



**Shannon
Chamber**
Advancing business together

**LIMERICK /SHANNON
METROPOLITAN AREA TRANSPORT STRATEGY
2040 (LSMATS)**

Shannon Chamber Submission

October 2020

PREFACE

The Limerick-Shannon Metropolitan Area Transport Strategy will be instrumental in the regeneration and transformation of Limerick City and the wider Limerick-Shannon Metropolitan Area.

Regional Spatial and Economic Strategy for the Southern Region

The Strategy will deliver a high-quality, accessible, integrated and more sustainable transport network that supports the role of the Limerick-Shannon Metropolitan Area as the major growth engine of the Mid-West Region, an internationally competitive European city region and main international entry to the **Atlantic Corridor**. [Shannon Chamber would recommend using the term *Atlantic Economic Corridor* in this and all such references to the Corridor]

Draft Limerick / Shannon Metropolitan Area Transport Strategy

Shannon Chamber welcomes the opportunity to make a submission to the Draft Limerick / Shannon Metropolitan Area Transport Strategy (LSMATS), and to offer constructive suggestions concerning the further refinement of the draft.

Shannon Chamber greatly appreciates the availability of both Hugh Creegan, Deputy Chief Executive and Director Transport Planning and Investment and David Clements, LSMATS Project Manager to give a presentation on the Strategy to representatives of both the Chamber board and Chamber membership. Direct interaction of this nature with the authors of such strategies is most beneficial as it enables both parties to fully comprehend the collective objectives, which greatly assists in the generation of refinements that match the needs of all stakeholders.

Shannon Chamber maintains a very interactive relationship with its members and has found their input most insightful when responding to submissions of this nature; we have also adopted this strategy when preparing our input to the draft Shannon Town Masterplan and will be doing so when responding to the Clare County Development Plan Issues Paper – plans which also impact on the LSMATS. Shannon Chamber would therefore expect that linkages with Clare County Council and consideration of such strategies have/will also inform the final draft of the LSMATS.

INTRODUCTION

As mentioned during our meeting, the most important factor in devising a Transport Strategy for Shannon is that the totality of Shannon is taken into consideration and the three core elements of Shannon – the Town Centre, Shannon Free Zone, and Shannon Airport, are inter-connected and easily accessible by both residents and visitors alike. Any future development of Shannon must combine the living, working and leisure aspects of the town as a unit, not as separate attributes. This has been pointed out in Shannon Chamber’s submission to the preparation of the Shannon Town Masterplan. It is important therefore that the LSMATS is considered vertically and not functionally i.e. in consultation with the plans being drawn up by both Clare County Council (CCC) and Limerick City and County Council (LCCC) for their respective jurisdictions to ensure cohesion and appropriateness of deliverables.

Having studied the draft LSMATS in detail, Shannon Chamber welcomes the extensive consideration that has been given to Shannon in the preparation of the Strategy, as explained in greater detail in our Teams meeting, particularly with regard to how certain conclusions were arrived at, particularly regarding rail connectivity and park and ride facilities linking Shannon with Limerick.

To maintain consistency of message, this submission will present:

- Commentary on the draft as currently written; and
- A summary of the key points which Shannon Chamber would like to see addressed in the next/final draft.

DRAFT LSMATS ...Suggested Amendments/Additional Comments

Section 1: Introduction

- **P3: Current Challenges: 2nd bullet point**

The existing point made in the document is good but Shannon Chamber would recommend adding the word 'integrated' to the sentence , *'Support a vibrant, accessible and integrated Shannon Town, Airport and Free Zone'* to emphasise, as outlined at our meeting and in the introduction, the requirement for increased interaction between the airport, zone and town. This pertinent requirement, if done correctly, will maximise the impact of existing infrastructure and assets.

- **P4: Vision & Principles**

As highlighted in the Preface, we suggest use of the term 'Atlantic Economic Corridor (AEC)' in all instances as this is the term used in the NPF, other documents and initiatives. The emerging Atlantic Economic Corridor (AEC) initiative is supported through Project Ireland 2040. The AEC is a linear network from Kerry to Limerick, Clare and Galway, through the heart of this region to Mayo, Sligo and through to Donegal, the objective of which is to maximise infrastructure, talent and enterprise assets along the western seaboard to create economic hubs and clusters.

Section 2: Policy Context

- **P14: Regional Level Policy section (centre column P14) & ref to Shannon Town Plan**

Given that a new Masterplan for Shannon Town is being prepared by Clare County Council, it is essential that their work is integrated and referenced in the LSMATS given that the consultants drafting the plan have spent time examining the cycling/walking routes that already exist in Shannon and the potential to link the town, zone and airport through sustainable transport modes, using existing cycle and pathways.

- **P17: Shannon Town & Environs Local Area Plan (2012-2018)**

The Shannon Town and Environs LAP has recently been extended by Clare County Council to 2023.

Section 3: Study Area & Transport Context

- **P21: Current Transport Provision section (centre column, 4th para)**

Reference should also be made to private bus services that serve the Shannon area - for example there are services which use Bunratty for onward connection to Limerick/Cork/Galway/Dublin, etc. These are important indicators of potential demand for Shannon Town, Zone and airport bus services. Whilst it was pointed out at our meeting that private operators can apply for licences, Shannon Chamber would question why this is not happening given that services such as Dublin Coach does not commute into or via Shannon. Feedback received would point to a definitive interest by private operators to provide additional

services on routes, for example, from Sixmilebridge to Shannon and from Shannon Airport to main city locations. Perhaps further explanation is warranted as to what is required of private operators to make such routes commercially viable from a Transport Strategy perspective?

- **P21. Right column – 3rd para**

Potential routes for a spur rail link between Sixmilebridge and Shannon have been identified a number of years ago. A land preservation policy has been adopted in Shannon Local Area Development plans to facilitate implementation of a rail link at a future point. Shannon Chamber acknowledges the fact that a detailed modelling exercise was carried out by the NTA when examining the different modes of transport, including rail, and that the outcome of the modelling was that there simply would not be enough usage to justify the rail link; a reliable high-frequency bus transport was considered a better option for people commuting between Shannon and Limerick. We would, however, recommend that the concept of light rail linking Limerick, Shannon, Sixmilebridge and Galway warrants further examination as the trend, as outlined, in the Preface, is that this type of connectivity could become more beneficial in the future... given the requirement to reduce our carbon footprint, rail might be a faster and direct method of transport and a driver of rail spur development.

As a short-term proposal, a shuttle bus linking e.g. Sixmilebridge to Shannon might warrant consideration given that circa 40% of this 'village's' population (6,000 – 7,000) commute to Shannon on a daily basis between schools and work.

- **P22 (column 1, last para)**

As outlined at our Teams meeting, Shannon offers significant potential for cycling and walking using the existing network of off-road and riverside pathways and rural roads. These are used as informal networks by people in the town and the surrounding area. While current policy proposals seem to concentrate more on using the road network for cycling and pedestrian paths and, having listened to the 'safety' justifications for that and the fact that this Strategy's main aim is to reduce car dependency, Shannon Chamber members and local residents nevertheless believe that this is a 'missed opportunity'. Given the work that will be undertaken with the upcoming flood relief works in Shannon, we believe this presents an ideal opportunity for joined-up action. The infrastructure already exists and a low level of investment in mapping, signage and maintenance would generate a significant impact and sustainability return; increased usage of such resources would serve to embed the benefits accruing to cycling in mindsets and greatly assist in delivering the main objective of this Strategy – a reduction in car usage dependency.

Centre column, paras 3,4, 5

The text in these paragraphs is based on road network and footpaths only. As our Teams meeting will have shown, the abundant green areas in Shannon, which include a long-established network of "black paths" developed as the town was built, offer real potential for attractive and green walkways and cycleways.

- **P23 (centre column, para 2)**

The enhancement and management of the road network for the movement of strategic traffic could be addressed by reference to a 4th river crossing of the Shannon, as outlined during our Teams meeting. Accepting that this cannot be delivered in the short term, including it as a long-term project of strategic benefit to Shannon, Limerick, Foynes and the wider hinterland, would help to influence future direction and shape. For example, a river crossing from the northern shore of County Limerick to Shannon could create the potential for a significant city of scale and enhance the served market for Shannon Airport. This would also enhance Shannon Foynes Port and create the potential for an orbital route around the airport and the greater Limerick Shannon Metropolitan Area.

Right Column – Recent Improvements; Last bullet point

The development of the river walk in Shannon was a welcome development but involved about 2km of improvement and additions to a much longer and extensive pre-existing network of riverside pathways. Shannon Chamber would suggest that it is essential that the LSMATS pushes this to the next level to, as shown during our meeting, develop a link to Bunratty and onwards to Limerick as well as other parts of Clare. This is referenced later but the route between Bunratty and Shannon does not include the full existing network. It offers potential for both pedestrian and cycle use.

Section 6: Walking

- **P37: Centre Column – Shannon**

Consideration needs to be given to the fact that the 1970's Shannon Town Amenity Plan provided for 150,000 trees and 15 km of pathways through landscaped and green areas. This is existing infrastructure which can be updated, regenerated and further developed to provide the types of sustainable and people friendly walk and cycleways envisioned in the LSMATS for Shannon. Clare County Council has completed some upgrading in recent times, which is very welcome. The consultants tasked with drawing up the current Shannon Town Masterplan have walked these areas and have access to the 1970's plan and reference material. This fact that the infrastructure is in place provides an opportunity to extend the walkway to Bunratty along the riverside, using existing green and landscaped areas, not roads, and to extend further to Limerick along the riverbanks as set out in LSMATS. Shannon Chamber would welcome this being given consideration in the revised Strategy.

- **P38: Objective WK4 section ref to Shannon**

The looped walks mentioned here – Estuary Trail West; Sli na Mara Trail; Estuary Trail East; and Free Zone Estuary Trail - are based on hard pathways next to roads around the town. We believe that the opportunity has been missed to date to refocus walkways on the existing black path network that already exists and is extensively used in the town. The existing Shannon Walks’ signage does not include direction indicators, lacks a map or wayfinding and is focused on urban footpaths and roadways not greenways.

- **P39: Supporting Measures: Objective WK5 bullet point 1**

Why just Limerick? Shannon Chamber would recommend, as in the above paragraph, that a wayfinding system also needs to be developed for Shannon.

- **P41: Walkable Neighbourhood Limerick**

Shannon Chamber commends LCCC on the production of this excellent map and suggests that a similar map would be most beneficial for Shannon and could be easily produced by Clare County Council, using the existing river and green area walkways. This would link with the Shannon Estuary Way, of which Shannon is part, which is a loop of the Wild Atlantic Way and includes both Clare and Limerick. There are multiple options to map out 2 to 5-minute walk segments from Airport, Zone, Town and amenity areas of Shannon. The routes already exist. This is not an infrastructural but a branding and communications issue and something Shannon Chamber would be keen to see being delivered as a recommendation from the LSMATS.

Section 7: Cycling

- **P46: Column 1 last bullet point, section 1**

As stated already, the greenway network needs to be extended to include Bunratty to Shannon, using the banks of the River Shannon.

Centre Column; Shannon Cycle Network

Shannon Chamber agrees that Shannon has significant potential for cycling but the concept needs to be expanded beyond linkage to the road network. To encourage a greater uptake and appreciation of cycling as a leisure activity and as a mode of transport, the potential to expand on the quiet and green area cycleways in Shannon using the existing path network and riverside amenities, exists. Doing so would make it possible to cycle from Shannon Airport to Shannon Town and on to Bunratty on a riverside greenway with spurs to other locations such as the Shannon Free Zone along the way. This would be beneficial to residents, workers and visitors alike and serve to link the living, working and leisure aspects of Shannon.

- **P48: Long-Stay Cycle Parking (para 2)**

The provision of long-stay parking and cycle parking hubs would be equally beneficial to Shannon, Shannon Free Zone and Shannon Airport. The concept of a dockless bike system for Shannon, as referred to in our Teams meeting, would be a welcome development for Shannon. Shannon Chamber would very much support the delivery of such a piece of infrastructure.

- **P49 Map**

As referenced during our meeting, consideration should be given to continuing the cycle line along the riverside in Shannon and on to the airport, moving away from the road network to include green areas where there are existing pathways. There is also an opportunity to piggyback on the upcoming flood relief works. Shannon Chamber would recommend that this opportunity should not be missed.

Section 10: Roads and Streets

- **P70: First para, first column**

Shannon Chamber would suggest that the multiple access points to Shannon from the N18 serve to balance out the current traffic flow. The differing peak travel patterns translates into people accessing their workplaces using different routes in and out of Shannon depending on the time of day. Shannon Chamber would welcome more discussion on proposals in this regard and how they would best serve the 10,000+ people that (in pre-COVID times and hopefully in the future) travel in/out of Shannon daily for work.

Shannon Chamber welcome reference to the upgrade of the N19 and would recommend that this be upgraded from the single carriageway road layout and, that the current capacity constraints on the N19 junctions connecting Shannon Free Zone and the town be addressed.

- **P70: Regional Roads**

Shannon Chamber would welcome:

- the development of a signalised junction on the R471 at Smithstown and a new link road to connect the junction with the existing road at Smithstown.
- The upgrade of the junction of L3126 and Low Road as it approaches at Bunratty.

- **P76: Off-Street Parking; Last para, right column**

Shannon Chamber welcomes reference to a review of parking in Shannon Town being undertaken and the development of a Parking Management Strategy but suggests that this should include a review of the

Shannon Town Centre car parking. For example, the blocking of a previous access point at the Lidl roundabout had a big impact on traffic behaviour.

Section 12: Freight, Delivering and Servicing

- **P80: Rail-based freight**

Shannon Chamber would suggest that any review of rail freight should take into account work on the Western Railway rather than seeing Limerick to Foynes as a self-contained piece. The development of renewable energy (wind) along the Atlantic Economic Corridor will require interlinked and sustainable port and transport facilities; the Port of Foynes is a strategic part of this network.

Section 13: Supporting Measures

- **P84: Centre Column – Obj SM4 – last bullet point**

As mentioned already, when commenting on P39 of the LSMATS, any enhancement of wayfinding should also take account of the needs of Shannon and other key areas, not solely Limerick.

- **P85: School Travel Planning – first 2 lines, 2nd para**

Shannon Town, as a compact area, offers significant potential to test walk and cycle-to-school initiatives using quiet ways based on existing pathways.

- **P87: Autonomous Vehicles – right column**

As discussed at our Teams meeting, plans for the development of a publicly funded, private sector-led Future Mobility Campus in Shannon as a test bed for the development of autonomous vehicles, offers huge potential to test out many of the concepts in LSMATS. Shannon Chamber would welcome linkage and discussion on current opportunities offered by CAV technology and the challenges being faced in its progression vis a vis legislation.

Electric Scooters ...in this context and when referring to legislation, Shannon Chamber was delighted to hear that, while not currently a legal mode of transport, that reference to their being an acceptable and viable mode of transport will be included in the LSMATS. Shannon Chamber believes that this mode of transport will be especially suitable to Shannon and greatly assist in linking the various strands of the town – Town Centre, Shannon Free Zone and Shannon Airport and should be permitted for use on pedestrian bridges.

Summary of key points from Shannon Chamber

Walking (Section 6)

- Improve walkways in and around Shannon to allow for better accessibility between services in the town centre, the key employment hub of the Shannon Free Zone and Shannon Airport.
- The abundant green areas in Shannon, which include a long-established network of "black paths" developed as the town was built, offer real potential for attractive and green walkways and cycleways.
- Extend the walkway/cycle way from Limerick to Bunratty to Shannon using existing riverside infrastructure – using existing green and landscaped areas, not roads.
- Refocus walkways in Shannon on the existing black path network that already exists and is extensively linked to the town.
- Upgrade the existing Shannon walkways signage to include direction indicators – develop a wayfinding system for Shannon.
- An outcome from the LSMATS should include a recommendation that a walkable neighbourhood map be created for Shannon.
- Ensure that the pedestrian environment is significantly enhanced, more attractive and safer than at present, particularly around key visitor attractions such as King John's Castle.
- Enhance wayfinding in both Shannon and Limerick City Centre with a focus, in Limerick particularly, on ensuring ease of access to key tourist sites.

Cycling (Section 7)

- Designate a coherent network of cycle routes and cycle hubs across Shannon which will provide access to Shannon Airport, Shannon Free Zone and Shannon Town.
- Expand the Bicycle Sharing Scheme to Shannon.
- Development of cycling and walkway from Shannon to Bunratty /Sixmilebridge and following the riverbank to Limerick
- Shannon offers significant potential for cycling and walking using the existing network of off-road and riverside pathways and rural roads.
- Consider pilot testing walk and cycle-to-school initiatives in Shannon using quiet ways based on existing pathways.
- Create long-stay parking and cycle parking hubs in Shannon, Shannon Free Zone and Shannon Airport.
- Introduce a dockless bike system for Shannon.
- Extend the cycle line in Shannon to take in the riverside in Shannon and on to the airport; achievable through piggybacking on the upcoming flood relief works.

BusConnects (Section 8)

- Implement more direct inter-regional bus services between Shannon Airport and the second-tier cities of Galway and Cork.
- Assess how private operators can be licenced to operate on routes noted in our commentary on P3/4 (Section 3... comments related to P19) of this submission.
- Connect with Shannon to Limerick City Centre and other key locations such as UL and LIT via a fast frequent and reliable bus service.
- Develop Park and Ride in both directions – Shannon to Limerick and vice versa and to facilitate access to e.g. inter-city buses also.

Rail (Section 9)

- Shannon Chamber would recommend that the concept of light rail linking Limerick, Shannon, Sixmilebridge and Galway warrants further examination as the trend for this type of connectivity could become more beneficial in the future... given the requirement to reduce our carbon footprint; light rail might be a faster and direct method of transport and a driver of rail spur development.
- As a short-term proposal, a shuttle bus linking e.g. Sixmilebridge to Shannon might warrant consideration given that circa 40% of this 'village's' population (6,000 – 7,000) commute to Shannon on a daily basis between schools and work.
- Review rail freight taking into account work on the Western Railway. The development of renewable energy (wind) along the Atlantic Economic Corridor will require interlinked and sustainable port and transport facilities.

Roads & Streets (Section 10)

- Upgrade the N19 approach road to Shannon Airport from the current single carriageway road layout.
- Address capacity constraints on the N19 at junctions connecting to the Business Park and Town.
- Develop a new signalised junction on the R471 at Smithstown and a new link road to connect the junction with the existing road at Smithstown.
- Upgrade the junction of L3126 and Low Road (and its approaches) at Bunratty.
- Review Shannon Town Centre parking including rationale for blocking a previous access point at the Lidl roundabout and its negative impact on traffic behaviour.
- Advance the M20 project linking Limerick and Cork and the Limerick Northern Distributor Road.
- Consideration should also be given to a future upgrade of the Limerick to Kerry route to facilitate easier access to Limerick, Shannon Airport, Galway, and the west of Ireland.

Traffic Management (Section 11)

- Develop an integrated coach management scheme to support traffic management measures at key locations.

Freight, Delivery and Servicing (Section 12)

- Rather than limiting the size of HGVs accessing Limerick city centre, to be replaced by smaller vans with a higher environmental impact, Shannon Chamber suggests assessing the feasibility of developing a consolidation centre outside the city as a means of reducing the number of HGVs entering the city.
- Consider impact online shopping and the associated doubling of van delivering in the last 6 months alone. This is increasing carbon footprint, particularly in rural areas where distances required for each delivery are higher than in urban locations.

Supporting Measures (Section 13)

- Support the development of the Connected Autonomous Vehicle (CAV)/Mobility as a Service (MaaS) sector in the Shannon area including Unmanned Ariel Vehicle (UAV) R&D.
- Consider the likelihood of future unexpected occurrences which could further alter the pattern of living and working.
- Consider the benefits of a 4th River Shannon crossing for long-term delivery. Potential to deliver a significant city of scale and enhance the served market for Shannon Airport. enhance Shannon Foynes Port, and create the potential for an orbital route around the airport and the greater Limerick Shannon Metropolitan Area.

Housing – Impact on Transport

- The regeneration of cities and town will see an increase in the number of families and individuals opting for city-centre living. Consider the impact remote working on city-centre office accommodation and the potential to regenerate such buildings to living spaces. Regeneration needs people and people needs better cycling, walking and a fast and easily accessible mode of transport.
- Rural areas will also benefit from remote and hub working but will also require access to urban areas such as Shannon and Limerick city. This trend needs to be factored into the delivery of an all-encompassing Transport Strategy.

General Commentary

Given the level of change necessitated by COVID-19 and the growth in remote working, which is reducing worker commuting to major employment centres, it would be beneficial to factor this and any future such potential impacts on transport patterns into the drafting of the LSMATS, as this might further impact the way we live our lives.

We suggest that transport can be broken down into 5 main categories:

- Daily Commuter
- Delivery network
- Family shopping and discretionary journeys
- International travel/tourism
- Entertainment/Cultural/Sport events

For the commuter and most of the categories above, public transport is currently a poor substitute for the private vehicle when considering cost, convenience, efficient use of time especially in the morning, personal safety and availability to and from the outgoing final destination. People, particularly in non-urban centres, do not generally use public transport (unless they are travelling free) if they have any other alternative.

Unless there is a change in policy and practice, people will not transfer to public transport; interventions to change habits will take time but will be considered if the benefits are obvious and widely promoted. Could lessons be learnt from countries such as the Netherlands, where public transport is expensive yet a high percentage of the population already use it?

The view of Shannon Chamber and its membership is that, for public transport to work in Ireland, with a population so spread out, it has to operate like the courier, 'Hub and Spoke' model, with intercity high-speed transit time journeys connecting the cities, supported by local and frequent transport connections within each city and the surrounding areas, including park and ride locations on the periphery, as mentioned during our Teams meetings.

For this to be successful, the local transport network would need to be frequent, smaller, and environmentally friendly. The ideal solution for this type of local network could rest in some type of electrified autonomous trams or buses. The Netherlands, for example, utilises electrified buses powered by overhead power cables. In Antwerp, Belgium, the tram network is at surface level with as many stops as required where the only infrastructural requirement for a stop is a platform, with the last kilometre of the journey going underground at the city centre.

While not addressed in this LSMATS, we would question, is the current location of Limerick train station the most ideal location to sustain meaningful growth?

Our final suggestion is that the LSMATS should also consider the challenges facing Shannon Airport and position it to be best placed for potential future growth.

A Collaborative Undertaking

The Submission has been made possible by a series of contributions – phone call, emails, virtual meetings - between Shannon Chamber board of directors, Chamber membership, a meeting with the National Transport Authority as mentioned overleaf and, our involvement in the Transport and Mobility Forum involving key stakeholders in Limerick/Shannon.

The collective dialogue has enabled us to present commentary which, we believe, if taken on board, will foster a greater appreciation for and uptake of transport in all its forms in Shannon and the greater Limerick / Shannon Metropolitan Area.

ENDS

Submitted by:

Shannon Chamber, Suite 14, Shannon Airport House, Shannon, Co Clare V14 E370.
www.shannonchamber.ie / Tel: 475854 / email: hdownes@shannonchamber.ie

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