allow the delivery of both a half hourly Limerick commuter service and a hourly service on the rest of the route. On the Limerick- Ennis line funding needs to be put in place for a passing loop at Sixmilebridge, this will be in addition to the planned loop for the proposed Moyross station.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Rail	RL8 - Flood Management at Ballycar	NTA-C7-81	Support for addressing Ballycar	This needs to be funded by the OPW and allow the work to be delivered. This should be planned and delivered with any infrastructure upgrade such as the provision of a passing loop at Sixmilebridge.	Noted. Covered under RL8 and under development by Irish Rail.
Rail	RL8 - Flood Management at Ballycar	NTA-C7-45	Flooding at Ballycar	A pre-requisite action for the viability of an intra-county rail network would be remedial works being completed at Ballycar on the existing Limerick-Galway line. This location is affected by flooding on an annual basis, often leading to the closure of the line sometimes for months on end. The state needs to take charge and invest the funds that will remedy this flooding issue. Without this commitment the line will remain underused. It cannot be left to Iarnród Éireann or Clare County Council to resolve this issue.	Noted. Covered under RL8 and under development by Irish Rail.
Rail	RL9 - Electrification and Alternative Fuelling	NTA-C7-56	Greater ambition in electrification	While the proposed electrification of the rail network is welcome, greater ambition is needed in this area, as part of a journey towards the full electrification of the national rail network.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.

Rail	RL9 - Electrification and Alternative Fuelling	NTA-C7-1	Need for full electrification	25kv AC electrification is the new standard for urban rail across the world, and it is not the place for us to try and reinvent the wheel. Battery electrification is not the right solution.	The NTA and Irish Rail will assess all matters related to electrification and rolling stock in detail as the project is developed. No change required.
Rail	RL9 - Electrification and Alternative Fuelling	NTA-C7-81	Support for electrification	A rolling programme of Electrification should commence starting with Limerick to Limerick Junction. BEMU's should be considered for the greater Limerick area. However it is likely in the short to medium term any additional services introduced will be from cascade diesel rolling stock from the greater Dublin area.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required. The NTA and Irish Rail will assess all matters related to electrification and rolling stock in detail as the project is developed. No change required.
Rail	RL9 - Electrification and Alternative Fuelling	NTA-C7-76	Support electrification of Ballybrophy line	The NTCRP would like to see a rolling programme of electrification which includes the Limerick to Ballybrophy line in the long term. In the medium term, as battery technology improves, we would like to see the introduction of BEMU units on the line.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required. The NTA and Irish Rail will assess all matters related to electrification and rolling stock in detail as the project is developed. No change required.
2. Bus					
Bus	BC1 - BusConnects Limerick	NTA-C7-51	Support for ART	A cheaper alternative to a light rail or traditional tram is a trackless tram or Autonomous Rapid Transit; essentially a tram with rubber tyres that uses lidar sensors to follow painted lines on any road surface. There are no requirements for planting of tracks, thus, cost of construction is roughly a quarter of cost of construction of light rail.	Noted. The NTA is satisfied that the forecast demand up to 2040 can be catered for by BusConnects Limerick. This will be reviewed during the periodic updating of the LSMATS.
Bus	BC1 - BusConnects Limerick	NTA-C7-56	Bus measures and business	Measures aimed at reducing general traffic from areas of the City (O'Connell Street and Sarsfield Bridge) to eliminate delays to bus services should not negatively impact upon business activity or disturb last-mile delivery for businesses located nearby	Noted. The NTA and Limerick City Council will take full account of delivery requirements across the city and balance these needs with the objective to deliver a more pedestrian-friendly environment and a transport network that delivers the maximum number of people into the centre for shopping, work, socialising etc.
Bus	BC1 - BusConnects Limerick	NTA-C7-33	o'Connell Street	Removal of plans for two-way bus lanes on O'Connell Street, which is completely unsuitable for this location and at odds with significant efforts by various business and community groups to create a destination at the heart of the city centre.	Noted. The rationale for O'Connell street as the preferred option is set out in the report. A full bus network redesign will commence shortly and will be subject to public consultation. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-35	Bus priority	Another major issue with bus routes is that the bus lanes are intermittent and the buses frequently get stuck in traffic; it may be worth considering restrictions in some areas for cars to allow more free flowing of bus routes and cycling; however given the narrow nature of some streets this may not be feasible.	Noted. Covered under BC1. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-76	Bus /Rail interchange	Measure BC1 should have the objective to interchange where possible with rail services.	Noted. Covered under SM10 and language altered to provide clarity.

Bus	BC1 - BusConnects Limerick	NTA-C7-75	Support for BusConnects	I welcome proposals for an upgraded bus service under BusConnects which should interchange with the rail network at key points allowing for a fully integrated transport network. Included in future BusConnects routes should be orbital routes between key areas such as UL, TUS and UHL/ Raheen Industrial Estate without travelling via the city centre.	Noted. Covered under SM10 and language altered to provide clarity. Orbital routes are also covered under 10.5.2.3 and bus network changes will be subject to public consultation.
Bus	BC1 - BusConnects Limerick	NTA-C7-86	autonomous shuttle buses	Limerick city centre is an ideal urban environment for autonomous shuttle buses	Noted. Autonomous vehicles are covered under SM7 and there are no plans to introduce driverless public transport on-street. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-66	Need for BusConnects	While the bus service provision in Limerick needs to be reviewed and improved urgently, the efficiency and reliability of existing services could be greatly improved in the peak time without the costly and engineering challenge that is Bus Connects. There are simpler and cheaper ways of reducing non-strategic traffic on strategic public transport corridors and thus reducing the congestion and increasing the flow of public transport, namely, making it safer for pupils and students to walk or cycle independently (without the need for a car) to their places of education, by building a safer, people centred walking and cycling network that does not prioritise traffic flow over safety of people.	Noted. The NTA intend to deliver an efficient bus service network in the LSMA whereby journey times for all passengers are as reliable as possible at all times of the day, in addition to endeavouring to reduce the numbers of parents who drive their children to school. Providing bus priority, in its many forms, is the optimal way to achieve this. The LSMATS also provides for the development of cycle infrastructure throughout the LSMA and improvements to the pedestrian network. Additionally, there are a number of measures related to travel to school specifically which provide for a mix of land use planning policies, design, layout and behavioural change. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-10	Support for Bus Gates	What I will suggest are more bus gates. 1. Sexton St during school hours to keep school kids much much safer. 2. Any school that is on a side street could be a bus gate. 3. Parnell st is another one and hopefully it could help fix the debacle that is Parnell st.	Noted. Bus gates will be provided as appropriate as part of BC1. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-64	New bus / cycle and ped link from M20 interchange to O'Callaghan Strand	New link proposed as an alternative to reallocating capacity	Noted. In order to deliver a competitive advantage to sustainable modes, it will be necessary to reallocate space from the private car. Providing significant additional roadspace for sustainable modes as suggested, as a means of protecting capacity for the private car, would not deliver the modes shift required along this corridor. As presented, this proposal would likely to include significant land acquisitions, demolitions, and would have a significant adverse impact on the environment. It is not proposed to include this objective in the LSMATS. No change required.
Bus	BC1 - BusConnects Limerick	NTA-C7-24 NTA-C7-26	Prioritise Ballysimon and NTP/UL Corridors	Priority development of strategic corridors from NTP/UL to city centre and from Ballysimon Road to city centre	Noted. No change required.
Bus	BC10 - Local Link Services	NTA-C7-76	Interchange between Local Link and rail	The NTCRP believes there is an opportunity to link the local bus network with local rail services. However, we note that in this strategy there does not seem to be any bespoke proposals to integrate either the proposed bus network or Local Link services with the proposed rail network and proposed new stations as outlined in options 3 and 4. While it sits outside the area of the LSMATS strategy, bus services should, in addition to Castleconnell, also link into rail services at Birdhill, thereby connecting Killaloe/Ballina.	Noted. Covered under SM10 and language altered to provide clarity.

Bus	BC12 - Bus Stops and Shelters	NTA-C7-7	Need for more bus stops	<p>From my observations, as a native of the City, the number of bus stops in and around the City Centre is still at late 1970s - 1980s levels and the distances between stops is the same or even greater.</p> <p>My recollection is that, in the 1950s and 1960s there were actually more stops in the City Centre and its inner suburb, with better distancing between them.</p> <p>Another problem caused by the inadequate number of bus stops, is that stops can become congested with buses and passengers trying to board them.</p> <p>Most of the extended stopping area is not designated to any particular route or service. People with impaired mobility may have to run and push their way through crowds to get to their buses on time.</p> <p>Adding to the access and congestion problems at Arthur's Quay, is the parking of buses, for hours, by some private operators. There needs to be prohibition on this type of behaviour.</p>	Noted. The location of stops will be considered as part of BusConnects Limerick. Covered under BC1. No change required
Bus	BC12 - Bus Stops and Shelters	NTA-C7-27	Connections to bus stops	This LSMATS should target specific improvements in such instances, improving the bus stop network and the infrastructure (footpaths, safe crossing points, lighting) connecting and adjacent to and from affected bus stops in the region.	Noted. The location of stops, their design and supporting infrastructure will be considered as part of BusConnects Limerick. Covered under BC1. No change required
Bus	BC12 - Bus Stops and Shelters	NTA-C7-39	Install RTPI and shelters at all stops	Section 10.10 of the current draft notes a plan to install more Real Time Passenger Information (RTPI) along new bus corridors and elsewhere across the region. We recommend that all current bus routes within the LSMA be fitted with these signs, with bus shelters at all current stops. Several current bus routes within the LSMA do not have RTPI and/or shelters,	Noted. The location of stops, their design and supporting infrastructure will be considered as part of BusConnects Limerick. Covered under BC1 and BC12. No change required
Bus	BC2 - O'Connell Street	NTA-C7-83	remove traffic from O'Connell Street	Street in the timeframe of LSMATS. Measure BC2, which seeks to lock in O'Connell Street as a bus corridor, sells Limerick short. O'Connell Street has very high heritage value and high retail potential and both are diminished by the presence of motorised traffic on it. It is preferable that busses instead are routed on Henry Street, William Street, Gerald Griffin Street, Parnell Street and Mallow Street. In this way passengers will never be more than 250 metres from a bus route and O'Connell Street would become a much more attractive, thriving and people-oriented. Measure BC2 unnecessarily condemns O'Connell Street to a future dominated by busses.	Noted. The rationale for O'Connell street as the preferred option is set out in the report. A full bus network redesign will commence shortly and will be subject to public consultation. No change required.
Bus	BC3 - Sarsfield Bridge	NTA-C7-64	Opposed to traffic removal from Sarsfield Bridge	Closure of bridge would send more businesses to suburbs	Noted. It is not proposed to close the bridge. It is proposed to dedicate it to higher capacity modes which can bring more people into the city centre than the private car. No change required.
Bus	BC4 - Thomond Bridge and Shannon Bridge	NTA-C7-64	Clarity on measure	Need to explain intentions for these bridges. language too vague	Noted. Appropriate clarity is already provided in supporting text. No change required.

Bus	BC6 - Short-Term Bus Network Review	NTA-C7-56	Consultation on bus route changes	Any proposed changes to the existing bus network, both long and short term, should be consulted and communicated with businesses and local communities in a timely and appropriate manner	Noted. BusConnects Limerick network review will be subject to public consultation. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-34	Links from Raheen to City Centre	It is our opinion that a bus service within the city directly feeding around the industrial estates on a 15min basis from 7 - 9 am and 4.30 to 6.30 pm would be really beneficial in allowing our employees and other companies employees to choose to use the city bus network.	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-65	Bus route detail	On a point of detail, we wish to draw the Authority's attention to the alignment of an additional indicative bus route traversing the south-eastern section of the Towlerton lands, as shown on the maps below. We submit that this indicative route is superfluous, and we request that the transport strategy maps are revised to omit the bus network route along the section traversing the south-eastern section of the Towlerton Opportunity Site lands, as highlighted	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-63	Extend the 301 bus route to Mungret church	The 301 bus currently terminates on the Fr. Russell Road. This means that for some of the time a bus is forced to stand still on a narrow section of the road, constricting the flow of traffic, but also not serving the communities of estates, schools, and the village of Mungret further along the same road. Providing better service to the estates there, to the schools already fully established, and to the people of Mungret village, would be a huge boon.	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-40	Additional stop in Shannon	that bus services to Shannon Free Zone should also include a stop(s) at Westpark – this is an expansive business park and set to be extended. It is imperative that a frequent public transport service be provided to this key employment area of the Shannon Free Zone, owned by Fine Grain Property.	Noted. Covered under BC6 and BC9. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-35	Expand the 301 bus service	I think there is a lot of scope to expand or create new bus routes. The 301 bus stops at Arthur's quay but when the new opera site development is completed I think it would add a lot of value to have a stop going to and from this new site as it would serve a large number of people using the new facilities. It should also be expanded to have stops at the schools in Mungret.	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-35	Orbital bus	Similarly it would be very helpful to have a ring bus route linking the outer areas of the city directly rather than having to go through the city centre and then out again. A good example is trying to get from say Dooradoyle to Roxboro if you cannot drive.	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-24 NTA-C7-26	NTP to UL	Complementary LSMATS connectivity measures between the NTP and UL.	Noted. It is the intention of the NTA to ensure maximum connectivity between all major trip generators and attractors in the LSMA through enhanced bus services provided for in particular under BC1 and BC6, and enhanced cycle infrastructure. No change required.

Bus	BC6 - Short-Term Bus Network Review	NTA-C7-3 NTA-C7-5	UL Bus Services	Traveling from UL to Corbally. and vice versa, for someone with a physical disability is not practical. Public transport does not provide a viable service to Corbally. Also there is no direct connection to Caherdavin, Childers Road and Ballysimon road.	Noted. Covered under BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-41	Bus network not consistent with NTA guidance	the proposed bus network for Limerick consists of a series of meandering routes optimised for coverage with few interchange possibilities. Exacerbating this is a proposed traffic arrangement for the city centre which insists on directing buses through O'Connell St, away from the bus and rail station and preventing effective interchange between services.	The proposed bus network is indicative. A revised network will be published for consultation in the early stages of the LSMATS implementation and will seek to balance the need to deliver the maximum number of people to workplaces and businesses in Limerick City Centre with the objective to provide interchange with Colbert station. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-39	Bus services in east of city	the areas of Castletroy, Monaleen, Annacotty, and Goody (covered by A1, A2, B1, B2), there has been no increase in service frequency. We recommend that all routes in this area have their frequency increased: o Routes that are projected to be delivered every 30 minutes should be increased to at least every 20 minutes. o Routes that are projected to be delivered every 20 minutes should be increased to every 15. These routes are often overcrowded at key stops and the route marked by B1, currently run by a private operator, has been the subject of complaints around a consistent failure to deliver the projected service. We believe that these routes should be delivered by Bus Eireann	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-3	UL Bus Services	Bus Transport from UL to city centre is not practical as it takes too long.	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-45	Bus services on Condell Road	That priority be given as a matter of urgency to provide a new bus service to serve the new residential developments on the Condell Road and to include Coonagh and the new TUS campus at Coonagh Cross. It is important to consider the location of the local primary and secondary schools in the area when determining a route. Currently families without transport are having to walk 30 to 35 mins to the primary schools in Caherdavin and 45 minutes to Thomond Community College from the new development at Moineir	Noted. Covered under BC1 and BC6. No change required.
Bus	BC6 - Short-Term Bus Network Review	NTA-C7-31	Extend bus service to Mungret	If a bus service was extended to Mungret, several of the parents of the schools have indicated that they would use it instead of their cars for the school run. With several new estates being planned for the area between Mungret and Patrickswell, the introduction of a bus route sooner would influence the travel decisions of the incoming residents. If we wait until they've already bought 2 cars per household, then they will use those cars and sit in traffic rather than use public transport.	Noted. Covered under BC1 and BC6. No change required.

Bus	BC7 - Bus Service Network Monitoring and Review	NTA-C7-56	Need for flexibility	The Transport Strategy must allow for flexibility to introduce new measures and initiatives as transport patterns change and develop. Innovation, alongside long-term planning, must underpin the provision and continued development of bus services across the LSMA. It will be essential to continually monitor the demand for bus services in the LSMA throughout the lifetime of the LSMATS and enhance or amend the service network as appropriate	Noted. Covered under BC1, BC6 and BC7. No change required.
Bus	BC8 - Regional bus Networks	NTA-C7-27	Links between Shannon and Limerick, Cork and Galway	In particular, the strategy should focus on improved direct inter-regional connectivity between cities along the Atlantic Corridor and Shannon Airport.	Noted. The focus of the LSMATS is on the Limerick-Shannon Metropolitan Area. Inter-regional connectivity is covered under a combination of BC8, BC9, RL1. No change required
Bus	BC8 - Regional bus Networks	NTA-C7-27	Better service between Shannon and Limerick	In order to improve the option of public transport as a viable alternative to the use of the private car for travel between Limerick City and Shannon, development of a higher frequency and more efficient service, of c. 30 minutes duration between the city and the airport at times linked to flight arrivals and departure, is desirable.	Noted. Covered under BC9 and section 10.7.
Bus	BC8 - Regional bus Networks	NTA-C7-27	Greater detail on regional bus measure	The Group suggests that the provision of additional services should be embedded as a specific policy objective, which would help ensure their delivery in the short-term. The Group encourages the National Transport Authority (NTA) to expand upon Objective BC8, which states that “it is the Intention of the NTA and the local authorities to maintain and enhance regional bus networks in line with the emerging “Connecting Ireland” programme”, by indicating a number of key direct routes, including but not limited to a direct service between Galway and Shannon Airport and Cork City and Shannon Airport	Noted. The measure quoted is appropriate for the LSMATS. Further detail is provided within the programme itself. No change required.
Bus	BC8 - Regional bus Networks	NTA-C7-39	Bus services to Dublin	We recommend that new direct services to Dublin also be included as a central plank to this section of the plan. There is no direct public bus route from LSMA to the capital.	Noted. Details of additional non-stop services on the Limerick-Dublin route is an operational matter. Inter-regional and inter-city connectivity is covered under a combination BC8, BC9, RL1. No change required
Bus	BC8 - Regional bus Networks	NTA-C7-45	Bus services from outlying towns	The bus network in LSMA needs a significant upgrade. However, we contend that it is an opportunity to consider enhanced bus lanes and services in and out of the city from outlying towns such as Newport, Caherconlish and Murroe. Such towns have many residents who work and socialise within Limerick City. With the current timetables from these locations, an over-dependence on private vehicle transport is inevitable. An increase in the services on these radial and local link services should be considered as a priority. The infrequency of services from such towns is a significant deterrent for residents who would otherwise consider public transport.	Noted. Covered under BC1 and BC8. No change required.
Bus	BC9 - Shannon Bus Connectivity	NTA-C7-27	Coordination of bus and flight times	Effective coordination of these services with Airport flight times and Shannon Campus operating hours is critical.	Noted. Covered under BC9 and section 10.7.
Bus	BC9 - Shannon Bus Connectivity	NTA-C7-40	Shuttle from Sixmilebridge to Shannon	We welcome the fact that consideration has been given to the provision of a shuttle bus linking Sixmilebridge and Shannon and has been included in the Revised Strategy	Support for strategy measures is noted.

Bus	BC9 - Shannon Bus Connectivity	NTA-C7-27	Bus services into Shannon employment areas	The proposed 2040 Bus Network Map does not, however, appear to include designated routes through the main employment centres within Shannon. The Group strongly recommends the inclusion of these designated routes for delivery in the short term. They provide essential enhanced connectivity to the main employment centres including, Shannon Airport and Shannon Free Zone.	Noted. This map is indicative and does include a routeing through the free zone. Covered under BC1 and BC9. No change required.
Bus	BC9 - Shannon Bus Connectivity	NTA-C7-56	Improve Shannon bus service	There is also considerable potential to improve public transport access (especially bus and coach) across the Shannon Campus (Airport and Free Zone).	Noted. Covered under BC1 and BC9. No change required.
Bus	BC9 - Shannon Bus Connectivity	NTA-C7-45	Need for investment in Shannon bus services	There is a lack of public transport in Shannon and the Clare region generally. The infrastructure needs to be invested in with bus shelters installed. The primary impediment to the use of the bus network is the bus timetables. Many of the routes, particularly in Clare, are not convenient for work and school drop/pick up times.	Noted. Covered under BC1 and BC9. No change required.
Bus	Bus Stops and Shelters	NTA-C7-27	Improved bus stops	A commitment by the LSMATS, as noted in Measure BC12, to upgrade existing bus stops that do not provide shelter / seating and have waiting patrons blocking the footpath should be confirmed. Shannon Group suggests also that real time bus information screens are provided throughout the bus stop network, mirroring the information available on the Transport for Ireland Real Time Application.	Noted. The location of stops, their design and supporting infrastructure will be considered as part of BusConnects Limerick. Also covered under BC1. No change required
Bus	Tourist bus services	NTA-C7-39	Provide seasonal bus services	The provision of seasonal bus routes connecting the heart of Limerick with local attractions of significant interest such as Lough Gur, Foynes and Adare would incentivise tourists to use the public transportation rather than the use of rental or private cars.	Noted. This is a matter most appropriately dealt with at the local level via the bus licensing system. No change required.
3. Roads and Demand Management					

Roads and Demand Management	Approach to Roads development	NTA-C7-41	Consistency with National Sustainable Mobility Policy	<p>The proposed strategy is not consistent with the National Sustainable Mobility Policy</p> <p>The National Sustainable Mobility Policy sets out a target of a 10% reduction in kilometres driven by fossil fuelled cars by 2030. The Strategy proposes an increase in road capacity through the fact that it “commits to delivering the N/M20 Cork to Limerick Scheme and the N69/M21 Foynes to Limerick Road” as well as proposed roads to open up development lands in the suburbs. The Strategy fails to address any induced demand that will be caused by these projects in the Limerick Shannon Metropolitan Area. Outside of the city centre area, the Strategy fails to identify any measures that could reduce road capacity that would result in traffic evaporation.</p>	The LSMATS has been assessed with the road schemes included and therefore any induced demand has been fully accounted for. Further demand management measures may be required to meet transport and climate change targets and this is a matter for government policy as set out in chapter 17. The NTA are satisfied that the reduction in car mode share that LSMATS is forecast to deliver (70.4% to 46.1%) is consistent with Government policy. The LSMATS includes measures to restrict parking and provides for demand management measures to be derived and applied in the LSMA. No change required.
Roads and Demand Management	General Demand Management	NTA-C7-85	Prioritise demand management	The planning and delivery of the provision of new transport infrastructure and services needs to happen in tandem with immediate carbon emission reductions, and therefore the demand management measures should be prioritised within the structure.	Noted. The NTA intend to prioritise demand management measures in the short term as set out in 19.6.5 and 19.6.6. No change required.
Roads and Demand Management	LNDR	NTA-C7-48	Opposed to LNDR	<p>The Floodplain at Shrivokee, Clonlara, Co Clare.</p> <p>Construction of a ‘distributor road’ through any area will encourage further development in that area. Unfortunately, in the case of the LNDR this would be devastating for future generations.</p> <p>2. Splitting of 2 communities.</p> <p>The Ardnacrusha area and Parteen Village will be detrimentally divided by construction of the proposed LNDR making life for the inhabitants decidedly more difficult on a day to day basis – making access to schools, shops, church and creche more difficult. An increase in pollution in the area due to increased traffic.</p> <p>3. Existing corridors</p> <p>The focus now seems to develop Limerick City around the University of Limerick – on and adjacent to a Flood Plain.</p> <p>4. The City of Limerick</p> <p>Construction of a further ring road around the city will bring the city centre into decline. Many retailers have opted for the Shopping Centres on the alternative ring roads around the city – the LNDR would without doubt administer the final blow.</p> <p>5. Use and enhance what we have</p> <p>Over the 17 years or so since the LNDR appeared on Planning maps, alternative solutions don’t seem to have featured as serious solutions.</p> <p>Previously suggestions have been made by individuals and interested groups to enhance our School Bus System. The main traffic black spot is the Corbally Road leading to the city – once the schools close in the summer – this road is no longer a black spot for traffic. Many of the cars in the</p>	In line with the Minister’s recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister’s Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

				<p>morning have maybe one or two students in them – would an enhanced School Bus System take many of the morning and afternoon traffic off the roads?</p> <p>6.Future The Pandemic has changed how we live and more especially how we work. Working and learning from home is now commonplace and here to stay. We must evolve and adapt to our environment and future – and pursuing a Plan that is now 17 years old is close to ridiculous. The world has changed so much is this time such plans must be revised thoroughly before planning to reinstate them to any County Plan again.</p>	
Roads and Demand Management	LNDR	NTA-C7-6 NTA-C7-25	Opposed to LNDR	Our family are totally supportive of your decision to exclude the Limerick Northern Distributor from this Transport Strategy because of the damage the proposed Road would inevitably cause to the local landscape.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-43	Opposed to LNDR	Bringing a 'distributor road' through a any area will only encourage further development. Unfortunately, in the case of the LNDR this would be devastating for future generations. We have often heard of the 'stone in the bucket' theory - when the soaking sponge action of the floodplain is sealed flow off and flood water will rise.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-59	Alternatives to the LNDR	Given the omission of the second phase of the Northern Distributor Road from the revised draft and from the National Development Plan. Provision must be made to alleviate traffic congestion at the National Technological Park in Castletroy through a redesign of the Mackey Roundabout which is heavily congested at peak times.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-43	Opposed to LNDR	The Ardnacrusha area and Parteen Village will be detrimentally divided by construction of the proposed LNDR making life for the inhabitants decidedly more difficult on a day to day basis – making access to schools, shops, church and creche more difficult.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-49	Support for LNDR	Section 14.4.2 of the Revised Draft LSMATS states that the Limerick Northern Distributor Road (LNDR) is not included in the study. The fast-track delivery of the LNDR is identified as a key enabler in the RSES and Section 4 of the Limerick-Shannon MASP. The RSES identifies that the LNDR is required to benefit regional interconnectivity and regeneration, improve access to the University of Limerick and the IDA National Technology Park and to reduce City Centre traffic. Section 2.2 of the RSES identifies the LNDR/Smart Travel Corridor as a 'key enabler' to deliver the RSES vision and strategy. Given this regional policy emphasis and to ensure consistency with the RSES, the LNDR should be included in the final iteration of the LSMATS. Supporting text should align with the RSES and the delivery of the LNDR should be prioritised.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

Roads and Demand Management	LNDR	NTA-C7-8	Opposed to LNDR	I approve of the LSMATS in its current draft, particularly your decision to exclude the Limerick Northern Distributor Road (LNDR) from this Transport Strategy.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-51	Opposed to LNDR	The exclusion of the LNDR scheme is very positive for the sustainable growth of the inner-city centre. Poor planning of developments within Limerick have hugely hindered the economic development of the city centre and resulted in a lot of urban sprawl around the city outskirts.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-79	Support for LNDR	It's essential that the Limerick Northern Distributor Road (LNDR) is added back into the LSMATS, creating an infrastructure that navigates around the city, removing traffic facilitating the safe use of bike lanes etc within the city. This much need infrasturcture needs to be revisited and included back into the LSMATS to ensure the proposed sustainable modes can actually be effective within the city..	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-15	Alternative to the LNDR	While the Limerick Northern Distributor Road (LNDR) has been excluded from this strategy, the LSMATS should include a provision to alleviate this congestion, potentially using slip road from the NTP to the Newport / Mackey Roundabout. The full LNDR does not have to be complete to ease congestion between these two areas,	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-64	Support for LNDR	Rationale for removal is not justified	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-87	In favour of LNDR	A full ring road of the city is needed, this will allow people circle the city and enter to the areas where they need, it'll reduce congestion in the city and allow bike paths and bus transport flourish. Most people working do so in the suburbs, a large majority of people live in the suburbs. A ring road, by keeping traffic out of the centre will make the city more liveable and desirable as a destination.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-43	Alternatives to the LNDR	Over the 17 years or so since the LNDR appeared on Planning maps, alternative solutions don't seem to have featured as serious solutions. Previously suggestions have been made by individuals and interested groups to enhance our School Bus System. The main traffic black spot is the Corbally Road leading to the city – once the schools close in the summer – this road is no longer a black spot for traffic. Many of the cars in the morning have maybe one or two students in them – would an enhanced School Bus System take many of the morning and afternoon traffic off the roads?	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

Roads and Demand Management	LNDR	NTA-C7-24 NTA-C7-26	In favour of LNDR	We wish to express our extreme disappointment on learning that the Limerick Northern Distributor Road (LNDR) is no longer supported in the 2nd Draft of the Strategy. The LNDR is a vital piece of infrastructure for our business, and critical to our future development. It provides the road space to cater for displaced traffic from the city centre, thus facilitating the effective transition to sustainable transport that forms the basis of LSMATS. We believe the LNDR and LSMATS have a complementary synergy and should be developed in parallel.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-43	Opposed to LNDR	We very much welcomed the Ministers decision to remove the Limerick Northern Distributor Road (LNDR) from the above Plan.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-36	Opposed to LNDR	If this development is pushed through, this will destroy the community and the hinterland of Ardnacrusha, Parteen and Clonlara at a time when this is not environmentally, socially, or economically necessary or desirable.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-24	Phasing of the LNDR	Due to the omission of the LNDR in Draft 2, Johnson & Johnson Vision Care, Limerick requests that junction improvements at the Mackey Roundabout and NTP approach be prioritised, pending full completion of the LNDR at a later stage. This should not be interpreted as us accepting the LNDR is no longer required, and we believe a longer-term phased development of the full LNDR should be supported in LSMATS. This phased approach is vital to the continued success of Johnson and Johnson Vision Care in Limerick, the National Technology Park and the wider Castletroy area.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-47	Opposed to LNDR	I was reared in Ardnacrusha, one of the several communities that will be significantly impacted by this proposed construction. Ardnacrusha is my home and I have spent the entirety of my youth outdoors in the local forest and availing of other amenities in the area like the tennis court, pitch and putt and badminton court. With this proposed road, these places will be destroyed to facilitate another unneeded project that ultimately adds no value. I cannot watch this happen.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-29	Opposed to LNDR	The Parteen/Clonlara group of concerned residents have raised several serious issues against the inclusion and construction of the proposed Northern Distributor Route in the NTA over a number of years, in particular Phase Two. At the core of these concerns is our belief that Phase Two will lead to the destruction of our two communities and untold havoc in terms of fractured community supports and social networks which are at the heart of life in this area of South East Clare.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

Roads and Demand Management	LNDR	NTA-C7-24	Prioritise Corbally corridor	A delayed phased construction of the LNDR has serious implications for traffic coming from the Corbally area to the city and the National Technology Park, as this approach currently experiences long queueing delays. Johnson and Johnson Vision Care Limerick, strongly recommends this approach to the city be given priority for early treatment and the NTA should consider the viability of a strategically placed Park & Ride on the Corbally approach.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-44	Opposed to LNDR	<p>Ties to the community The proposed road will effectively split the village of Parteen and Ardnacrusha in two, effectively segregating Ardnacrusha residents from their local communities and amenities they rely on for their day to day lives, including educational and religious resources that need to be easily accessible</p> <p>Nature & Environment The proposed route converges through a green area of conservation which is the only one we have available to both the communities of Ardnacrusha, Parteen, Thomond Gate, Corbally and several other Limerick suburbs on the border of East Clare. This natural parkland and green forest walkway connects Ardnacrusha from the ESB power station and tennis courts to Parteen village at the 'tail race' junction at Parteen bridge. The parkland is self-maintaining and comprises a band of forest approximately 2km long by 1km at the widest point which has been untouched for over a century. It contains many broad leaf varieties of trees, a wealth of indigenous flora and fauna including; peregrine falcons, endangered red squirrels, stoats, otters, rabbits, foxes, hedgehogs, frogs, ducks, herons, swans, deer, migrating geese etc. The proposed road and splitting this natural resource in two would have a devastating impact on the nature in the location as well as a categorical environmental impact. The pollution that would result from having a road in this location would be catastrophic to the wildlife and vegetation in the surrounding areas. We have a duty as citizens of the world and of Ireland to protect and conserve these natural resources, there are endangered species of animals inhabiting the area, it would be catastrophic to engage in any strategy that could potentially damage this incredible resource.</p> <p>Impact on small businesses The proposed development would absolutely destroy the already struggling small business that exist in Parteen and Ardnacrusha, cutting them off from more than half of their customer base. Not only this, but Limerick City is already in a state of severe decline but more and more businesses moving to the larger suburbs. It is our belief that a construction like this would only serve to further this worrying trend, making our suburbs more accessible than</p>	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

				<p>our beloved city.</p> <p>If this development is to go ahead, it will completely destroy thriving communities in East Clare – Ardnacrusha, Parteen and Clonlara. This alone should this be sufficient to block such a proposal however if it is not then we must consider the extremely serious consequences that would ensue from a mental and physical health, environmental and economic perspective.</p>	
Roads and Demand Management	LNDR	NTA-C7-75	Alternatives to LNDR	<p>I welcome the removal of the LNDR from the draft plan. It's possible to travel from Coonagh to Castletroy at present in less than 20 mins via the N18 and M7. I would welcome upgrades to the existing M7 J28 to reduce congestion at the Mackey Roundabout in lieu of this road.</p>	<p>In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.</p>
Roads and Demand Management	LNDR	NTA-C7-45	Support for LNDR	<p>We, in Sinn Féin, contend that the failure to reference the Northern Distributor Road significantly undermines the usefulness of the plan in its totality. We note that the Northern Distributor Road was also not included in the National Development Plan.</p> <p>Currently, availing of public transport in the city can be arduous. Travelling from the northside of the city to the University of Limerick often takes in excess of one hour due to traffic congestion. Alleviating traffic congestion in the city will allow for a quicker public transport service between the locations near both the TUS campus and the University Of Limerick Campus.</p>	<p>In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.</p>

Roads and Demand Management	LNDR	NTA-C7-40	Support for LNDR	<p>In our Submission of October 2020, under the Roads & Streets (Section 10), we requested that the advancement of the Limerick Northern Distributor Road be considered. We would reiterate the need for this vital piece of infrastructure for the Limerick / Shannon area and would request that it be included as a deliverable in the final draft of the LSMATS.</p> <p>The connectivity this route would provide for the increasing numbers of Shannon-based businesses undertaking collaborative projects with the existing University of Limerick campus, for the increasing numbers of students travelling from Co. Clare to the university, and for connectivity at many other levels, is a paramount reason for its inclusion.</p>	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-74	Opposed to LNDR	<p>Our main objections to Phase 2 of the LNDR concern the ecological and environmental damage this project would cause at a time where given the climate crisis every possible effort should be made to reduce CO2 emissions and to realise the climate targets set nationally and internationally. The proposed road would be a retrograde step, in complete contradiction with the strategy as a whole and its welcome emphasis on improving public transport and developing the cycle network.</p> <p>Alleged economic advantages of building the LNDR remain unconvincing, not least because of the decrease in the use of the toll tunnel the proposed LNDR would inevitably cause.</p> <p>The LNDR Phase 2 would lead to a spread of urban fringe into the rural countryside, split the village of Parteen and generate more traffic, whereas areas within Limerick City boundaries could be redeveloped without any such negative impact.</p>	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-26	Phasing of LNDR	Following a reassessment of our position in light of the LNDR omission in Draft 2, the NTP Traffic Group, now request that junction improvements at the Mackey Roundabout and NTP approach be prioritised, pending full completion of the LNDR at a later stage. This should not be interpreted as accepting the LNDR is no longer needed. On the contrary, we believe a longer-term phased development of the full LNDR should be supported in LSMATS. However immediate improvement works at Junction 28 (Mackey Roundabout) should be prioritised and supported, pending the later phased development of the full LNDR scheme. This phased approach to the development of the LNDR is regarded by us, the NTP Traffic Group, as critical to the continued success the of the National Technology Park and indeed the wider Castletroy environs.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-66	Opposed to LNDR	We welcome the omission of the Northern Distributor Road from the strategy. As the modelling showed, the new road would lead to overall increase in driving. Even if these	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

				vehicles are electric, that still leaves the problem of congestion and pollution from brake and tyre dust.	
Roads and Demand Management	LNDR	NTA-C7-26	Corbally	A delayed phased construction of the LNDR has serious implications for traffic coming from the Corbally area to the city and NTP environs, as this approach currently experiences long queueing delays. The NTP Traffic Group recommends that this approach to the city be given priority for early treatment and the NTA should consider the viability of a strategically placed Park & Ride on the Corbally approach.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-68	Support for LNDR	<p>It is noted that it is now proposed to remove the Limerick Northern Distributor Road from the Draft LSMATS. This is wholly unacceptable to Clare County Council. The delivery of an orbital transport corridor is critical to the performance of the south-east Clare and Limerick-Shannon region as it is a key link between Shannon Airport, UL, the Clare TUS campus, the UL campus (of which 40% is in County Clare), and the South Clare/UL Economic Strategic Development Zone for which designation has been sought from the Minister for Housing, Local Government and Heritage.</p> <p>Clare County Council requires the LNDR to be reinstated into the LSMATS in order to give effect to the objectives and policies set out in the democratically adopted Regional Spatial and Economic Strategy for the Southern Region (RSES) and to give effect to the Development Plans of Clare and Limerick Local Authorities; thus enabling sustainable transport and socio-economic development for Limerick city centre, Limerick-Shannon Metropolitan Area and surrounding Co. Clare area</p> <p>It is incumbent upon the NTA to include the LNDR orbital transport corridor as a transport objective within the LSMATS.</p> <p>if the current draft is issued as a final strategy, the omission of the LNDR from the LSMATS, after its inclusion in democratically adopted planning, land-use and economic policy over the last 20 years – in particular in the recent RSES – represents a failure of integration of transport and strategic economic and land-use planning and will significantly dent investment confidence into the region, creating huge uncertainty around all proposed infrastructural plans and projects</p> <p>It is critical that the LNDR orbital transport corridor is retained and its absence from the current draft of LSMATS is a major oversight. The Limerick Northern Distributor Road is of immediate and urgent importance to stakeholders.</p>	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

				<p>From an economic perspective, there is a strong case for the delivery of the LNDR with a positive Benefit to Cost Ratio of 2.3 generated by the scheme. Additionally, although the scheme has a strong economic case, its benefits for the wider region in terms of improved socio-economic and accessibility benefits to key education, residential and employment areas and its key role in the overall LSMATS for the region are its biggest strengths which cannot be readily quantified under traditional Cost Benefit Analysis.</p> <p>Some of the worst traffic congestion in Limerick occurs on the northern side of the city where the road network is most restricted. Average traffic speeds on the Corbally Road range widely from 25 km/h at off-peak times to 10 km/h at peak. Journey times are more than double in peak periods as a result. This situation adversely affects the public transport service on Bus Route 301 from Westbury to the city. The TFi Journey Planner indicates that this bus journey currently takes 16 minutes at off-peak times, but can be 25 minutes long at peak times, a variation of over 50%, which can be seriously disruptive for reliability and scheduling, as well as being highly inefficient for the bus fleet</p> <p>The existing narrow radial routes in Limerick would need considerable widening and encroachment into properties for the provision of continuous bus lanes and segregated cycling facilities. To do this would be very disruptive for the city and the affected communities. For example, road widening is not feasible in the urban section of the Corbally corridor approaching the city centre without the demolition of extensive numbers of buildings. An alternative option would be to divert as much traffic as possible away from the central city zone by provision of a completed ring route to connect the radial roads on the northern side.</p> <p>Complementing this should be a full system of Park & Ride facilities on all approach routes including the R463 through Westbury and Corbally so that commuters from the wider hinterland can transfer to public transport at the edge of the city. In this context the modal shift away from car can be maximised and the volume of traffic in the city can be minimised.</p> <p>The Limerick Northern Distributor Road (LNDR) has the potential to divert traffic out of the city and to enable better priority for public transport.</p> <p>In Dublin and Cork and other metropolitan areas, ring roads have pulled traffic away from the city centre and enabled better provisions for public transport and cycling. Such an option does not exist on the northern side of Limerick City,</p>	
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				where traffic is forced unnecessarily through the central zone in the absence of an alternative route	
Roads and Demand Management	LNDR	NTA-C7-73	Opposed to LNDR	The LNDR is not consistent with our national climate targets and therefore should not be included in any future versions of LSMATS. As well as this the LNDR would increase car dependency which disadvantages lower income people as well as those who cannot drive for any number of reasons.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-20	In favour of the LNDR	The University is surprised and expresses significant concern at the exclusion of plans to construct the LNDR. The University believes that the achievement of the objectives of the whole strategy is put in doubt arising from this decision.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-6 NTA-C7-25	Opposed to LNDR	Our family are totally supportive of your decision to exclude the Limerick Northern Distributor from this Transport Strategy because of the damage the proposed Road would inevitably cause to the local landscape.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	LNDR	NTA-C7-56	Support for LNDR	The LNDR must be included in the final LSMA Transport Strategy. The RSES identifies the fast-track delivery of the LNDR as a strategic investment priority for the Limerick Shannon MASP. The LNDR is key to enabling the LSMA to achieve its growth potential and to ease traffic congestion. The decision to remove it from the revised draft LSMATS limits the role of public transport in facilitating the effective	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.

				transition to sustainable transport that forms the basis of the LSMATS.	
Roads and Demand Management	LNDR	NTA-C7-85	Opposed to LNDR	We welcome the removal of the Limerick Northern Distributor Road for many reasons, not least the increase in carbon emissions from induced demand and further bedding in car dependency, opening up greenfield development land and resulting in urban sprawl, outside the current settlements in the area.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	Lower Traffic Speeds	NTA-C7-10	Support measures which reduce traffic speed	If we put raised speed bumps on ALL side streets. Road users will quickly realize increased speeds are NOT acceptable in the city core anymore.	Noted. Additional traffic management measures included.
Roads and Demand Management	New Road Proposal	NTA-C7-65	Need for completion of road link	For information, we note that a key section of road infrastructure along the Childers Road/Groody Road future bus corridor route is incomplete at the northern boundary of the Towlerton lands linking with Bloodmill Road. We urge Limerick City & County Council and the National Transport Authority to ensure that this section of public road infrastructure is delivered without delay.	Noted. This is a matter for the implementation of BusConnects and the LCCC Development Plan. No change required.
Roads and Demand Management	New Road Proposal	NTA-C7-86	New thoroughfare into Limerick	In order to achieve this a new gateway could be provided for by building a distinctive new thoroughfare to enter the city from the south through the existing parkland. The new thoroughfare would continue to Hyde Road and terminate at Colbert Station where cars would be directed to the Colbert park and ride facility so that persons could easily change mode of transport to use new urban transport services such as tram, city shuttle bus, or suburban rail - reducing car usage in the city. Persons could also connect to the high-speed inter-city rail services.	Noted. It is not the intention of the NTA and LCCC to provide for additional road capacity into the centre of Limerick City. No change required.
Roads and Demand Management	New Road Proposal	NTA-C7-19	Rosbrien to Dooradoyle Road	We would respectfully request the finalised Limerick/Shannon Metropolitan Transport Strategy 2040 would consider further the provision of a local access route connecting the Rosbrien Road with the Dooradoyle Road through the potential new development zone. The design of this new street will be focussed on pedestrians and cyclists and would offer some filtered permeability by all modes providing better local connectivity between the Rosbrien area and the centre for services and employment the future shopping centre area could deliver. This Rosbrien link is included as a roads objective of the Limerick City & County Development Plan 2022-2028, and we would respectfully request that this road be added to Map of Proposed Road Network 2040 to be contained in the finalised LSMATS.	Noted. Road added in accordance with Development Plan.

Roads and Demand Management	PM1 - Parking Management	NTA-C7-73	On-street parking	There are too many on-street car parking spaces in Limerick city centre. These take an up an enormous amount of land as well as prevent improvements to our public realm such as wider footpaths, tree planting, public seating, cycle lanes etc. We should remove a significant number of these car spaces, particularly in the Georgian area of the city.	Noted. Covered under RS6. No change required.
Roads and Demand Management	PM1 - Parking Management	NTA-C7-50	Maximum parking standards	Consider the implications of maximum values in car parking standards particularly with regard to established higher order centres e.g. Local and District Centres, where there is increased customer footfall and vehicular demand.	Noted. Covered under RS6. It is the intention to manage the demand for car at all destinations in order to encourage sustainable travel. No change required.
Roads and Demand Management	PM1 - Parking Management	NTA-C7-50	Protect established retail	Ensure adequate car parking provision to facilitate customer journeys in line with preferences whilst protecting established retail destinations.	Noted. Covered under RS6. It is the intention to manage the demand for car at all destinations in order to encourage sustainable travel. No change required.
Roads and Demand Management	PM1 - Parking Management	NTA-C7-64	Suburban parking charges	Implement equivalent parking charges in suburban shopping areas	Noted. Covered under RS6. It is the intention to manage the demand for car at all destinations in order to encourage sustainable travel. No change required.
Roads and Demand Management	PM1 - Parking Management	NTA-C7-64	Public sector parking	Require government agencies to introduce parking charges and restrictions	Noted. Covered under RS6. It is the intention to manage the demand for car at all destinations in order to encourage sustainable travel. No change required.
Roads and Demand Management	PM1 - Parking Management	NTA-C7-66	Support for parking measures	Provisions for parking are very welcome.	Support for strategy measures is noted.
Roads and Demand Management	RS4 - National Roads	NTA-C7-33	Mackey roundabout	Introduce a slip road, between the Newport / Mackey Roundabout and the National Technology Park to alleviate dangerous traffic congestion as a matter of urgency. In conjunction with these other measures such as segregated cycle lanes to facilitate greater active and micro-mobility travel options should be included.	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Roads and Demand Management	RS4 - National Roads	NTA-C7-24 NTA-C7-26	M20 and Foynes Road	The development of improved Rail/Road connections to Dublin, Cork (incl. N/M20 scheme) and the new road link to Foynes Port.	Support for strategy measures is noted.
Roads and Demand Management	RS4 - National Roads	NTA-C7-64	M20/M7/M18 junction	A connection from M20 to Childers road is needed	Noted. The provision of accesses onto the National Road network is a matter for TII. The LSMATS provides for the protection of the capacity of the national road network in line with national policy and as such, does not provide for this access. No change required.
Roads and Demand Management	RS4 - National Roads	NTA-C7-16	Need for access from M7 and M20 to Carew Park	The reopening of the inbound access from the M20 Limerick Southern Ring Road to Carew Park Link Road is a specific opportunity for the severely disadvantaged community of Limerick City South and the likely economies of scale in factoring in a full and final solution in tandem with the N/M20 Motorway project build. Inclusion in the final LSMATS will provide the impetus for this opportunity to be finally realised.	Noted. The provision of accesses onto the National Road network is a matter for TII. The LSMATS provides for the protection of the capacity of the national road network in line with national policy and as such, does not provide for this access. No change required.
Roads and Demand Management	RS4 - National Roads	NTA-C7-39	Limerick to Cork	We recommend that a section of the draft plan be set aside for provisions to be put in place for the possibility of a new future national infrastructure projects connecting Limerick and Cork via a Motorway and a possible rail route. And that the current draft ensures that such projects will be incorporated into the overall strategy, and that they reflect the stated goals of the LSMATS.	Noted. The LSMATS provides for links from Limerick to Cork.

Roads and Demand Management	RS4 - National Roads	NTA-C7-56	Support for N19	The N19 approach to Shannon Airport, which is now a single carriageway, is a key focus area as it often causes extensive congestion in peak times. Ensuring this road is of appropriate standard and has optimal current and future capacity is critical to the effective functioning of the Mid-West region's economy	Noted. The N19 project is progressing as appropriate and is supported by the LSMATS. No change required.
Roads and Demand Management	RS4 - National Roads	NTA-C7-30	Upgrade of the M7	The NDP investment commitments do not include any improvement works to the M7 and associated national road junctions as outlined on the 'Proposed Road Network 2040' Map of the Revised Draft LSMATS and referenced in Section 14.3.1 of the text.	Noted. The LSMATS horizon year extends beyond the current NDP. No change required.
Roads and Demand Management	RS4 - National Roads	NTA-C7-30	Support for Mackey Roundabout / J28 improvements	TII are supporting Limerick City and County Council in improving connectivity in the vicinity of the Mackey Roundabout/Junction 28 M7.	Support for strategy measures is noted.
Roads and Demand Management	RS4 - National Roads	NTA-C7-30	Need for motorway order and use of S28 Guidelines	consideration will need to be given to the requirement for a Motorway Order for any modification, including additional connectivity, to a designated motorway. The Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) establish the land use planning policy context for new junctions and/or enhancements to existing junctions on national roads	Noted.

Roads and Demand Management	RS4 - National Roads	NTA-C7-46	Support for N/M20	<p>We note and welcome the commitments made in LSMATS to the delivery of the N/20 Cork to Limerick Project, a project which will be a critical enabler in the future development of the Limerick Shannon Metropolitan Area (LSMA), strengthening its role as an international location of scale and a primary driver of economic and population growth in the Southern Region.</p> <p>Measure CC1 of the strategy underlines the need to develop a comprehensive strategic cycling network. The N/M20 Cork to Limerick Scheme will function as an important component of this from an inter-regional and inter-urban perspective. The N/M20 Cork to Limerick transport solution being developed includes an Active Travel Strategy with the potential to deliver over 80 km of safe walking and cycling routes within a corridor with an urban population catchment of over 300,000 persons, benefiting resident and working communities, as well as visitors in the region.</p> <p>The N/M20 Cork to Limerick Project will complement the LSMATS park and ride strategy. The provision of a strategic park and ride facility at Raheen, as identified in LSMATS and supported by the N/M20 Transport Corridor, will be a critical piece of infrastructure for the LSMA, assisting with the transfer of commuting trips from private car to sustainable and active travel; maximising public transport patronage by increasing the effective catchment area for such services; Improving access for those living in regional towns and villages and in rural areas; and supporting economic vitality by improving overall accessibility to Limerick City Centre and other key destinations</p> <p>The N/M20 project has identified the potential to form 'Mobility Hubs' at strategic locations along the Cork to Limerick transport corridor to improve integration with different types of transport, including rail, bus, electric bikes and scooters, secure cycle parking and electric charge points to facilitate local trips, intermodal use and service the recreational tourism sector. We welcome the emphasis placed on such infrastructure in LSMATS, the future planning and provision of which is now imperative to futureproof capital investment and underpin the success of LSMATS. LSMATS highlights the importance of equitable access to transport infrastructure. The N/M20 Cork to Limerick Project will strongly support the NTA's Connecting Ireland programme which seeks to address gaps in connections to local and regional centres in rural parts of Ireland, and allow for improved access to local services, with more options for sustainable transport across the region</p>	Noted. The LSMATS provides for the N/M20 scheme, including rail and cycling elements. New text added into Rail section.
Roads and Demand Management	RS4 - National Roads	NTA-C7-56	Support for N/M20	The N/M20 project is a critical missing link from the Atlantic Economic Corridor, improving regional connectivity and accessibility along the western seaboard.	Noted. The LSMATS provides for the N/M20 scheme, including rail and cycling elements. New text added into Rail section.

4. Walking					
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-40	Shannon pedestrian network	<p>➤ the walkway/cycle way from Limerick to Bunratty could be extended to Shannon using existing riverside infrastructure – using existing green and landscaped areas, not roads; and</p> <p>➤ if the walkways in Shannon could be refocused on the existing black path network that already exists and is extensively linked to the town</p>	Noted. Changes made to the report.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-83	Support for better footpaths	As mentioned previously, with respect to Sarsfield Bridge, the needs of pedestrians must take highest priority in the allocation of road space. The Design Manual for Urban Roads and Streets mandatory guidance must be embraced. Primary pedestrian arteries 7 have medium to high footfall and DMURS requires footpaths be 3-4m wide in these situations. Despite this, many footpaths with medium to high footfall are currently approximately 1.8m in width and pedestrians usually have to step onto the roadway when passing other pedestrians. LSMATS should have a clear action to address this issue.	Noted. Covered under WK1. No change required.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-85	Lower traffic speeds	We would like to see an expansion of the Improvements to the Pedestrian Environment within Objective WK1 (Section 8.3), and specifically an increased ambition for lower traffic speeds	Noted. Additional text included.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-33	Pedestrianise O'Connell Street	Review plans for operation of O'Connell Street with a view to pedestrianising core blocks for an enhanced visitor and resident experience. Including significant greening to enhance a sense of well-being for visitors and provide a natural canopy when leaves are present.	O'Connell Street has been identified by the NTA and LCCC as the preferred option for delivering the maximum numbers of people to city centre workplaces and businesses. The routeing shown in the LSMATS is indicative and will be subject to the outcome of public consultation on a new Limerick bus network. No change required.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-39	Pedestrian safety and security	While we welcome the provision of integrated walking infrastructure for pedestrians, we recommend that all existing and future paths be designed with the security and safety of pedestrians in mind. A clear provision for public safety infrastructure would ensure that pedestrians have peace of mind and can enjoy the new amenities and routes outlined in the plan.	Support for strategy measures is noted. Change made to text to reflect safety and security.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-85	expansion of priority nodes in the delivery of a walking network	Regarding Section 8.4.3, we would like to see an expansion of priority nodes in the delivery of a walking network. In addition to schools, we would like to see public transport stations and stops, large workplaces, public amenities, sports clubs, hospitals and education campus identified as priority nodes on the network	Noted. Changes made to the report.

Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-39	Additional pedestrian routes	We recommend that the following roads be included under Section 8.3.2 concerning strategic walking routes: Childers Rd to City East Plaza via the Bloodmill Road. As new residential developments are being put in place, paths should be included along Bloodmill Road as currently there is no safe way to cross this road.	Noted. Strategy reviewed and changed.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-39	Paths between towns and villages	We welcome the provision of walking infrastructure for several key towns and villages that fall within the LSMA and recommend that all towns and villages within a reasonable distance of one another contain a designated footpath along the full length of the roads that connect them. This would improve safety on rural roads for residents, pedestrians, and visitors to these areas	Noted. Text added to WK3.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-10	Illegal Parking	Pedestrianisation does worry me because unless we solve the illegal parking with bollards or planters it will never be safe. Pedestrian zones will need to be managed much better	Noted. No change required.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-75	Support for walking investment	Lastly, I welcome further investment in the most simple but most important infrastructure; walking and cycling. Limerick is a largely flat and walkable/cycleable city and now more than ever we need to invest in making Limerick a safer place for both groups.	Support for strategy measures is noted.
Walking	WK1 - Improvements to the Pedestrian Environment	NTA-C7-27	Coordination of walking improvements	The Group suggests that the proposed walking infrastructure development be coordinated with related policies (e.g. Local Area Plan, Clare County Development Plan) and proposed improvement works including the N19 upgrade works, which will provide pedestrian linkage between Shannon Airport and Shannon Free Zone West.	Noted. The NTA works closely with the local authorities in the implementation of transport measures.
5. Urban Design and Placemaking					
Urban Design and Placemaking	Age Friendly Street	NTA-C7-10	Disabled and Age-Friendly Street on O'Callaghan Strand	If we remove parking on a Callaghan Strand and replace it with parking bays for disabled and elderly only. (OVER 65) That way it would create an entire street for disabled people and the elderly	Noted. This matter is most appropriately addressed in detail in the Limerick City Centre Traffic Management Study provided for under measure UD2.
Urban Design and Placemaking	Local Urban Design Suggestions	NTA-C7-10	Improve certain parts of the city	Barringtons Pier. Fix it up better than it is now... Henry St Entrance Since the flowers were taken away more people do use it but the place got a bit duller. There are plenty of car parks within walking distance so the car spaces can be replaced with trees down to the traffic lights including Garda spaces. Mill lane The footpaths need to be done here as they're in disrepair. Seating on the boardwalk for Steamboat Quay for residents and tourists. A spinning chair that goes round and round for the kids to play on. A swing for adults facing towards the road, not the river... Underground bin storage around the city to remove those	Noted. This matter is most appropriately addressed in detail in the Limerick City Centre Traffic Management Study provided for under measure UD2.

				<p>rat-infested bins down laneways and in plain view at bus stops.</p> <p>Many other suggestions made in this submission are beyond the remit of LSMATS</p>	
Urban Design and Placemaking	UD1 - Supporting Sustainable Mobility	NTA-C7-66	Roadspace Reallocation	Above all else, the focus should be on space reallocation rather than building new infrastructure, such as bridges and new roads, to accommodate sustainable transport modes.	Noted. The LSMATS provides for the level of roadspace reallocation and new infrastructure deemed necessary during project-level assessment. No change required.
Urban Design and Placemaking	UD1 - Supporting Sustainable Mobility	NTA-C7-85	Roadspace reallocation	Reallocation of road space away from private car traffic and surface car parking should be undertaken in order to prioritise walking and cycling. This should include the use of pedestrianisation zones, Low Traffic Neighbourhoods, filtered permeability, and contraflow lanes throughout the city and towns.	Noted. The LSMATS provides for the level of roadspace reallocation and new infrastructure deemed necessary during project-level assessment. No change required.
Urban Design and Placemaking	UD1 - Supporting Sustainable Mobility	NTA-C7-66	Roadspace reallocation	We would like to see a separate measure enshrined in the strategy that is addressing the need for road space reallocation, perhaps in a form of sequential auditing of roads in different areas in LSMA, particularly focusing on identifying overengineered roads. When road resurfacing and maintenance is done, every effort should be made to bring that road up to the standard that enables and promotes active travel (in line with existing manuals and policies).	UD1 specifically addresses roadspace reallocation. No change required.
Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-62	Annacotty Vilage	An entire village in the metropolitan area has zero cycling lanes and has on-street parking that is drive-in/reverse-out which is extremely dangerous. Pedestrian routes in the village are dangerous with only one crossing. There are routes that do not have footpaths.	Noted. Annacotty added into cycle network. Other issues covered under UD1 and RS6.
Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-18	Concern over traffic management measures	The main concern is that the draft strategy is too restrictive and focused primarily on the quasi-abolition of the private motor car in favour of public transport alternatives however given the over reliance of private transport solutions for the majority, through the lack of public infrastructure and access to the public transport system, the strategy should include a range of complementary long-term objectives for all all transport users of the city centre streets and the city environs in terms of their function, layout and physical quality.	The LSMATS does not set out to abolish the private car, merely to manage the network in order to facilitate and encourage a significant shift towards public transport, walking and cycling in accordance with Government policy and the NTA's prescribed functions. No change required.

Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-18	Review one-way system	a review of all of the one-way traffic system is required to ensure that the full potential to ameliorate current difficulties is harnessed in the context of the Southern Ring Road and any future Limerick Northern Distributor Road and the removal of most through traffic. For example it is preferable for as many streets as possible to have two-way traffic and there should be contra-flow cycle lanes on all one-way streets where these are retained as outlined in the Movement Framework Study undertaken by Arup on your behalf in 2015.	Noted. This will be covered in detail in the Limerick City Centre Traffic Management Study. No change required
Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-64	One way system	Consider converting one way streets to two way streets - sarsfied, henry streets etc.	Noted. This will be covered in detail in the Limerick City Centre Traffic Management Study. No change required
Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-18	Need for a city centre plan	What seems to be missing at present is a proper Master-Plan for the City Centre that addresses all the public realm and transportation issues in a coherent vision across all of the street network.	Noted. This will be covered in detail in the Limerick City Centre Traffic Management Study. No change required
Urban Design and Placemaking	UD2 - Traffic Management in Limerick City and Metropolitan Centres	NTA-C7-10	Local traffic management suggestions	Caherdavin - Put an LTN on the road for residents only or put ten speed bumps there. On either side to stop dangerous speeding.	Noted. This is a localised matter for the local authority to address. No change required.
6. Cycling					
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-24 NTA-C7-26	UL to NTP Greenway	Early advancement of the Greenway extending UL Greenway to the rear of the NTP and onwards to Annacotty.	Noted. It is the intention of the NTA and LCCC to deliver the cycle network in the early phases of the LSMATS implementation as set out in section 19.5.2.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-34	Raheen Roundabout	Analog have recently completed a travel survey to understand how our employees travel to work and we have seen increase in the number of people cycling and walking to work however these people have raised concerns over the Raheen roundabout where it is dangerous to cycle and walk and to get safe access to the estates footpaths.	Noted. The Raheen roundabout forms part of the cycle network plan and the BusConnects indicative priority network. Issues identified will be examined as part of the implementation of these schemes. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-68	National cycling strategy	It is likely in the context of the national cycling strategy that the Shannon to Limerick greenway will be connected to the Limerick to Scariff greenway including the University of Limerick without traversing the city centre. The optimum means of achieving this is the LNDR orbital transport corridor which will incorporate cycling infrastructure.	Noted. No change required outside of the consideration of the LNDR project.

Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-63	Convert rail line to Greenway	There is currently a disused trainline which includes a section from the Crescent Shopping Centre/Dooradoyle Road most of the way along areas of Raheen that see little use. By refurbishing this line as a cycleway the Council could open a whole new area for the community, while providing a signature, best in class piece of cycling infrastructure. This would create a huge incentive for people to cycle from Raheen/Mungret to the Crescent, and into town, in a way that will relieve huge pressure on a narrow road (Fr. Russell Road) which has little room for expansion. A small extension to the cycleway could allow it to connect to existing cycle lanes on the R510, which would great a cycling thoroughfare for commuters in Raheen and Mungret that would massively incentivise cycling for adults and children alike.	Noted. The LSMATS provides for the protection of the Mungret and Adare corridor for future use as a rail line. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-40	Shannon cycle route	➤ Could the cycle way in Shannon be extended to take in the riverside in Shannon and on to the airport?	Cycle links identified include connections along the estuary and into the Airport. No change required
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-51	Support for cycling	The emphasis on improvements to cycling infrastructure is a very positive step in the direction of decreasing car dependency, traffic congestion and greenhouse gas emissions. To fully entice residents to take up cycling as their preferred mode of transport within the city, it is imperative that cyclists feel safe.	Supportive comments noted. Covered under CC1 and other cycling measures.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-72	Support for cycle network	Hi, we would really like to get a joined up bicycles lanes for children to travel from one end of the city (outskirts) to the other and to enable our children to grow up healthy by walking, cycling more by feeling safe in doing so.	Noted. Covered under CC1.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-62	Annacotty cycle routes	In addition, Annacotty should be on the primary cycle route - this will facilitate trip chaining and multi-purpose trips, passing shops, schools, and businesses. The extension of the Greenway is concerning as this further promotes infrastructural development within a sensitive habitat - the lower Shannon Special Area of Conservation. What additional benefit arises from the extension of the path from UL to Annacotty that hasn't already been achieved by the cycle infrastructure through the technology park?	Noted. Annacotty added into cycle network.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-66	Remove proposed new bridge	We would respectfully recommend that the proposed new bridge from Clancy Strand to Arthur's Quay be removed as it does not link into either existing or proposed coherent and integrated cycling network.	Noted. Change made to report.

Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-28	Ped and Cycle audit of Limerick schools	Submission comprises and audit of the journey to school on foot and by bike for 6 primary schools in Limerick.	Noted. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-85	Cycle network	We would like to see the Cycling Network Measure CC1 within Section 9 to include a proposed network for Limerick City, Shannon and towns within the region with a significantly increased mesh width of 300 - 500 metres	Noted. Cycle networks are identified in LSMATS as appropriate.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-66	Early deliverable schemes	in terms of cycling there is a lot of low hanging fruit that can substantially contribute to the modal shift: improving permeability, contraflow lanes in the existing one way set up in Limerick City, Section 38 interventions on overengineered sections of roads, expansion of the Safe Routes to School scheme, reduction of on-street parking	Noted. It is the intention of the NTA and the local authorities to apply the most appropriate mechanism for the implementation of the cycle network in accordance with the legislation.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-78	Support for delivery of better cycle network	Please ensure that the quality of the bicycle infrastructure is of a much higher quality than we have seen lately. Please listen to the many vocal cycling advocates around Limerick asking for better delivery. Please ensure the design and materials used in these schemes are much more sympathetic to the area and are more sustainable and improve the sense of place rather than detracting from it.	Noted. The NTA and the local authorities are committed to implementing the cycle network in line with the emerging National Cycle Manual.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-39	Ardnacrusha and Parteen cycling	As these two areas are within cyclable distance to Limerick City Centre and Limerick City North around Westbury and Corbally, we recommend that the Primary route marked on the map found on page 57 be extended as far as Parteen and Ardnacrusha. Furthermore, we recommend that a feasibility study be carried out regarding possible extension of the secondary route North of the University of Limerick Campus and the current primary route south of Parteen.	The Primary routes are those which are forecast to cater for the highest numbers of cyclists. As such, secondary designations are most appropriate in these cases. Change made to network re: UL link dependent on LNDR.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-85	Opposed to new bridge	Although we welcome the reduction in private car traffic from Sarsfield Bridge (Section 9.1.5), we strongly oppose the proposal of a new pedestrian / cycling bridge over the Shannon (Measure CC2), given there are already adequate bridge crossings. With reallocation of road space to active and public transport, there is no need for additional bridges. A proposed bridge at Clancy Strand will detract significantly from the current riverside views of the landmark King John's Castle and the vista beyond.	Noted. There are 3 heavily constrained crossing points over the Shannon. The NTA and LCCC are of the view that an additional crossing may be of significantly greater benefit for pedestrians and cyclists than any further changes to the existing bridges. Text and map will be amended relocate bridge to O'Callaghan's Strand
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-60	Level of service	Recommendation Taking into account the growth of micro mobility and the budgets that have been committed up to 2030. We recommend that Primary routes should achieve a quality of service level A.	Noted. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-19	New cycle link over N18 to Dooradoyle	the ambition for the cycle network in the city & suburbs would be extended by the inclusion of a cycle/pedestrian bridge over the N18 to provide enhanced active transport connectivity between Dooradoyle and the city centre.	Noted. While the LSMATS envisages demand from Dooradoyle being accommodated on improved infrastructure on the existing road network, this option may be looked at with LCCC in line with any potential development proposals in this area. No change required.

Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-86	Support for cycling investment	The connection of Limerick Shannon to Greenways enabling nationwide travel is to be encouraged. Within the Limerick Shannon metropolitan area dedicated cycleways will encourage people to switch from car usage. It is submitted that where possible these could include elements to shelter cyclists from the elements – for example trees to reduce wind and it may also be appropriate to include overhead roofing and adequate drainage to protect cyclists from rain. Safety is another important element as people will be reluctant to use dedicated cycleways if they are concerned for their safety. The inclusion of CCTV and other forms of monitoring, as well as the development of patrols, will be important.	Noted. Many of these detailed design matters are covered under CC1. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-61 NTA-C7-60	Need for a high-capacity corridor to Dooradoyle	Develop as a matter of urgency a key worker corridor between the city and UHL to support workers that travel to UHL (and the Raheen Industrial Estate) on a daily basis and prioritise the development of other high-capacity corridors (University of Limerick; The Crescent Shopping Centre; residential areas in Dooradoyle, Castletroy, Ballinacurra and Monaleen; Technological University of the Shannon; Mary Immaculate College; Limerick School of Art and Design; and National Technology Park) within the next 2-3 years	Noted. It is the intention of the NTA and LCCC to deliver the cycle network in the early phases of the LSMATS implementation as set out in section 19.5.2.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-60	Remove cycle and ped bridge	No Cycling route on Clancy's strand for Pedestrian and Cycle bridge In sessions 9.1.4 Primary Cycle Network, It states; The NTA and Limerick City and County Council will also seek to provide a new pedestrian and cycle bridge across the River Shannon at a point along Clancy's Strand, However there is no cycling infrastructure planned for Clancy's Strand. This will need consideration.	Noted. There are 3 heavily constrained crossing points over the Shannon. The NTA and LCCC are of the view that an additional crossing may be of significantly greater benefit for pedestrians and cyclists than any further changes to the existing bridges. Text and map will be amended relocate bridge to O'Callaghan's Strand
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-31	Support for cycling generally	As a parent whose children regularly go to school by bicycle, I welcome the proposal for more cycle lanes to facilitate more school trips by bicycle and also make it easier for people to reach the park by bicycle. This should provide benefits in terms of reducing congestion and attendant noise and air pollution, increase physical activity and enjoyment of the locality.	Noted. The intention of the Measure CC1 is to provide for safe cycle infrastructure linking all major destinations in the LSMA. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-31	Submission on Fr Russell Road scheme	This submission is primarily a scheme level observation on the Father Russell Road Pt 8 road scheme.	Noted. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-10	Permeability	Even with the proper infrastructure, it will never be 100% for children to cycle around safely. Knocking down walls and opening up spaces in housing estates will take children off roads more often keeping them safer.	Noted. Covered under LU3. No change required.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-27	Coordinate Shannon Cycle Network development	The Group similarly suggests that this proposed cycle infrastructure should be coordinated with other policies (e.g. Local Area Plan, Clare County Development Plan) and proposed improvement works, including the N19 upgrade	Noted. The NTA works closely with the local authorities in the implementation of transport measures.

				works which will deliver a safer cycling infrastructure between Shannon Airport and Shannon Free Zone West.	
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-83	Cycle network proposals	<p>A notable omission from the draft LSMATS is a route around King's Island and a link across the northern section of the Abbey River and then, following the east bank of the Shannon River opposite Longpavement, to the northern end of the Mill Road.</p> <p>Another omission from the draft LSMATS which is apparent is the greenway link along the Erina Canal from the Black Bridge at University of Limerick to Clonlara (and on to O'Brien's Bridge, Killaloe and Scariff).</p> <p>There is also a pathway (along the alignment of an old railway line) from the Tail Race Bar in Parteen direct to the village of Ardnacrusha. This is on ESB lands but is accessible to the public. It is the most direct route from Ardnacrusha to the city and could be developed further to support increased numbers cycling</p> <p>Section 9.1.5 suggests that it is proposed to build a bridge for walking and cycling across the Shannon River to Clancy Strand. This is unnecessary given that LSMATS also intends to remove private vehicle traffic from nearby Sarsfield Bridge. A bridge here has not been mooted before and no justification for it has been presented</p> <p>Clancy Strand is identified as a primary route. However, a more appropriate primary route would be to link High Road and Ennis Road through Bellefield Gardens. T</p>	Noted. Changes made in consultation with LCCC.
Cycling	CC3 - Bicycle Sharing Schemes	NTA-C7-27	Extend bike sharing to Shannon	Shannon Group has facilitated an electric bike sharing scheme to serve Shannon Airport and Shannon Free Zone West. The LSMATS should consider the extension of this and other bike sharing schemes into Shannon Town.	Noted. Covered under CC3.
Cycling	CC3 - Bicycle Sharing Schemes	NTA-C7-27	E-scooter scheme for Shannon	Shannon Group suggests that any assessment undertaken for e-scooter schemes be extended to consider Shannon (Town, Airport and the Free Zones).	Noted. CC7 amended.
Cycling	CC3 - Bicycle Sharing Schemes	NTA-C7-39	Extend bike share to 3rd level	We recommend that in Measure CC3, that included under the plan for Bicycle Sharing Schemes, Third Level Institutions be considered as locations for future schemes. This would encourage students to use bikes for short journeys rather than public or private transport options.	Noted. CC3 amended.
Cycling	CC3 - Bicycle Sharing Schemes	NTA-C7-85	Expand bike share scheme	We welcome the expansion of bike share schemes (outlined in Measure CC3) and suggest that stations include all large workplaces including hospitals, universities and business parks, and that schemes include ebikes, ecargo bikes and non-standard cycles to increase accessibility for all.	Noted. CC3 amended.

Cycling	CC4 - Long-stay Cycle Parking	NTA-C7-73	Cycle parking in the city centre	There is a lack of secure bike parking in Limerick city. This is a serious impediment to cycling, I know several people who want to cycle from the suburbs into the city centre but won't do it because they fear that their bike will be stolen. LSMATS should include a plan for Limerick Council to provide safe, free, shelter bike parking within the city centre to help encourage cycling as a mode of transport.	Covered under CC4
Cycling	CC7 - Micro Mobility	NTA-C7-56	Support for Micro Mobility	Micro-mobility is a particularly convenient mode of transport. Plans to facilitate, promote and invest in supporting infrastructure for this mode of transport should be advanced in line with this strategy in order for the LSMA to be a leader in micro-mobility and be responsive to the likely high demand for this mode of transport once the required legislation is put in place.	Noted. No change required.
Cycling	E-Bikes	NTA-C7-14	E-Bikes	The cycling section does not cater for the likely impact of large numbers of electric bikes, probably scooters.	The LSMATS is based on a significantly higher mode share for cycling reflecting the potential role for E-Bikes. Text added to specifically refer to these.
Cycling	General comment	NTA-C7-60	Support for changes from previous draft	We are encouraged to see that many of our observations on the original submission have been adopted in the revised version. We welcome The improved representative modelling projections The inclusion of targets identified in section 20.2 The improved alignment with national policy documents The alignment of the strategy with the regeneration strategy	Noted.
Cycling	CC1 - Develop a Comprehensive Strategic Cycle Network	NTA-C7-51	Support for Cycling on Ped Streets	Further to this, it could be very positive to convert all pedestrianised streets in the city centre to shared spaces for cyclists and pedestrians. If cyclists were knowingly and openly welcome on these streets, I believe a stronger cycling culture could be created.	Noted. The LSMATS includes for such measures based on local conditions and on detailed design criteria. In developing such schemes, the safety and comfort of all users must be considered.
7. Implementation					
Implementation	Consultation at Delivery	NTA-C7-64	Consult further with City Centre business	Consult with city centre stakeholders at delivery	Lower-level plans and schemes will include public consultation. No change required.
Implementation	Consultation at Delivery	NTA-C7-61	Further engagement	LSMATS should contain an accessibility strategy and means for further stakeholder engagement. This is vital in the regeneration areas.	Lower-level plans and schemes will include public consultation. No change required.
Implementation	Consultation at Delivery	NTA-C7-42	Pre-design consultation	Public consultation for active travel projects is currently carried out after detailed plans have been drawn up. This is likely due to the absence of dedicated specialist consultation personnel. Please add the following to LSMATS - creation of dedicated consultation roles within the delivery teams (Roads / Active Travel etc) - scheduling of initial public consultation prior to drawing up detailed planning documents.	Noted. This is a matter most appropriately addressed at the level of individual projects. No change required.
Implementation	Delivery Metrics	NTA-C7-83	Cycling targets	Yet, despite such clear and positive language the targetted cycling mode share is just 10-15%. There is no doubt that this can reasonably be doubled at least, or tripled	The targets for cycling mode share are ambitious but are not a limit, and the infrastructure the NTA will seek to deliver will facilitate a significantly higher mode share. No change required.

Implementation	Delivery Metrics	NTA-C7-66	Targets for walking measures	targets for projects would be welcome, in particular under the scope of the Safe Routes to Schools Programme, where delivery targets could be quite easily set and progress easily measured.	The NTA are satisfied that the mode share targets are set at an appropriate level and in appropriate detail. No change required.
Implementation	Delivery Metrics	NTA-C7-66	Targets for Cycling	It is imperative that the commitment in LSMATS to build a safe, segregated cycle network for the city where children will not be mixing with heavy traffic, is delivered. The lack of targets in terms of kilometres of cycling infrastructure delivered and kilometres cycled should be addressed and targets included.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Delivery Metrics	NTA-C7-42 NTA-C7-45 NTA-C7-57 NTA-C7-53 NTA-C7-60	Set out targets and metrics	Identify multiple performance indicator metrics with clear fixed indicator points that align with achieving the 2040 targets and measures set out in the current draft of the document. All identified measures in the strategy should have an accompanying delivery metric with fixed interval milestones for the duration of the project Mandate the publication of a clear implementation plan to align with milestones throughout the lifetime of the strategy	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Delivery Metrics	NTA-C7-54	Need for targets	I believe that LSMATS is a good plan which I would love to see implemented. However it is essential that the targets set in LSMATS are measurable (ie. by counting the increase in children walking and cycling to school) by setting incremental targets.	Noted. Monitoring is covered in section 19.1 and will be a matter for the local authorities as well as the NTA.
Implementation	Delivery Metrics	NTA-C7-61 NTA-C7-60	Metrics on accessibility and inclusivity	There are no metrics to measure how accessible or inclusive the transport system becomes. This is key in the context that LSMATS recognises that regen areas within the metro area are 'severed' from the city centre impacting on employment and education opportunities. 50% of people that live in these areas do not own a car and yet as LSMATS sets out 'these spaces are predominantly designed for maximum speed'. How / when will this change and what engagement will take place?	On-going monitoring of the impacts of the LSMATS at the local level is a matter for the local authorities and the NTA will input as required. The NTA intends to deliver the funding required for active travel in accordance with our objectives in the LSMATS and the public transport services determined by the lower-level plans, such as BusConnects. Engagement will take place at the earliest stages in these plans.
Implementation	Delivery Metrics	NTA-C7-60	Targets	We would like to see the following targets added to support the measures in this section: The delivery of all primary cycle network routes in the first 18 months following final publication of LSMATS. The delivery of all secondary cycle network routes and completion of all junction and roundabout works in the first 3 years following final publication of LSMATS. Annual surveys of all schools in the Limerick Metro Area examining changes in modal share, including the installation of air quality monitors near schools and sports grounds, and reductions in car traffic as key metrics.	It is extremely unrealistic to expect all primary cycle routes to be delivered in 18 months. Other matters raised are a matter for the local authority. No change required.
Implementation	Delivery Metrics	NTA-C7-53	Suggested targets	Motor traffic speed reductions at key sites (city centre, suburb, county towns included in the plan area). LSMATS modelling includes reviewing the traffic light signals in the city centre to favour pedestrian phases and thereby slow traffic. Implementation of this would be a useful indicator. • Reduction of 50% of recorded pedestrian & cycling injuries and fatalities by 2030 to align with RSA strategy.	The NTA are satisfied that the mode share targets are set at an appropriate level and in appropriate detail. Road safety targets are a matter for the RSA. The reduction in parking will depend on the requirements for roadspace reallocation and on the outcomes of the city centre study - charges are a matter for LCCC. The manner in which the implementation and phasing of LSMATS is presented

				<ul style="list-style-type: none"> • Significant increase in numbers of children walking and cycling to school • Specific target for increase of bike share scheme users within cycling modal share • Reduction of 25% of on-street car parking spaces in the city. Current modelling has a 50% reduction of free workplace parking and a tripling of on street parking charges. • Increase of continuous pathways implemented within 5-year increments • Progress towards implementation of bicycle network in 5-year increments. 	<p>is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.</p> <p>No change required.</p>
Implementation	Delivery Metrics	NTA-C7-85	carbon reductions targets	The LSMATS should clearly outline a carbon emissions reduction target of, at a minimum, the carbon budget sectoral emissions target for the transport sector (yet to be announced, but within the range of 45 - 55%) by end 2025, and will need align with subsequent sectoral carbon budgets for the period 2026 - 2030 and for the period 2031 - 2035. It is worth noting that any overshoot of initial budgets will be required to be clawed back in subsequent budgets, making the task ever more difficult	The LSMATS has assessed its contribution towards the current stated emissions reduction target for the transport sector of 50%. Other elements of the transport system outside the remit of the LSMATS, including further demand management measures and changes to fuel, will also be required to contribute. This is all set out in Chapter 17. No change required.
Implementation	Delivery Metrics	NTA-C7-73	Targets for Cycling	We also need a modal share target for cycling that is measured at regular intervals, for example, 10% modal share for cycling by 2025, 15% by 2028 etc. The lack of time bound targets may cause delays and lock in greenhouse gas emissions caused by private cars for many years to come. Specifically we should have time bound targets for active travel to schools and have safe routes to school rolled out for all schools in the region in the over the next 1-2 years. The region also has many industrial estates which are often poorly served by cycling infrastructure. As these areas have a high density of commuting workers, we should have targets for increasing modal share of active travel to these areas.	The NTA are satisfied that the mode share targets are set at an appropriate level and in appropriate detail. No change required.
Implementation	Delivery Metrics	NTA-C7-60	Metric for car parking reduction	Objective 7 To minimise the impact of motorised traffic in urban centres. There will be a gradual transfer of kerbside space and other areas currently dominated by cars for use by pedestrians and cyclists. What is the metric to measure the success of this measure? We recommend the inclusion of a metric and target of a 60% reduction of street car park spaces based on the base level of 2022 figures of available spaces.	Noted - The reduction in parking will depend on the requirements for roadspace reallocation and on the outcomes of the city centre study
Implementation	Delivery Metrics	NTA-C7-85	Vehicle km reduction target	Given the level of ambition required to achieve this, we recommend a 20% reduction in car kilometres driven. The current Climate Action Plan (2021), to 1 be revised annually, outlines a target of 10% reduction of remaining 1 ICE trips, as does the National Sustainable Mobility Policy which also indicates a target of a 10% reduction in ICE trips by 2030.	The NTA are satisfied that the reduction in car mode share that LSMATS is forecast to deliver (70.4% to 46.1%) is consistent with Government policy.

Implementation	Delivery Metrics	NTA-C7-59	KPIs	Clear Key Performance Indicators are needed to measure the performance of the transport strategy as it is implemented. I would suggest the following as possible KPI'S: Percentage of work trips made by private car, public transport, bike and walking Percentage of trips to school made by private car, public transport, bike and walking Number of road fatalities Percentage of people feeling safe using public transport/active travel Gender breakdown of people cycling	Road safety targets are a matter for the RSA. The NTA are satisfied that the mode share targets are set at an appropriate level and in appropriate detail. The NTA undertakes public transport customer surveys regularly and the gender breakdown of people cycling is measured by the Census. No change required.
Implementation	Delivery Metrics	NTA-C7-85	Cycling target	we are requesting an increase in the strategic target from 15 - 20% (as outlined in 20.2) to a 40% modal share for cycling for Limerick City and Suburbs by 2040.	The targets for cycling mode share are ambitious but are not a limit, and the infrastructure the NTA will seek to deliver will facilitate a significantly higher mode share. No change required.
Implementation	Delivery Metrics	NTA-C7-61	Targets and monitoring	LSMATS must contain stepped targets and an effective monitoring regime including a range of indicators that tell us what's happening on the ground and the pace at which it's being delivered.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Monitoring	NTA-C7-39	Air pollution monitoring	We recommend that more air pollution stations be placed across the LSMA to monitor the area's air quality and to monitor the effect of traffic from commuters and traffic associated with businesses operating within the area. This would allow our Local Authorities and central Government to implement mitigation measures to curb excess pollution.	This is a matter for the local authorities. No change required.
Implementation	Monitoring	NTA-C7-56	Monitoring and review	The success of the LSMATS will depend on its delivery. The Transport Strategy must include appropriate monitoring and review mechanisms to ensure the continued development of the region's transport network. The Mid-West REC welcomes that LSMATS is a 'live' document, intended to be scalable, flexible and future-proofed enough to meet changes in population and employment growth. The implementation of the Transport Strategy must be informed by ongoing consideration of contextual issues and timely data.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Monitoring	NTA-C7-54	Need for monitoring	I ask that this plan is implemented and has an effective monitoring regime to enable the people of Limerick to travel in a safe and sustainable manner.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required. Noted. Monitoring is covered in section 19.1 and will be a matter for the local authorities as well as the NTA.
Implementation	Monitoring	NTA-C7-69	review period	With this in mind, our professional advice is that 6 yearly review periods are insufficient to steer a project of this magnitude and scope. This will result in only 2 reviews (in 2028 and 2034) before the strategy period ends in 2040.	The 6 year period is deemed appropriate as it aligns with the review period for the Development Plans and the RSES / MASP. Time is also required to deliver strategies. No change required.

Implementation	Monitoring	NTA-C7-59	zero ped and cycle deaths	I would also like to see an explicit goal within LSMAT's that Limerick would aspire to a goal of zero pedestrian and cyclist deaths given that the Irish Government have already committed to Vision Zero as part of their road safety strategy. Cities such as Helsinki and Oslo have achieved this through increasing parking charges, tolling, reducing speeds to 30kph and banning cars outside schools.	Road safety targets are a matter for the RSA.
Implementation	Responsibility for Delivery	NTA-C7-23	Responsibility and accountability	There should also be a very clear statement of who is responsible and accountable for the delivery of the outcomes.	Noted. Change made to report.
Implementation	Responsibility for Delivery	NTA-C7-54	Accountability	It is also important that someone is held accountable for progress or lack thereof.	Noted. Change made to report.
Implementation	Responsibility for Delivery	NTA-C7-42 NTA-C7-57 NTA-C7-53 NTA-C7-60	Define who is responsible	Define methods and the office or team responsible for independent monitoring and reporting on targets. Identify the office or Individual office holder responsible for the delivery of identified targets	Noted. Change made to report.
Implementation	Responsibility for Delivery	NTA-C7-69	Nature of governance structure	Build in a governance structure that incorporates the required agility and flexibility implementation approach to adapt in response to a challenging and rapidly evolving mobility sector.	The governance of LSMATS is a matter for primary legislation related to the functions of local authorities, the NTA, TII and Irish Rail. No change required.
Implementation	Timelines	NTA-C7-56	Timelines for BusConnects	Clearly defined timelines for the delivery of all elements of the BusConnects programme will be critical to give confidence to people and ensure LSMA has the capacity to manage growth and meet existing and future city transport needs	Noted. This is a project level matter. No change required.
Implementation	Timelines	NTA-C7-21	Targets for school active travel infrastructure	Targets for completion of primary school and secondary school active travel routes and traffic free school zones should be included in the strategy	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-85	Delivery of rail	Priority should be given to the project planning, design and delivery of rail infrastructure within the implementation timeline, with all elements to commence in the immediate phase, particularly since a number of project elements of the proposed rail plan have already commenced by Irish Rail, e.g. dual tracking Colbert Station to Limerick Junction, reopening the Foynes Rail Line, and the delivery target from Irish Rail for the station at Moyross is 2025.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-15	include timelines for delivery	In addition to these measures Cook requests that clear timelines are assigned to this project so that we have clear visibility on when we can expect a resolution to this significant access issue.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-23	Targets for delivery	it needs measurable targets, and shorter term milestones to assess performance.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local

					authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-72	Timelines for delivery	Can we get concrete timelines for when this strategy will be implemented please?	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-40	Timeline for Shannon Rail	. We would hope that the timelines presented in this Revised Strategy can be revisited enabling the delivery of a Limerick / Shannon / Sixmilebridge / Galway rail link in a much shorter timeframe.	The analysis undertaken by the NTA demonstrated that the numbers of passengers that would use the Shannon rail line up to 2040 could be accommodated by increasing bus frequencies. No change required.
Implementation	Timelines	NTA-C7-70	Lack of implementation plan	Furthermore I am concerned that the lack of specific implementation plans and oversight will result in an implementation gap as experienced with previous transport strategies notably Smarter travel (2009-2020).	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-55	Delivery of Phase 2 Rail Network	Iarnród Éireann believe that the timelines for Phase 2, including the construction of the projects proposed, should be reconsidered in the context of the opportunity that exists for rail to have a more fundamental role earlier in the Strategy to assist in achieving the state's aim to halve emissions by 2030, which is fast approaching, and to achieve net zero emissions by 2050. A significant opportunity will be lost if these interventions are not planned and constructed until post 2030	The analysis undertaken by the NTA did not identify significant mode share changes arising out of the Phase 2 rail network and as such, in order to contribute most effectively to emissions reduction targets, the short term focus of the LSMATS is on improving bus services that link people to their destinations more directly than rail would, and on delivering cycle infrastructure that will do similar. Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required. No change required.
Implementation	Timelines	NTA-C7-86	Bring forward rail developmemnt	As submitted above, it is imperative that passenger rail links are developed along the proposed rail routes in advance of population movements. Therefore the Limerick commuter rail network and passenger services for Munget, Parkway, Raheen, Patrickswell and Adare should be brought forward. It is imperative also that the Shannon airport link is developed.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.

Implementation	Timelines	NTA-C7-82	Timelines for delivery	<p>What's completely necessary - and yet completely missing - from the draft strategy is any formal plan for an implementation structure and performance indicator timelines, as well as regular progress reviews. The strategy is good and would be great if implemented entirely by 2040, or even sooner. I realise that a number of people and organisations have made submissions seeking additions to or modifications to the draft plan. I would just like to see it implemented in the stated timescale - by 2040.</p> <p>The OECD has previously highlighted the "lack of targets and an effective implementation structure" as the primary reason for the lack of success in executing the Smarter Travel Transport Policy. This isn't just some random person telling you that not including interim targets and reviews is and has been a mistake - it's the 38-member-state Organisation for Economic Co-operation and Development. I can't avoid pontificating on this, my sole point, so I'll just conclude by saying that it would be wise - no, not just wise - imperative to heed them. The alternative is failure. Limerick, Shannon, and humanity find ourselves at a pivotal point for efficient and environmentally-sustainable transport. We can't afford you failing with this. We can't afford you not to include formal implementation structures and performance indicator reports & timelines as part of LSMATS. You have a good plan. You need to take all possible steps to formalise its successful and prompt implementation.</p>	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
Implementation	Timelines	NTA-C7-56	Accelerate delivery	<p>Accelerated delivery of key transport infrastructure projects must be a central plank of the LSMATS. The success of the Strategy will depend on its delivery at a pace that meets the needs of the LSMA.</p> <p>For the LSMATS to realise a meaningful improvement in quality of life, it must demonstrate an ambition to reduce capital project delivery timelines. Progress necessitates the urgent removal of barriers to delivery. The delivery of projects essential to LSMA must not be unnecessarily held back due to public procurement procedural issues or problems within the planning system.</p> <p>Improving delivery of projects will require consideration of the risks. Public procurement and planning issues are areas requiring specific attention. Red tape not only adds costs to projects, but it can also undermine the viability of a project. Sufficient focus needs to be placed on this area to mitigate project risks, support competitive tendering, and to support faster project delivery.</p> <p>At a time of soaring construction costs, strategic infrastructure projects do not need to be burdened with additional costs and delays due to all too frequent objections that we currently see due to our broken planning system. All efforts should be made by local authorities to call on central government to make the required changes to</p>	<p>Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.</p> <p>Many of the issues related to the delivery of LSMATS relate to things beyond the remit of the transport strategy and of the NTA, including matters that can only be dealt with via primary legislation.</p> <p>No change required.</p>

				procurement and planning processes that will allow for radically improved project delivery timelines.	
Implementation	Timelines	NTA-C7-55	Phasing of rail investment	<p>Iarnród Éireann recommends that the final LSMATS should include a requirement to undertake an immediate feasibility study to map timelines and phasing of the priorities for rail identified above, including potentially a cost profile, during the first year of the Strategy.</p> <p>Iarnród Éireann believe it is critical that the studies for Phase 2 need to be moved to the start of the Strategy as an immediate priority, with a Shannon Rail Link feasibility and route option selection study a key part of that, and its construction prioritised prior to 2030. Given the reintroduction of the Foynes Line by 2027, subject to funding, Iarnród Éireann believe that the Strategy should also include a target to introduce passenger services to Adare on that line, and the Mungret line, by 2027, and that this is achievable</p>	<p>The analysis undertaken by the NTA did not identify significant mode share changes arising out of the Phase 2 rail network and as such, in order to contribute most effectively to emissions reduction targets, the short term focus of the LSMATS is on improving bus services that link people to their destinations more directly than rail would, and on delivering cycle infrastructure that will do similar.</p> <p>Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.</p> <p>No change required.</p>
Implementation	Timelines	NTA-C7-83	Timelines for Rail	Whether Phase 1 or Phase 2, it is important that the draft is more prescriptive around the timelines for initiating, planning and delivery of these. Phase 2 planning, particularly with regard to maximising Transit Oriented Development, should begin immediately. Given the benefit of the Limerick Commuter Rail Network to the LSMA it (both Phase 1 and Phase 2) should be a high priority for delivery. Much of it is deliverable by the mid-2020's (and needs to be given the urgency of reducing emissions and providing housing). Given the importance of the rail link to Shannon to the economic growth of the LSMA, it should be delivered as soon as possible, and certainly within this decade	<p>The analysis undertaken by the NTA did not identify significant mode share changes arising out of the Phase 2 rail network and as such, in order to contribute most effectively to emissions reduction targets, the short term focus of the LSMATS is on improving bus services that link people to their destinations more directly than rail would, and on delivering cycle infrastructure that will do similar.</p> <p>Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.</p> <p>No change required.</p>
Implementation	Timelines	NTA-C7-73	Timelines for implementation	I am requesting that LSMATS commits to rapid implementation of the 2015 Limerick Metropolitan Cycle Network Study. The delays implementing this are unacceptable.	Noted. The manner in which the implementation and phasing of LSMATS is presented is appropriate given the uncertainty in the design; planning; public consultation; decision-making; tendering and construction processes associated with each individual scheme. Every year the NTA and local authority publish their intended implementation programme in detail. No change required.
8. Supporting Measures and Integration					
Supporting Measures and Integration	Broadband	NTA-C7-24 NTA-C7-26	LSMATS should support better broadband	Request for LSMATS to support acceleration of improved broadband facilities nationwide to deliver on a permanent reduction to commuter traffic by facilitating working from home.	Broadband provision is beyond the remit of the LSMATS. No change required.

Supporting Measures and Integration	Energy Conservation	NTA-C7-61	Energy conservation needs to be included	Energy conservation must be included in a meaningful way in LSMATS as private car-based transport that is so prevalent in the city, is hugely wasteful of energy due to lack of a public transport alternative that is attractive and economic. Why drive if you can readily take a train/bus at a nearby station or bus stop and Limerick is very well structured in terms of potential rail networks. Pollution and emissions are one aspect but the conservation angle should be significantly highlighted as an ambition over the lifetime of the strategy. We need to have at least 50% commuters using public transport or alternative modes to the private car.	Noted. The remit of the LSMATS is broad in relation to how it will achieve a significantly higher sustainable mode share. Energy conservation policies have been transposed down through the various sectors including transport and the LSMATS responds to Government transport policy in this regard by promoting walking, cycling and public transport, facilitating electric vehicles and outlining the requirement for the freight sector. Additionally, the LSMATS is framed around reducing the need to travel via land use planning. It would be inappropriate to further link the LSMATS up through the policy hierarchy beyond that transposed via national transport policy to include energy conservation as an explicit objective as it is outside the remit of the NTA.
Supporting Measures and Integration	Enforcement	NTA-C7-61	Need for enforcement	Enforcement of traffic calming measures and illegal parking is a key aspect of transforming the strangle-hold that car traffic has on the metro area in terms of accessibility, safety, encouraging behaviour change, public health and reducing injuries yet this is mostly ignored in the plan	Noted. Text and measure added.
Supporting Measures and Integration	Integrated Transport Network	NTA-C7-39	Integrated Transportation Network	We recommend the finalised LSMATS includes urban and suburban transport routes with integrated schedules covering areas of high density of employment; Industrial Centres, Third Level Institutions, Technology parks etc. This way, commuters can transition from one form of transport to another seamlessly. Factoring this into timetabling would incentivise more commuters to opt for public transport over private transport options.	Noted. The LSMATS is intended to deliver a fully integrated transport network. No change required.
Supporting Measures and Integration	Resilience	NTA-C7-69	Resilience	Build in adaptive capacity and resilience in the event of either the electrification of the fleet being unachievable or biofuels not offering the degree of carbon reductions assumed.	Noted. It is not totally clear from this submission what is being proposed here. If those measures do not work out, there will have to be additional restriction on ICE vehicles - this will be a matter for Government. No change required.
Supporting Measures and Integration	Shannon Airport	NTA-C7-61	More needed on Shannon airport	There is very little in LSMATS on connectivity to Shannon Airport - should this not be a major part of this strategy especially given the issues in Dublin airport in recent weeks?	Specific reference to Shannon Airport is covered under inter alia, BC3, BC8, BC9, RL3 and RS4. No change required.
Supporting Measures and Integration	Shannon Airport	NTA-C7-39	Shannon Airport Development	The recent issues at Dublin Airport have highlighted the need for more balanced regional development when it comes to International Transportation Infrastructure. Shannon Airport offers an excellent option for the rerouting of existing routes and the creation of new ones to international destinations. This would reduce pressure on Dublin Airport while also giving travellers in the region a more local option.	Aviation policy is beyond the remit of the LSMATS. No change required.
Supporting Measures and Integration	SM1 - Local Transport Plans	NTA-C7-56	Coordination of plans	Development of active travel infrastructure should be coordinated as part of relevant plans e.g., Local Area Plans, Local Transport Plans or Masterplans.	Noted. The NTA works closely with the local authorities in the implementation of transport measures.
Supporting Measures and Integration	SM10 - Interchange	NTA-C7-56	Quality of interchanges and stations	LSMATS should prioritise appropriate transport user infrastructure when considering service end users practicalities such as safety, proximity to bus terminals, taxi ranks, pedestrian pathways, wheelchair ramps, street lighting, and cycle lanes.	Noted. These issues are addressed at the project-level. No change required.

Supporting Measures and Integration	SM10 - Interchange	NTA-C7-86	Colbert Station	<p>It is submitted that Colbert station should be developed as transport hub for the Limerick Shannon metropolitan region and as a central point in the Galway-Limerick/Shannon-Cork urban centres, in particular by:</p> <ul style="list-style-type: none"> -including a public transport interchange plaza with tram and city bus stops outside the station -Developing Colbert station as a park and ride centre where all traffic entering the city can terminate and park and then connect with public transport options. Colbert Station should be developed as a major regional inter-nodal transport interchange hub with an underground car park capable of accommodating all vehicles entering the city -• Ensure that sufficient space is provided to enable the widening of the rail corridor to a minimum of four tracks from Colbert Station to Ballysimon, with a potential future requirement to extend this to Limerick Junction -Enabling Colbert Station to expand for future higher-speed rail services by allocating space to build additional platforms at the location of the existing bus depot to the west of the station -Enabling future inter-city higher-speed rail services, and future regional rail services, to rapidly exit Colbert Station and proceed onwards by leaving sufficient space to develop new future rail lines to exit the station and proceed west of the city across a future new rail bridge connecting to Shannon airport and Ennis/Galway 	Noted. Irish Rail and Bus Éireann, with the support of the NTA have developed a scheme for the redevelopment of the Colbert station interchange and environs. No change required.
Supporting Measures and Integration	SM10 - Interchange	NTA-C7-78	Integration between bus and rail	<p>The Bus and Rail networks are not talking to each other. The core bus lines are proposed to run at 10minute intervals during peak hours, Yet the rail lines are running every 20-30 minutes. The two services provide the same function (moving people around the city). It makes no sense to have the highest capacity, most reliable, fastest public tranport service in the city running a below-par operation while the bus service will be stretched. The two services should be complimenting one another not competing. The Rail services should have a minimum peak service of 6 trains per hour to match with the bus services.</p>	<p>Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS.</p> <p>The NTA intend to deliver a bus network in the short-term that will cater for the majority of the public transport demand in the LSMA and which will be directed at population centres and centres of activity in order to encourage a significant shift away from the private car. It is not the intention of the NTA for people within the city and suburbs or elsewhere to require interchange between bus and rail other than those arriving at Colbert on inter-city and regional routes.</p> <p>It would therefore not be prudent to increase train frequency to match buses because the analysis undertaken throughout the development of the LSMATS, and published for review, shows that it would be very challenging for the potential rail network to carry sufficient numbers of people to justify investment. Increasing the frequency to match the buses would be even more challenging from a viability point of view.</p> <p>No change required.</p>

Supporting Measures and Integration	SM13 - Public Transport Fares	NTA-C7-84	Smart ticketing and RTPi	The NTCRP would like to note that objective RL7 is to be delivered successfully, a programme to introduce real time information needs to be provided at all stations. Currently there is no real time information available as all stations are notionally unmanned. It should be noted that all stations on the Limerick to Galway line which are unmanned/manned have real time information. Secondly, in the absence of smart ticketing, ticket vending machines need to be provided at all stations between Limerick and Ballybrophy. Online purchase of tickets currently requires users to go to a ticket vending machine to collect tickets. They are only found at Limerick Colbert or Ballybrophy station. Train crews do not issue tickets.	Noted. As Ballybrophy is outside the LSMA, the level of information contained in the LSMATS related to this line is appropriate. No change required.
Supporting Measures and Integration	SM13 - Public Transport Fares	NTA-C7-39	Hybrid Tax saver	We recommend that a provision be added to the current draft for a revision of the Commuter Tax Saver ticket to accommodate the new hybrid work model to which many workers have transitioned in the last two years. Such a revision could look at a regional version of the ticket that could incentivise more travel locally across all forms of transport.	Noted. This is outside the remit of the LSMATS. No change required.
Supporting Measures and Integration	SM13 - Public Transport Fares	NTA-C7-27	Criteria for Tax saver Ticket	The Group suggests that a review of qualifying criteria for the tax saver ticket scheme is also undertaken. Post-pandemic hybrid working models have led to a reduced number of commuting days per week for some employees. Tax saver tickets currently apply to daily commuting arrangements. As this tax saver scheme which brings value to public transport, inclusion of hybrid workers should be considered. This approach will help to enhance the attractiveness of public transport as an alternative to car use.	Noted. This is outside the remit of the LSMATS. No change required.
Supporting Measures and Integration	SM14 - Equity in Transport	NTA-C7-56	Consider all users	Any transport infrastructure development should also consider users on a broad range of the disability spectrum, e.g., visual impairment, hearing loss.	Noted. Covered in Section 16.10 and associated measures.
Supporting Measures and Integration	SM14 - Equity in Transport	NTA-C7-85	Accessibility	We would like to see the adoption of the National Disability Authority's 'Building for Everyone' on the External Environment Guidelines as part of adherence to Universal Design principles, as outlined in Section 8.4.1 and for Section 8.4.2, and in particular, that their recommendations on the provision of public seating at regular intervals throughout the urban areas. In the cycling network, we request that the design facilitate inclusion of non-standard cycles, including hand cycles, trikes, disabled bike parking.	Noted. Covered in Section 16.10 and associated measures.
Supporting Measures and Integration	SM2 - Strategic Park and Rides	NTA-C7-56	Support for P&R	Integration of the Park & Ride facilities with planned capacity upgrades or services enhancements and enabling infrastructure such as bus priority measures and vital ancillary services must be in place to enable the success of Park and Ride. In addition, there must be flexibility in the Transport Strategy to introduce additional Park and Ride facilities where demand exists. Park and Ride sites are particularly important to reduce congestion near	Noted. Covered under Section 16.2 and Measure SM2

				the Higher Education Institutions as numbers of students commuting grows.	
Supporting Measures and Integration	SM2 - Strategic Park and Rides	NTA-C7-34	Links from P&R t Raheen	Also park and ride facilities and bus services directly feeding around the industrial estates on a 15min basis from 7 - 9 am and 4.30 to 6.30 pm in towns and villages near to where our employees live would also be of benefit eg Ardnacrusha, Newcastle west, Sixmilebridge, Newport, Castleconnell.	Noted. Covered under Section 16.2 and Measure SM2
Supporting Measures and Integration	SM2 - Strategic Park and Rides	NTA-C7-35	Park and Ride at Mungret	A park and ride system using a rail stop near Mungret (which could be easily access from the motorway entrance nearby) would be excellent for commuters and could use the existing rail line from Mungret in to Colbert station. A stop at the crescent could easily be done here as well which would also be of great benefit.	Noted. Covered under Section 16.2 and Measure SM2
Supporting Measures and Integration	SM2 - Strategic Park and Rides	NTA-C7-75	Support for P&R	The development of park and rides at key points in the city is very important too. Congestion is continuing to get worse every year and this would allow so many people to leave their cars on the edge of the city.	Noted. Covered under Section 16.2 and Measure SM2
Supporting Measures and Integration	SM2 - Strategic Park and Rides	NTA-C7-24 NTA-C7-26	Prioritise Lisnagry P&R	Early identification of a Park & Ride site in the Lisnagry area.	Noted. Covered under Section 16.2 and Measure SM2
Supporting Measures and Integration	SM4 - Regional Transport Hubs	NTA-C7-76	Coordination at Nenagh	In the context of the LSMATS and the Limerick to Ballybrophy line, we welcome that in the revised strategy it recognised that Nenagh is a regional transport hub. We would like this to see proper co-ordination and integration with road and bus timetables, to allow potential users to interchange between both modes of transport for onward connections.	Noted. No change required.
Supporting Measures and Integration	SM4 - Regional Transport Hubs	NTA-C7-56	Plans for regional transport hubs	The LSMATS proposes to facilitate and promote enhanced services between Ennis, Nenagh and Tipperary Town and Shannon and Limerick, supporting their roles as Regional Transport Hubs. This measure is to be welcomed but it will be essential that local authorities ensure these developments do not negatively impact congestion in these towns. Well-designed plans must be put in place.	Noted. No change required.

Supporting Measures and Integration	SM4 - Regional Transport Hubs	NTA-C7-68	Ennis	<p>Ennis is designated a key town in the RSES and it is important that the LSMATS maximizes the potential of the existing transport infrastructure including the Intercity rail network with Ennis as a Connecting Hub. Investment is needed in the Ennis transport infrastructure to compliment the objective In RSES of transport integration between LSMA and Ennis(Key Town) as a hub. Investment is needed in the Ennis Railway Station in lifts, signaling upgrades, integrates ticketing, cycling infrastructure and integration with “Local Link” services. The investment would achieve some of the stated policy objectives outlined in point C below. €1 m for lifts at Ennis railway station</p> <p>It is critical that a public bus service is provided in Ennis. There is a significant increase in population growth projected for the County town which is the largest town in Munster. Ennis 2040 is seeking to develop opportunities sites through Ennis 2040 to create both investment opportunities to bring both jobs and people to area as well, as to create Irelands first Climate Adaptive town. A sustainable transport system will be essential to supporting the objectives of Ennis 2040</p>	Noted. As Ennis is outside the jurisdiction of the LSMATS, the level of detail provided is regarded as sufficient. The issues raised here are a matter for CCC and the NTA functions outside of the LSMATS. Reference to Town bus added.
Supporting Measures and Integration	SM6 - Behavioural Change and Smarter Travel	NTA-C7-24 NTA-C7-26	Mobility Management Plan training	Information/training in putting in place successful Mobility Management Plans using best practice elsewhere. This request to include how best to promote cycle/walking for workers living in close proximity to the NTP. Information on available supports to fit out businesses to facilitate active travel modes, covered cycle stands, changing facilities, etc. Information on best practice management tools to support car sharing/carpooling.	Noted. Change made to report.
Supporting Measures and Integration	SM6 - Behavioural Change and Smarter Travel	NTA-C7-24 NTA-C7-26	Mobility Management Plan training	Information/training in putting in place successful Mobility Management Plans using best practice elsewhere. This request to include how best to promote cycle/walking for workers living in close proximity to the NTP. Information on available supports to fit out businesses to facilitate active travel modes, covered cycle stands, changing facilities, etc. Information on best practice management tools to support car sharing/carpooling.	Noted. Change made to report.
Supporting Measures and Integration	SM6 - Behavioural Change and Smarter Travel	NTA-C7-56	Information campaigns	Given the lack of awareness of walking and cycle routes within the LSMA, a clear and detailed public awareness campaign of walking and cycling routes, including “Quietways” should be carried out. It will also be beneficial to embed a strong active travel culture within the younger generations, to reduce car dependence from an early stage.	Noted. Green Schools Travel is managed by the NTA and provided for in the LSMATS, as are Smarter Travel Workplaces and Campuses. The NTA, through the Tfi brand, is engaged in on-going awareness campaigns. No change required.
Supporting Measures and Integration	SM7 - Technology for Sustainable Transport	NTA-C7-20	On Demand public transport	The University believes in this context a Public Transport on Demand service is vital if a sustainable shift to public transport is to be achieved.	Noted. The NTA intend to focus on the scheduled bus services as the primary means to serve UL via significant improvements under BusConnects Limerick. No change required.
Supporting Measures and Integration	SM7 - Technology for Sustainable Transport	NTA-C7-17	Electric Car Charging	I am writing to you today, to offer the LEDP Campus as a location for any potential local authority led deployment of further EV charge points.	Noted. This is a matter for Limerick City and County Council. No change required.

Supporting Measures and Integration	SM7 - Technology for Sustainable Transport	NTA-C7-39	EV charging	We believe that to achieve this we must increase investment in, and access to, public charging points for electric vehicles across the LSMA and the region. Currently within the city there are 12 electric charging points, concentrated mainly in the city centre. As we move to decarbonise our economy, we must build the infrastructure needed to transition away from private cars powered by fossil fuels to more sustainable options. We also recommend that all towns and villages that fall within the LSMA be included in any future roll-out of electric charging points for electric and hybrid vehicles.	Noted. The roll-out of EV charging points is primarily a matter for the local authority and other state and private organisations. No change required.
Supporting Measures and Integration	SM7 - Technology for Sustainable Transport	NTA-C7-85	EV charging	Regarding charging points for EVs, we request that an off street Urban Centre Electric Charging Plan is designed for each urban settlement	Noted. The roll-out of EV charging points is primarily a matter for the local authority and other state and private organisations. No change required.
Supporting Measures and Integration	SM8 - Small Public Service Vehicles	NTA-C7-64	Support for Uber	Support for Uber to promote car sharing	Uber, as operated elsewhere, is not facilitated in Ireland under current legislation. No change required.
Supporting Measures and Integration	SM9 - Late Night Transport	NTA-C7-56	Security on late night transport	The LSMA transport network must be viewed as safe and secure at all times of the day. The extension of operating hours on public transport services particularly during night-time hours must incorporate adequate security provisions	Support for strategy measures is noted. Change made to text to reflect safety and security.
Supporting Measures and Integration	Use of Canals	NTA-C7-20	Reopen the Park Canal	The University sees that the reopening of the City's navigation infrastructure would be a significant asset in the provision of both core and amenity transport. A re-assessment of the reopening of the Park Canal is requested in this context.	Noted. The use of canals would not be regarded as a significant potential contributor to passenger transport in the LSMA. No change required.
Supporting Measures and Integration	Bikes on Public Transport	NTA-C7-51	Support for Bikes on PT	Cheap or free bike storage on public transport could far more greatly entice commuters, living in areas greater than 5km outside the city, to combine both modes of transport as a means of travel. If even 5 or 6 angled bike racks were provided in the undercarriage of traditional buses, or stacked bike racks were provided on inner city buses, a cycling and public transport combination could be a far more feasible mode of transport for people living further outside the city.	Noted. A solution for buses which is convenient and safe has not been developed for City routes. All new rail carriages will carry bicycles. No change required.
9. Land Use, Regeneration and Schools					
Land Use, Regeneration and Schools	Land Use Proposal	NTA-C7-19	Account for growth potential at Dooradoyle	We therefore would respectfully request that the finalised LSMATS 2040 would account for the potential increase in population and employment growth between now and 2040 associated with the shopping centre and adjacent lands and in particular their role in lessening the demand for the development of lands on the periphery of the city which are less accessible by sustainable modes.	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.

Land Use, Regeneration and Schools	LU11 - Design of New Schools	NTA-C7-60	Change to LU11	The local authorities will ensure that the detailed design of new schools and schools currently under planning permission will be undertaken in a manner which maximises the priority for pedestrians and cyclists in terms of access arrangements, and the location and quantum of car and bicycle parking. The local authority will ensure that all existing schools will be reviewed to ensure that traffic plans and road layouts on streets surrounding schools are adapted to remove car traffic at drop off and collection times with clear plans and KPIs for both increases in active modes and reduction/removal of motor traffic on a per school basis. The local authority will also redesignate any currently existing drive-thru lanes as active travel routes, removing car traffic access from public streets to internal school roads to improve safety outcomes for children.	Noted. The NTA is rolling out the Safe Routes to School programme with the local authorities and schools across the country and continues to manage the Green Schools Travel Programme with An Taisce on behalf of the DoT. These are covered under LU12 and LU14 and provide for many of these measures to be implemented as appropriate. No change required.
Land Use, Regeneration and Schools	LU11 - Design of New Schools	NTA-C7-61	Changes to LU11	<p>In reference to Measure LU11 – Design of New Schools, Labour ask that the local authority ensures;</p> <ul style="list-style-type: none"> • the detailed design of new schools and schools currently under planning permission will be undertaken in a manner which maximises the priority for pedestrians and cyclists in terms of access arrangements, and the location and quantum of car and bicycle parking; • that all existing schools will be reviewed to ensure that traffic plans and road layouts on streets surrounding schools are adapted to remove car traffic at drop off and collection times with clear plans and KPIs for both increases in active modes and reduction/removal of motor traffic on a per school basis; • the redesignation of any currently existing drive-thru lanes as active travel routes, removing car traffic access from public streets to internal school roads to improve safety outcomes for children; • the roll-out of a robust and expediated delivery programme of schools zones / school streets in schools that have an identified safety issue due to the high levels of competing traffic, unsafe crossings, absence of pedestrian crossings, absence of crossing guards, etc. at the school at drop off and collection times 	Noted. The NTA is rolling out the Safe Routes to School programme with the local authorities and schools across the country and continues to manage the Green Schools Travel Programme with An Taisce on behalf of the DoT. These are covered under LU12 and LU14 and provide for many of these measures to be implemented as appropriate. No change required.

Land Use, Regeneration and Schools	LU12 - Green Schools Travel	NTA-C7-60	Changes to LU12	While we broadly support this measure we would point to the glacially slow pace of rollout of infrastructure changes surrounding schools to date. With the high level of funding available and the infrastructure funding strand of Green Schools falling directly under the NTA's purview we would ask that there is a commitment added to this measure by the NTA to fasttrack funding and support for the Limerick Active Travel Office to deliver as quickly as possible. We would also request that this measure replace "in order to promote alternatives to the private car" with "to identify and implement measures to reduce car access to the school gate and through school grounds."	Noted. The NTA is rolling out the Safe Routes to School programme with the local authorities and schools across the country and continues to manage the Green Schools Travel Programme with An Taisce on behalf of the DoT. No change required.
Land Use, Regeneration and Schools	LU13 - Other Behavioural Change Initiatives	NTA-C7-60	Change to LU13	We would ask that the measure is appended to include: "on both a set annual review and ongoing consultation as projects arise." Consultation with Cycle Buses could be formalised with children feeding into Active Travel plans via meetings and school route cycles with members of the Active Travel Team.	Noted. No change required.
Land Use, Regeneration and Schools	LU14 - NTA Safe Routes to School Programme	NTA-C7-56	Support for SRTS	Development of cycling and pedestrian infrastructure serving schools and promoting walking and cycling for school trips through the promotion of initiatives such as "Safe Routes to School", the 'Green Schools' and 'School Streets' and 'School Zone' projects must be key measures in the LSMATS.	These measures are all provided for in the LSMATS. No change required.
Land Use, Regeneration and Schools	LU14 - Safe Routes to School Programme	NTA-C7-60	Change to LU14	We would ask that an additional bullet point is added to Measure LU14: The reduction and removal of cars from all Limerick Metro Area schools with reserved car access for children with mobility needs.	Noted. It is not the objective to remove all car traffic from all schools, as there will always be some who require car access due to location of homes etc. No change required.
Land Use, Regeneration and Schools	LU14 - Safe Routes to School Programme	NTA-C7-61	Changes to LU14	In reference to Measure LU14 – Safe Routes to School Programme, Labour asks that; <ul style="list-style-type: none"> the original government commitment made in 2009 in the National Cycle Policy Framework to ensure that all school-going children across the country would have a safe cycle route to school by 2020, is reimaged and a new commitment is made to achieve this goal in the coming years. This ambition existed in government when there was little support and little funding, yet government identified the benefits of children becoming more active and using active travel modes to travel to school. Thirteen years later, the roads are busier, more congested and more polluted. The health of our children has significantly worsened by what LSMATS V1 referred to as 'a legacy of car-dependency' in Limerick city and the metro area; the programme takes on board the evidence from the schools zones and school streets trialled by local authorities and communities in Dublin and endeavours to support the 	Noted. The NTA is rolling out the Safe Routes to School programme with the local authorities and schools across the country and continues to manage the Green Schools Travel Programme with An Taisce on behalf of the DoT. These are covered under LU12 and LU14 and provide for many of these measures to be implemented as appropriate. The Cycle Network Plan includes for the delivery of safe cycling infrastructure across the urban area of the LSMA. No change required.

				roll-out of school streets and school zones in similar schools in cities and towns outside Dublin.	
Land Use, Regeneration and Schools	LU2 - City Centre Revitalisation	NTA-C7-43	LNDR impact on City Centre	Construction of a further ring road around the city will bring the city centre into decline. Many retailers have opted for the Shopping Centres on the alternative ring roads around the city – the LNDR would without doubt administer the final blow.	In line with the Minister’s recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister’s Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
Land Use, Regeneration and Schools	LU2 - City Centre Revitalisation	NTA-C7-64	Support for City Centre	ensure the city centre remains the focal growth point review population upwards for city centre	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. Issue covered under LU2. No change required.
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-43	Development pattern of the City	The Tunnel was constructed and developed with the envisaged plan that Limerick city would progress and develop in the direction of Shannon. The focus now seems to develop Limerick City around the University of Limerick – on and adjacent to a Flood Plain.	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-78	Use PT investment to increase density	Instead of matching transport to demand, we should be proactively designing our public transport networks to encourage sustainable and higher density development along those routes.	Noted. Covered under LU3. No change required.
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-86	Deliver PT in advance of development	It is submitted that in order for residential projects to be developed in a sustainable way the public transport links should be put in place first. Planning authorities can then ensure that residential projects are developed close to public transport hubs.	Noted. No change required.
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-66	Rail and Land Use	The strategy then goes on and splits the rail proposals into Phase 1 and Phase 2. The phases are sequential, with Phase 1 focused on the short to medium term and Phase 2 focused on the medium to long term. Based on the strategy’s own assessment as quoted in the paragraphs above, it is imperative that these 2 phases are framed as 2 projects that are developed simultaneously and not sequentially. If we are to achieve our climate targets, we cannot wait for the post 2040 transit oriented land use policies. They need to start being developed from now onwards, in the short term.	Noted. The development of the LSMA rail network will proceed in accordance with measure RL3 and Chapter 19 as the most appropriate response to the rail assessments and transport planning exercises undertaken by the NTA throughout the preparation of the LSMATS. No change required.
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-52	Support for bus route serving development lands	Riverpoint Construction Limited wish to specifically support the development of the extended Bus Route E1 on the Old Cratloe Road and shown on the ‘Potential Short Term Bus Network’ map. This extended bus route E1 passes zoned development lands which are of direct interest to Riverpoint Construction Limited, who are the applicant for current (ref: 21/1800) and future planning applications on these lands. These zoned lands, which form an overall masterplan comprising a crèche, several phases of residential units, neighbourhood centre/units and open space are located immediately west of the junction between the Old Cratloe Road and the Coonagh–Knockalisheen Distributor Road	Noted. No change required.

				(CKDR) which is currently under construction (approx. GPS location 52.682, -8.667)	
Land Use, Regeneration and Schools	LU3 - Principles for the Integration of Land Use and Transport Planning	NTA-C7-56	Support for land use and transport integration	The LSMATS must provide the opportunity to integrate new mixed-use development at appropriate densities with high-capacity public transport infrastructure in conjunction with more attractive walking and cycling networks and public realm improvements	Noted. Covered under LU3. No change required.
Land Use, Regeneration and Schools	LU7 - Thomond Weir	NTA-C7-45	Opposed to linking communities	We submit that the possible walkway/cycle way on the Salmon Weir should not proceed. The communities located on either side of the waterway are opposed to such a development. The Gardaí have also raised concerns regarding the development of such a lane over the Weir. This is due to ongoing local issues that continue in the area.	Opposition to the integration of King's Island into the rest of the city is noted. This runs contrary to good transport planning principles and issues can be dealt with at the local scheme level and will determine at that point whether a scheme should proceed. Text modified.
Land Use, Regeneration and Schools	Regeneration	NTA-C7-56	Access to employment	The Strategy must provide high capacity, affordable, fast, reliable, safe, accessible and inclusive connectivity to employment opportunities. It must provide for affordable, fast, reliable, safe, accessible and inclusive connectivity to schools and colleges.	Noted. No change required.
Land Use, Regeneration and Schools	Third Level Education	NTA-C7-56	Access to 3rd level	Efficient provision of transport to third-level education campuses and the city centre must be prioritised.	Noted. No change required.
10. Freight, Delivery and Servicing					
Freight, Delivery and Servicing	FDS1 - HGV Management	NTA-C7-32	Consideration for operational requirements of postal services	it is requested that the NTA have consideration for HGV movements and the operational requirements associated with the postal service. It is important that 24-hour access for deliveries and collections are maintained at all postal facilities and will not be impacted or limited by the introduction of any restrictive measures including HGV bans, road alterations such as the narrowing of carriageways, the introduction of raised tables or other traffic calming/public realm measures on the surrounding streets or regulating delivery times.	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes.
Freight, Delivery and Servicing	FDS1 - HGV Management	NTA-C7-56	Impact of goods vehicle management on deliveries	Associated logistical implications listed throughout LSMATS, such as restricting the amount of 'lastmile' vehicles in last-mile deliveries, will impact regional supply chain delivery of goods. The strategy must recognise the requirements of existing business operators in the metropolitan area in relation to facilitating and supporting delivery vehicles. Limiting road access could also prove counterproductive as substituting their use with smaller vehicles with less capacity would add to congestion across the LSMA. LSMATS and its regulatory associates must facilitate ongoing stakeholder	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes.

				consultations in order to support businesses and not hinder their day-to-day operations.	
Freight, Delivery and Servicing	FDS1 - HGV Management	NTA-C7-85	HGV management	In relation to HGV Management (Measure FDS1) we request that a similar approach to Dublin City be taken where HGVs with 5+ axles are NOT permitted without a permit to enter restricted areas of Dublin City during certain hours.	Noted. No change required.
Freight, Delivery and Servicing	FDS3 - Rail Freight	NTA-C7-66	Support for rail freight	A greater emphasis needs to be given to rail freight both within the LSMA and in the wider, national context.	Noted. Covered under FDS3. No change required.
Freight, Delivery and Servicing	FDS4 - Regional Freight Strategy	NTA-C7-32	Safeguarding postal services	As such, the introduction of pedestrianisation, parking standards, and car free zones may significantly impact on the smooth operation of the postal service. It is, therefore, requested that the NTA safeguard the accessibility of postal facilities across the Metropolitan Area.	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes. No change required.
Freight, Delivery and Servicing	FDS4 - Regional Freight Strategy	NTA-C7-56	Cooperation on freight	The LSMATS needs to support co-operation between local authorities, logistics companies and business to sustain the implementation of innovative and sustainable modes of delivery within the city centre	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes. No change required.
Freight, Delivery and Servicing	FDS4 - Regional Freight Strategy	NTA-C7-24 NTA-C7-26	HGV strategy	Request for best practice in HGV goods received/delivered and delivery strategies	Noted. The implementation of a freight and delivery strategy will incorporate best practice. No change required.
Freight, Delivery and Servicing	FDS5 - Delivery and Servicing Strategy	NTA-C7-32	Delivery requirements of business	It is requested that the NTA recognise the requirements of existing business operators in the Metropolitan Area in relation to facilitating and supporting delivery vehicles. It is imperative that An Post's services in the Limerick Shannon Metropolitan Area can continue undisrupted and without any conflict that may arise as a result of new transportation measures.	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes. No change required.
Freight, Delivery and Servicing	FDS5 - Delivery and Servicing Strategy	NTA-C7-85	Alternatives to HGV and LGV	We would like to see an expansion of the use of Urban Consolidation Centres with e-cargo bikes and trikes for last mile deliveries and not simply an examination of the case for Urban Consolidation Centres (outlined in Section 15.5.). Given the necessary demand management measures required to reduce car dominance in Limerick City and towns in the area, to achieve the objectives of the strategy, it will be necessary to have a Urban Freight Delivery plan. We would also therefore like to see 7 the permitting of only smaller, non-motorised or smaller, lighter, electric vehicles for delivery and servicing and not solely an assessment of the feasibility of same (as outlined in Section 15.5)	Noted. Change made to report.

Freight, Delivery and Servicing	FDS5 - Delivery and Servicing Strategy	NTA-C7-50	Needs of foodstores	Acknowledge the requirements in the servicing of foodstores in the Draft Transport Strategy and avoid introducing charges to Grocery Home Shopping deliveries	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes. No change required.
Freight, Delivery and Servicing	FDS5 - Delivery and Servicing Strategy	NTA-C7-50	Opposed to restrictions on deliveries	Ensures that objectives and measures do not place any restrictions on deliveries and management of freight movements that could give rise to detrimental impacts upon Tesco's operations.	Noted. The NTA, with the local authorities and other stakeholders, will endeavour to strike a balance between access for essential services and deliveries and the need to foster development of the city centre and metropolitan Limerick through increased potential for activity via sustainable modes. No change required.
Freight, Delivery and Servicing	Tolls	NTA-C7-64	removal of tunnel toll	One possible solution is to subsidise goods vehicles in the tunnel	Noted. This is an operational and contractual matter for TII. No change required.
Covid-19	Long term impact of pandemic	NTA-C7-43	LNDR not required due to WFH	The Pandemic has changed how we live and more especially how we work. Working and learning from home is now commonplace and here to stay. We must evolve and adapt to our environment and future – and persuing a Plan that is now 17 years old is close to ridiculous. The world has changed so much is this time such plans must be revised thoroughly before planning to reinstate them to any County Plan again	In line with the Minister's recommendation contained in the letter received by the NTA in February 2022, and subsequent to further discussions with the Minister's Office after the second round of public consultation, the LNDR does not form part of the final LSMATS.
11. Climate Action Management					
Climate Action Management	Emissions Reduction	NTA-C7-85	emissions reduction	Given the level of ambition required, we request that each intervention should be climate proofed to ensure the maximum emissions reductions are achieved, and that no intervention should proceed that results in increased carbon emissions	Noted. The measures in the LSMATS are primarily intended to promote public transport, walking and cycling in order to reduce emissions. No change required.
Climate Action Management	Emissions Reduction	NTA-C7-83	No need for punitive measures	<p>The inclusion of this section in the draft LSMATS is very welcome. It is recognised in the strategy that it will not achieve the 50% reduction in transport emissions required by 2030. Three approaches have been identified to address this large deficit - 1. increased fuel pricing 2. additional electrification 3. Congestion charging / low emission zones plus road pricing / tolling</p> <p>However, all the measures outlined in this submission, i.e. large scale transit oriented development, 50-60% modal share for cycling (including electric bikes) are approaches that, if embraced enthusiastically, will get the LSMA to the 50% target and will mean that the three punitive approaches listed above are less likely to be required.</p> <p>For this reason, the delivery of the Limerick Commuter Rail Network and a full, safe and connected cycle network which gives people of all ages and abilities the opportunity to cycle or use their e-bike instead of driving should be the highest and most urgent priorities of LSMATS.</p>	<p>Noted. The NTA undertook extensive emissions modelling as part of the LSMATS and the outcome is as expressed in the revised draft report. No evidence has been provided with this submission which demonstrates that such measures would not be required. No change required.</p> <p>At present, there are no Transit-Oriented Development proposals for any location in the LSMA other than Colbert Station and, as set out in the rail assessment report, such an approach would entail a fundamental re-ordering of land use policy across the Mid-West. Even with such an approach in place, this would only apply to growth and as such, the legacy of the existing road-based development pattern would persist which would continue to make up the vast majority of demand by 2030 and 30240. No change required.</p> <p>Investment in commuter rail in Limerick is not forecast under any scenario, to contribute significantly to reducing emissions. The NTA will endeavour to implement all of the LSMA Cycle network to a high standard. No change required.</p>

Climate Management	Action	Emissions Reduction	NTA-C7-60	More ambition on emissions	Develop a more ambitious plan to reduce the projected increase in background growth emissions and create a regularly updated implementation plan that puts us on a trajectory to meet our 2030 and 2050 targets, within the next 6 months.	<p>Noted. The NTA are in full agreement with the urgent requirement to reduce emissions from transport and undertook extensive emissions modelling as part of the LSMATS. The outcome of that assessment is as expressed in the revised draft report. It should be highlighted that in order to significantly reduce emissions, the focus of interventions needs to be on long-distance trips undertaken by petrol and diesel fuelled vehicles. Tackling short intra-urban trips of less than 10km will not deliver sufficient reductions. No change required.</p> <p>The LSMATS measures, including assumptions related to demand management, make a significant contribution to reaching the 50% assumed target. There are additional measures, outside the remit of the LSMATS that will also be required. These include greater demand management measures, which are a matter for central Government, and reductions in emissions from the freight sector, which is related primarily to the availability of vehicle and fuel technology. No change required.</p>
Climate Management	Action	Emissions Reduction	NTA-C7-70	Concern with emissions reductions	<p>In particular I am concerned by the following excerpt setting out the plan to come up with more studies and enabling frameworks in the early stages of the strategy which is totally incompatible with the urgency required to either meet the targets or meet the small and vanishing window of opportunity identified by the IPCC.</p> <p>Following the adoption of the final LSMATS, it is intended that an additional demand management study will be undertaken, in conjunction with a further examination of goods vehicles' operation, to develop finalised proposals to achieve the intended level of emissions reductions.</p>	<p>Noted. The NTA are in full agreement with the urgent requirement to reduce emissions from transport and undertook extensive emissions modelling as part of the LSMATS. The outcome of that assessment is as expressed in the revised draft report. It should be highlighted that in order to significantly reduce emissions, the focus of interventions needs to be on long-distance trips undertaken by petrol and diesel fuelled vehicles. Tackling short intra-urban trips of less than 10km will not deliver sufficient reductions.</p> <p>The LSMATS measures, including assumptions related to demand management, make a significant contribution to reaching the 50% assumed target. There are additional measures, outside the remit of the LSMATS that will also be required. These include greater demand management measures, which are a matter for central Government, and reductions in emissions from the freight sector, which is related primarily to the availability of vehicle and fuel technology. No change required.</p>
Climate Management	Action	Emissions Reduction	NTA-C7-78	Larger reduction in emissions	I am concerned that the actions developed will not contribute enough to Irelands climate emissions reductions targets. I urge you to commit to a larger reduction in emissions and seek more ambition in your proposals that will put Limerick on a more sustainable pathway.	<p>Noted. The NTA are in full agreement with the urgent requirement to reduce emissions from transport and undertook extensive emissions modelling as part of the LSMATS. The outcome of that assessment is as expressed in the revised draft report. It should be highlighted that in order to significantly reduce emissions, the focus of interventions needs to be on long-distance trips undertaken by petrol and diesel fuelled vehicles. Tackling short intra-urban trips of less than 10km will not deliver sufficient reductions.</p> <p>The LSMATS measures, including assumptions related to demand management, make a significant contribution to reaching the 50% assumed target. There are additional measures, outside the remit of the LSMATS that will also be required. These include greater demand management measures, which are a matter for central Government, and reductions in emissions from the freight sector, which is related primarily to the availability of vehicle and fuel technology. No change required.</p>

Climate Management	Action	Emissions Reduction	NTA-C7-41	Consistency with Climate Action Plan	A reduction in emissions of 35% over 2018 levels by 2030 proposed in the Strategy is not consistent with the national climate objective	<p>Noted. The NTA are in full agreement with the urgent requirement to reduce emissions from transport and undertook extensive emissions modelling as part of the LSMATS. The outcome of that assessment is as expressed in the revised draft report. It should be highlighted that in order to significantly reduce emissions, the focus of interventions needs to be on long-distance trips undertaken by petrol and diesel fuelled vehicles. Tackling short intra-urban trips of less than 10km will not deliver sufficient reductions.</p> <p>The LSMATS measures, including assumptions related to demand management, make a significant contribution to reaching the 50% assumed target. There are additional measures, outside the remit of the LSMATS that will also be required. These include greater demand management measures, which are a matter for central Government, and reductions in emissions from the freight sector, which is related primarily to the availability of vehicle and fuel technology. No change required.</p>
Climate Management	Action	Emissions Reduction	NTA-C7-69	Achieve 50% reduction	Match the ambition of the strategy to the required climate reductions. i.e., ensure the implementation of the strategy can reasonably be expected to meet the required reduction of 50% by 2030 and ensure that the transport system has identified and is on a trajectory to reach net zero by 2050 in line with national commitments.	<p>Noted. The NTA are in full agreement with the urgent requirement to reduce emissions from transport and undertook extensive emissions modelling as part of the LSMATS. The outcome of that assessment is as expressed in the revised draft report. It should be highlighted that in order to significantly reduce emissions, the focus of interventions needs to be on long-distance trips undertaken by petrol and diesel fuelled vehicles. Tackling short intra-urban trips of less than 10km will not deliver sufficient reductions.</p> <p>The LSMATS measures, including assumptions related to demand management, make a significant contribution to reaching the 50% assumed target. There are additional measures, outside the remit of the LSMATS that will also be required. These include greater demand management measures, which are a matter for central Government, and reductions in emissions from the freight sector, which is related primarily to the availability of vehicle and fuel technology. No change required.</p>
12. Modelling						
Modelling		Model outputs	NTA-C7-70	Forecast road safety metrics	I also note that the modest reductions in injuries and fatalities forecast in this plan (see table 9-2 of the transport Strategy modelling assessment report) does not align with the much more ambitious reductions outlined in the RSA strategy.	Noted. These are model outputs used solely for the determination of the Benefit: Cost ratio of the strategy and are not related to the targets, which are a matter for the RSA.
Modelling		Modelling for E-Bikes	NTA-C7-66	Model E-Bikes	We would like to see electric bikes considered in the modelling and featured more prominently in the strategy as they will play an important role in achieving the target of 1 million electric vehicles by 2030, especially for the population living in the currently car-dependent suburbs in Dooradoyle, Raheen, Mungret, Castletroy, Monaleen and Annacotty, as well as Castleconnel and Patrickswell.	Noted. The modelling assumed a high propensity to cycle by adjusting the parameters to lower the "cost" of cycling relative to other modes. This was intended to, inter alia, reflect the use of E-bikes to the extent feasible given the absence of relevant, useable data at a regional level. The LSMATS proposes a comprehensive cycle network which will place no limit on the numbers cycling on all bicycle types. As data on E-bikes, and the associated increase in length of cycle trips undertaken, modelling will be refined and updated accordingly.

Modelling	Modelling for E-Bikes	NTA-C7-60	Ebikes and modelling	Update modelling to include electric bikes and their capacity. There seems to be no acknowledgement of electric bikes or their capacity for commuting in the modelling data, This needs to be rectified and updated?	Noted. The modelling assumed a high propensity to cycle by adjusting the parameters to lower the "cost" of cycling relative to other modes. This was intended to, inter alia, reflect the use of E-bikes to the extent feasible given the absence of relevant, useable data at a regional level. The LSMATS proposes a comprehensive cycle network, which will place no limit on the numbers cycling on all bicycle types. As data on E-bikes, and the associated increase in length of cycle trips undertaken, modelling will be refined and updated accordingly.
Modelling	Modelling for E-Bikes	NTA-C7-83	Modelling E-bikes	There is no mention of electric bikes in the transport modelling assessment report and just a single mention in the draft LSMATS. This suggests that their potential for mobility within the LSMA has not been properly assessed, if at all	Noted. The modelling assumed a high propensity to cycle by adjusting the parameters to lower the "cost" of cycling relative to other modes. This was intended to, inter alia, reflect the use of E-bikes to the extent feasible given the absence of relevant, useable data at a regional level. The LSMATS proposes a comprehensive cycle network, which will place no limit on the numbers cycling on all bicycle types. As data on E-bikes, and the associated increase in length of cycle trips undertaken, modelling will be refined and updated accordingly.
Modelling	Modelling reports	NTA-C7-64	Make reports available	Make availabel all TIAs	There are no TIAs undertaken as part of regional transport strategies. The Modelling report was published. No change required.
Modelling	Planning Sheet	NTA-C7-85	Inclusion of SDZ	Given that the Office of the Planning Regulator has recommended that it be removed from the Clare County Development Plan, it should not be included in LSMATS, as LSMATS will subsequently be adopted into the Limerick City and County Development Plan.	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.
Modelling	Planning Sheet	NTA-C7-86	conservative forecasts population	It is submitted that these projections are likely to be conservative as they do not take account of the impact of the offshore wind industry boom that is expected to see the development of a very large energy industry in the region. T	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.
Modelling	Planning Sheet	NTA-C7-41	Planning Sheet consistency with NPF	This planning data sheet assigns the majority of population growth in a 'doughnut' arrangement on greenfield sites at the periphery of the city. This is in direct contravention of the policy outlined in the National Planning Framework where 50% of growth in regional cities will be developed within their existing built-up footprints	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.
Modelling	Planning Sheet	NTA-C7-83	Planning forecasts not valid	. The planning datasheets that underpin the transport modelling assessment report contain land use assumptions and population targets for various areas within the LSMA that are no longer valid because they predate any discussion for significant transit oriented development and also predate the new county development plans, which have new zoning and population densities contained within them.	The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities. No change required.

Modelling	Rail Assessment	NTA-C7-85	Issues related to Rail assessment	<p>We believe, however, that the transport strategy is not optimising the potential of rail, by not factoring in the impact of Transit-oriented Development within the assessment of rail options.</p> <p>Given the level of ambition necessary for modal shift, and the positive impact of Transit-oriented Development, we would argue for the maximum rail intervention being made, with stations and twin tracking as outlined in Rail Option 4 of the Modelling Assessment Report</p> <p>It is worthwhile noting that the revised LSMATS is using obsolete projected population data. For example, the proposed Colbert Station Masterplan is designed with a residential population of over 6000 in mind, while LSMATS indicates a population growth within the city centre of just over 2300.</p> <p>In addition, the Modelling Assessment for Rail does not take into account the impact of multi-modal catchment areas, and in particular using e-mobility to expand the catchment area of the proposed rail lines</p>	<p>The land use forecasts used in the LSMATS are determined by the National Planning Framework, the Regional Spatial and Economic Strategy and the County Development Plans. The NTA agreed the distribution of population, employment and other land uses with the Southern Regional Assembly and the local authorities.</p> <p>The Rail Assessment Report, published with the revised draft, sets out in great detail, an alternative Transit-Oriented Development scenario in order to demonstrate its impact on the viability of rail development.</p> <p>The Rail Assessment report was undertaken using the most up-to-date modelling techniques based on empirical evidence and therefore represents realistic examination of rail in the LSMA.</p> <p>No change required.</p>
Modelling	Rail Assessment	NTA-C7-78	Issues with rail assessment	<p>The Rail modelling exercise lacks ambition and a basic understanding of how modelled Public transport demand works. All the options proposed for the commuter Rail network only have between 2 and 3 trains per direction per hour during the am peak except for a small section between Cratloe, Moyross and Limerick Colbert where it has 6 trains per hour (option 2,3 & 4). The Dart+ project in Dublin seeks to have up to 12 trains per hour per direction on some lines. The Cork CMATS proposes to have between 6-12 trains per hour per direction</p> <p>I would encourage you to seek more ambition in terms of Rail re-investment. In order to meet our climate targets we need to really expand the use of public transport and in particular seek to maximise the existing networks. Please seek an update of the transport modelling reports to include a more appropriate and realistic service offering.</p>	<p>The Rail Assessment report was undertaken using the most up-to-date modelling techniques based on empirical evidence and therefore represents realistic examination of rail in the LSMA.</p> <p>It is not realistic to provide similar levels of service as DART in the LSMA as the population and employment levels are significantly lower and significantly more dispersed than in Dublin.</p> <p>No change required.</p>

Modelling	Rail Assessment	NTA-C7-76	Issues with Rail Assessment	<p>the timetable modelling seems to take no account of the ongoing track upgrades and proposed resultant line speed increases on the Limerick to Ballybrophy line. This will affect the timetable offering by reducing journey times and potentially reducing the number of trains needed to operate the line, also reducing its operating cost</p> <p>its assumptions and forecasts should be questioned as the numbers of boardings and alightings seem very low</p> <p>It is not clear if the modelling for the proposed increased service levels as indicated in the analysis is based off current housing development and, by extension, latent demand remaining at static levels for the line's areas, or if it in any way takes account of people's needs and desires to change to more environmentally friendly forms of transport for commuting and leisure travel. It also does not seem to consider the potential for the line to facilitate increased housing and revitalisation of the towns along the line instead of concentrating development closer to Limerick.</p> <p>the base modelling used by Systra/Jacobs is incorrect and will affect both the demand forecasting and the cost of delivery of additional services. We believe that the final strategy needs to relook at the modelling</p> <p>NTCRP believe the modelling as a result of the comments above and as illustrated</p> <p>in Table 8 Bypass Loop Requirements is void. To allow the delivery of a 30 minute headway it requires the provision of just one additional crossing point at Nenagh. This would need for the currently unused loop platforms at Birdhill and Roscrea to be brought back into use and allow trains to cross and passengers alight when crossing services. It should be possible to bring them back into operation at a relatively low cost and, by using adjacent road access, to negate the need to provide costly new footbridges at both stations.</p> <p>We believe that the figures quoted in Appendix B of €170m for the delivery of option 2 is for a fully electrified railway and is in excess of what investment is required to deliver option 2 in the short to medium term.</p>	The Rail Assessment report was undertaken using the most up-to-date modelling techniques based on empirical evidence and therefore represents realistic examination of rail in the LSMA. No change required.
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Modelling	Rail Assessment	NTA-C7-81	Issues with rail assessment	<p>the timetable modelling seems to take no account of the ongoing track upgrades and proposed resultant line speed increases on the Limerick to Ballybrophy line. This will affect the timetable offering by reducing journey times and potentially reducing the number of trains needed to operate the line, also reducing its operating cost</p> <p>its assumptions and forecasts should be questioned as the numbers of boardings and alightings seem very low</p> <p>It is not clear if the modelling for the proposed increased service levels as indicated in the analysis is based off current housing development and, by extension, latent demand remaining at static levels for the line's areas, or if it in any way takes account of people's needs and desires to change to more environmentally friendly forms of transport for commuting and leisure travel. It also does not seem to consider the potential for the line to facilitate increased housing and revitalisation of the towns along the line instead of concentrating development closer to Limerick</p> <p>On this basis the base modelling used by Systra/Jacobs is incorrect if it has used the wrong journey times and this will affect both the demand forecasting and the cost of delivery of additional services. This also has an impact on the number of units and train crews required to operate services. I believe that the final strategy needs to relook at the modelling.</p>	repeat
Modelling	Update model	NTA-C7-64	Update model	update model to account for Covid-19 and 2022 Census	The 2022 Census is not available. An alternative future demand scenario was examined which reduced demand for travel as a result of greater levels of WFH etc. No change required.
13. Policy Review					
Policy Review	RSES and MASP	NTA-C7-49	Need for greater clarity on RSES and MASP	While the reference to RSES policy in Part A, Section 4 is noted, it is considered that supporting text in either Part A, Section 1 or 2 should detail the significant role that the LSMATS has in implementing the RSES transport strategy and by extension Project Ireland 2040. This should acknowledge the statutory role of objectives of the RSES and the Limerick-Shannon MASP in addition to the policy objectives of the NPF.	Noted. Changes made to the report.
Policy Review	Spatial Scope	NTA-C7-71	include Broadford	Please can Broadford be included in this plan and given that a huge amount of east Clare traffic to Limerick passes through Broadford, the very least there should be a park and ride and a daily bus service to limerick city.	Broadford is outside the LSMA. No change required.
Policy Review	Specific changes throughout text	NTA-C7-68	Changes to strategy	Clare County Council submission - to be reviewed when finalising report with the LSMATS Steering Group.	Noted. Changes made to the report.

Pillars of the LSMATS	New Pillar	NTA-C7-61 NTA-C7-60	Health as a pillar and priority	<p>Labour believe that 'better public health' must be a stand-alone strategic pillar of LSMATS - due to the crucial link between health and transport. Better health should underpin our transport ambitions to 2040 as our population increases and as our population's age. Also the value of urban green space is understood now more than ever in terms of a nature based health solution - therefore transport and projected land use planning - must consider health impact in these plans</p> <p>Prioritise becoming a Healthy City with an approach that seeks to put health high on the political and social agenda of Limerick to build a strong movement for public health at the local level. Successful implementation of this approach requires innovative action addressing all aspects of health including transport systems.</p>	Public health is covered as a strategic objective. No change required.
Overarching Environmental Matters	Air Quality	NTA-C7-59	Air pollution	<p>Whilst we recognise that the ambition is to reduce air pollution by 82% in NOx over the lifetime of the plan, there is no delivery mechanism identifiable in LSMATS. Transport related traffic emissions should be a target for clearly defined exposure mitigation measures measured on an annual basis. The role that schools play should also be included and how different strategies like Safe Routes to School will collect data to determine effectiveness at school gates and other heavily polluted environments.</p>	Noted. Change made to report.
Overarching Environmental Matters	Air Quality	NTA-C7-61 NTA-C7-60	Greater emphasis on air pollution	<p>Transport-related air pollution is a widespread public health issue and action needs to be taken in our transport strategies across the country to improve traffic pollution which relates to a wide range of other adverse health outcomes. Therefore, traffic emissions should be a target for exposure-mitigation strategies, which should be clearly defined and measured on an annual basis. The role that schools play should also be included and how different strategies like Safe Routes to School will collect data to determine effectiveness at school gates and other heavily polluted environments</p>	Noted. Change made to report.

Appendix 3 – Revised Draft LSMATS - Response to Environmental Authorities

REF	Comment	Response
DAU/NPWS		
1	<p>The Department is conscious that this Strategy is a high level plan and that many matters in it can only be fully clarified by subsequent lower level plans. Where progression of the Strategy is dependent on matters to be established in future assessments it is important that this plan acknowledges that and provides for the possibility that certain assessments could be negative and that in those circumstances certain aspects of the Strategy should not proceed or could only proceed in certain prescribed circumstances (e.g. Article 6(4)).</p>	<p>SEA and NIS have been updated to further clarify that progression of projects and plans included with the LSMATS would be dependent on project level assessments and in the case that these project level assessments identify AESI that an alternative solution will be sought which avoids/reduces the impact to a level that ensures the integrity of the designated site remains unaffected.</p> <p>The NIS has updated to state that: <i>Throughout this plan-level assessment it is assumed that measures/projects resulting from the LSMATS will require further assessment at a project level to determine potential for LSE/AESI and an appropriate strategy to ensure that the conservation objectives of a European site(s) are not compromised, and that site integrity can be preserved. At a project level should issues arise under Article 6(3) of the Habitats Directive, despite the implementation of avoidance/mitigation measures, and there remains a risk of AESI of a European site, the project will not be progressed unless an alternative solution cannot be identified, or additional measures implemented which avoid the potential for AESI. Where alternative solutions cannot be identified project level assessments utilizing the full provisions for AA as set out in the requirements of the EU Habitats Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora may be necessary.</i></p>
2	<p>In relation to Strategic Environmental Objective 3 “Prevent damage to, maintain and where appropriate enhance, terrestrial, aquatic and soil biodiversity, particularly EU and national designated sites and protected species.” it is clear that even at this early stage prior to route selection, potential significant negative effects of the plan have been identified and a range of SEA mitigation is proposed. It is this Department’s view that before mitigation is considered avoidance should be the priority. In the first instance routes should be selected which will avoid negative impacts on in particular EU and nationally designated sites and protected species. The Department accepts that it may be intended at detailed design stage to avoid designated sites and species; however, the Department believes this should also be reflected now at this early stage in hierarchical order above mitigation and be stated clearly and prominently in the Strategy. Where avoidance is not possible it is accepted that there may be routes where interface with a designated site or sites cannot be prevented and in these cases mitigation will need to be considered. In relation to mitigation, the Department welcomes the statement in G1 of Table 7.6 of the SEA that “should issues arise under Article 6(3) of the Habitats Directive at the design stage and the assessment at that stage determines that there are likely to be adverse effects on the integrity of a European site, an alternative solution shall be required”; however it is unclear, and there is no evidence presented, that the Strategy has considered whether realistic alternatives exist in all cases and the Department is concerned that this plan would create a pressure to proceed with projects that could have adverse conservation outcomes rather than preventing them at a strategic level. To take one example, the plan has proposed and produced an indicative map of a cycleway from Limerick to Shannon along the edge of and possibly in places within the River Shannon and River Fergus Estuaries Special Protection Area (SPA) and Lower River Shannon Special Area of Conservation (SAC), this has clear potential for adverse effects on site integrity through disturbance and habitat loss or degradation. Mitigation may be able to address some of these adverse effects on site integrity (AESI); however, if the appropriate assessment determines that an alternative solution is required and the only alternative solution is moving the cycleway onto adjoining land which is either not within the powers or budget of the project to acquire then no such alternative exists in reality but the Strategy will have stated that “no potential significant residual negative effects are anticipated following implementation of the SEA mitigation recommended”. If the National Transport Authority (NTA) is confident that such a budget and powers will be available to it, if required, then it is reasonable to consider this as</p>	<p>SEA and NIS have been updated to emphasise the application of mitigation hierarchy and that avoidance should be a priority and a prominent aim within the strategy.</p> <p>A definition of the mitigation hierarchy has been added to the SEA to clarify the meaning of mitigation in the assessment.</p>

	potential mitigation; however, it would be incorrect to consider it as possible mitigation if it is not realistically achievable and would create great pressure to proceed with a project which cannot be fully mitigated. It is the function of Strategic Environmental Assessment (SEA) to foresee and try to prevent such a situation. Similar scenarios appear possible elsewhere also, such as proposed cycleways along the banks of the Shannon further upstream, again potentially affecting designated habitats and species. The Department suggests that prior to the SEA determining that “no potential significant residual negative effects are anticipated following implementation of the SEA mitigation recommended” the SEA must first determine that such mitigation particularly alternative location is realistically possible in all cases.	
3	The commitment given to alternative solutions also only relates to European Sites and no commitment has been made in relation to other ecologically important sites. If an adverse effect to a Natural Heritage Area (NHA), proposed NHA or other area of ecological interest cannot be avoided by mitigation other than finding an “alternative solution” then it appears no such commitment is contained in the Strategy and this in the Department’s view is a potential significant negative effect on SEO 3.	The SEA includes the national level designations in the requirements for the application of the mitigation hierarchy and these are referred to within all the assessment tables alongside the European sites.
4	As stated the Department welcomes the statement of G1; however, the various tables where mitigation is considered and some of the listed habitat and species mitigation measures do not reference this commitment and may give the impression that mitigation other than finding an alternative will in all cases be sufficient. This Department does not, at this stage, accept that this can be concluded. Therefore reference to alternative solutions should also be made in the tables and elsewhere in the SEA and Natura Impact Statement (NIS)/Appropriate Assessment (AA) when mitigation and potential outcomes are discussed.	Mitigation sections in the SEA and NIS to be updated to reflect the wording within G1 (i.e. “should issues arise under Article 6(3) of the Habitats Directive at the design stage and the assessment at that stage determines that there are likely to be adverse effects on the integrity of a European site, an alternative solution shall be required”) within the relevant mitigation section for specific habitats and species.
5	In the SEA the Department considers that the weighting of the potential impacts on SEO 3 are not proportionately represented in Table 7.5 and various other tables. The potentially positive effects of the plan listed as “Reduction in transport related emissions of air pollutants including nitrogen oxides (NOx), particulate matter (PM) and sulphur dioxide (SO2)” while welcome and desirable would not be in any way equal in magnitude to the potential negative effects of for example permanent loss of habitat or permanent disturbance of a sensitive species. It is questionable whether a reduction in current traffic related air pollution levels would have any effect on key conservation interests in the zone of influence. In addition while the aims of the plan might reduce air emissions generally, it is possible that particular routes adjoining sites (e.g. the Adare bypass) would bring such emissions closer to them therefore increasing local impact. This Department does not consider possible benefits to general air quality to be in any way a balance against damage to protected sites or species. Therefore the Department considers that the weighting and associated colour coding allocated in the various tables of the report to potential impacts on SEO 3 without mitigation, should be negative (-). Similarly the summary assessment weighting with recommended SEA mitigation is given as +/-0 but the Department does not believe this can be established at this stage and in the Department’s view a “?” weighting would be more appropriate.	SEA assessment for SE03 has been updated reflect that the risks to habitats and species from construction is not balanced by potential improvements in air quality or opportunities for habitat enhancement. The scoring but to include negative (-) and post mitigation to(0/- to reflect that mitigation uncertainty remains.
6	Mitigation of the type listed, other than alternative solutions, may work well for some habitats and species but may not for others and this can only be determined in lower level plans with more information on exact routes and impacts. The listed +/-0 weighting could be justified if a commitment was made that any aspect of future projects under the strategy would not proceed where adverse impacts cannot be ruled out or cannot be adequately compensated for; however it is not clear at this time that this is assured. To justify the +/-0 weighting the mitigation would need to incorporate a statement that projects, including areas of ecological interest which are not European Sites, which cannot be satisfactorily mitigated or compensated for, will not proceed. The Department does not accept that it is possible at this early stage, without even confirmation of routes, to conclude that all projects will not have adverse impacts on sites or species and that mitigation or compensation will be possible in all cases.	Wording in SEA and NIS has been updated to clarify and states that: <i>At a project level should issues arise under Article 6(3) of the Habitats Directive, despite the implementation of avoidance/mitigation measures, and there remains a risk of AESI of a European site at a project level, the project will not be progressed unless an alternative solution cannot be implemented which avoids the potential for AESI. Where alternative solutions cannot be identified project level assessments utilizing the full provisions for AA as set out in the requirements of the EU Habitats Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora may be necessary. (This commitment is embedded throughout Section 5 of the NIS)</i> SEA assessment for SE03 has been updated reflect that the risks to habitats and species from construction is not balanced by potential improvements in air quality or opportunities for habitat enhancement. The scoring but to include negative (-) and post mitigation to(0/- to reflect that mitigation uncertainty remains.

7	In relation to 7.3.2 “Summary of Preferred Approach Assessment” and the overall conclusions of the SEA, while acknowledging the substantial mitigation proposed, it is this Department’s view that at this early and high level stage there remains uncertainty regarding the degree to which mitigation identified for implementation at project level assessment would be successful in offsetting potential negative effects for nature conservation.	SEA wording has been amended to reflect the approach in the revised NIS wording and need to prioritise avoidance of impacts.
8	In general, given the current level of knowledge, the Revised Draft Limerick-Shannon Metropolitan Transport Strategy incorporating SEA, AA and NIS is in the Department’s opinion overly optimistic in the ability of adverse effects on ecological receptors to be mitigated beyond concern. The Department agrees that mitigation will be effective in preventing some adverse effects on sites and species; however, at this stage in the absence of even confirmed routes or knowledge of habitats and species to be impacted it cannot be concluded that mitigation will, in all cases, be satisfactorily achieved. The SEA conclusion is that “mitigation measures to reduce or where practicable, fully mitigate” potential impacts are sufficient to exclude significant residual negative effects on nature conservation; however this is very much a qualified statement and in some cases it may not be practicable and reduction may not be sufficient to exclude significant negative effects.	The NIS and SEA have been revised to further highlight the approach in terms of prioritising avoidance in the mitigation hierarchy by considering alternative solutions where needed and to apply project level appropriate assessment.
9	In chapter 4 of the Natura Impact Statement potential AESI are identified for various European Sites. Chapter 5 then details the Mitigation that will be utilised to safeguard the integrity of Sites. The Department notes that several listed mitigation measures detail activities being “minimised” (e.g. E03, CAF1, LA1, AS1, AS4, and LHB2) and the later conclusion of the NIS is that the mitigation is sufficient to ensure no AESI. This is of concern because if an activity has been correctly identified as having a potential adverse effect on the integrity of a site then the term “minimise” is vague and subjective and minimising an activity may not be sufficient to rule out AESI. The Department would suggest wording that would clarify that such activities would only proceed if it is established that they will not have AESI rather than simply be minimised and that they will not take place otherwise.	Wording in the NIS section 5 has been updated. Wording of the NIS throughout Section 5 and Table 5.1 has been amended to address this comment.
10	In the case of E01 Mitigation for European Otter in the Lower River Shannon SAC, the potential AESI is listed as “Direct physical loss/damage to habitats” and the mitigation described is “Detailed surveys shall be required and provided for in order to fully understand and mitigate for this risk at design stage”; the Department understands the intention here is to avoid or mitigate specific areas identified as AESIs in the detailed surveys; however, the studies themselves are not mitigation they are a tool to inform avoidance or potential mitigation or to recognise the unsuitability of mitigation and it is possible that unmitigable AESIs could be identified by the same studies and therefore the measures described to avoid the AESI should include a statement that in such circumstances that aspect of the project will not proceed or will only proceed subject to article 6(4) of the Habitats Directive.	Wording in the NIS has been updated to amend E01 to state the following: <i>Detailed surveys shall be required and provided for in order to fully understand the distribution and habitats usage (i.e. location of sensitive location such as holts or natal dens). This information shall be used to inform project design stage to determine appropriate avoidance or mitigation measures.</i>
11	In relation to E04 and obstruction to connectivity; wording should be changed from “should be alleviated” to “shall be alleviated through installation of appropriately designed mammal passes”.	Wording of E04 has been changed within the NIS in line with the comment provided.
12	In LHB1 Mitigation measures for Lesser Horseshoe Bats – Curraghchase Woods SAC; the mitigation states “Where there is the potential or actual bat movement in the area of the proposed route, provision will be made to avoid impeding bat flight paths by the design of appropriate vegetative landscaping and underpasses”. Such mitigation may be possible but this measure assumes that it will be possible and sufficient to prevent AESI, this Department is not without the required surveys and assessment certain that such mitigation will be possible and therefore in the Department’s view a caveat is required to state that where potential AESIs cannot be excluded through mitigation this aspect of the project will not proceed or will only proceed subject to article 6(4) of the Habitats Directive.	Wording in the NIS has been updated with a statement to clarify that: <i>At a project level should issues arise under Article 6(3) of the Habitats Directive, despite the implementation of avoidance/mitigation measures, and there remains a risk of AESI of a European site at a project level, the project will not be progressed unless an alternative solution cannot be implemented which avoids the potential for AESI. Where alternative solutions cannot be identified project level assessments utilizing the full provisions for AA as set out in the requirements of the EU Habitats Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora may be necessary.</i>
13	In relation to Disturbance/displacement of Special Conservation Interest Bird Species – Ballyallia Lough SPA, Lough Derg (Shannon) SPA and River Shannon and River Fergus Estuaries SPA; the Department notes and welcomes the commitment in Measure Ref. B3 that in cases	Comment noted - similar wording has been incorporated throughout the NIS and within the mitigation section.

	where “despite the implementation of mitigation measures, there remains a risk that disturbance or displacement at a project level then the project will not be progressed unless an alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the related SPA remains unaffected”. The Department would like to reiterate its view that in the first instance potential ecological conflicts should be avoided by route selection which avoids the requirement for complex mitigation.	
EPA		
14	The SEA should show what the revisions to the Draft Plan are, where they have been incorporated into the Plan and how they were assessed. Where any of the revisions were identified as having the potential for likely significant effects the SEA should show what the SEA proposes to address these. This could be achieved by including a table, which summarises the revisions.	The SEA identifies the additional plan alternative considered with the amendments compared to others and identifies how taking this alternative forward in the draft Plan has changed the assessment - see Section 7.2 and section 7.3. Amendments will be summarised in a table in the SEA Statement addressing how consultation and the assessment have influenced the final plan. Noted
15	Where the SEA identifies any revisions as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those aspects.	
16	The Plan, prior to its adoption, should also consider and integrate the recommendations of the SEA.	The Strategy includes a section on the environmental assessments and their findings and also specific commitments to implement the SEA recommendations and monitoring plan.
DECC/EPD		
17	comment re waste issues consultation	Documents have been provided as part of a public consultation and have been available for consultation comment
GSI		
18	No specific comments	No action