

A submission to the Limerick City & County Development Plan, on behalf of the Limerick Pedestrian Network

We need more ambition for a walkable city and county in our development plan.

This submission focuses on a number of key sections of the Plan, primarily within Ch6 Sustainable Mobility and Transport, and Ch10 Compact Development. We believe that the Plan would be strengthened by a more comprehensive treatment of pedestrian activity across many areas of the Plan. We have made a number of suggestions below which seek amendments to specific sections of the Plan.

Submission LPN 1: Chapter 6.3 Integration of Land Use and Transport Planning

Rural development will shift towards town centres and village hubs, centralising development and moving away from sprawl or ribbon development. The focus of pedestrian access in rural areas isn't just about getting to the bus stop - it's about connecting to our community. Within all our towns and villages we should invest in pedestrian access that covers and encourages active travel between the communities' main hubs - post office, medical centre, shops, park, sports ground, playground, school and retail, as well as the main concentration of homes. We would encourage an objective here from Limerick Council to set out a plan connecting rural community amenities and services with pedestrian infrastructure that meets DMURS standards. Our rural communities need to be attractive places to live, to shop, to work, to visit, and to spend time and explore. We need to get the basics of good pedestrian access right to ensure our villages and towns are accessible and encourage car free activities and travel.

It's great to see DMURS and other best practise guidelines referenced in the document and it's essential they are applied to new developments. When it comes to ensuring safe pedestrian access it's worth taking a proactive approach and getting out to audit our rural towns and villages, especially those that haven't seen development in some time. Does Boher have sufficient safe pedestrian access? Can people cross the busy N24 for the school bus? How do they walk from the church to the community centre safely? Is Shanagolden a wheelchair-friendly village? Can you safely cross from the shop to the post office? A retrofitting for pedestrian access is needed. Accessible footpaths are a very basic infrastructure that we are lacking in across our rural communities. We would encourage Limerick Council to develop a connected network of footpaths along local roads within the village and town boundaries, branching outwards. Pedestrian access isn't just about getting to the bus stop or going to work; it's about connecting to your community as well as accessing essential services. Until we address the issue of private car priority on rural roads, high speeds and lack of basic footpaths, we will fail to hit any targets for Limerick to increase active travel and decrease private transport emissions.

We request that an Objective be inserted in Ch6.3 TR P1 to state the following:

Submission LPN 1.1 A 1km radius around all towns in Limerick be made accessible for pedestrians through installation of appropriate infrastructure

Submission LPN 1.2 A reduction of speed limits on local and regional roads where space isn't available for pedestrian infrastructure and residents are sharing the road space with private vehicles in the zones on the outskirts, or approach to, the towns and villages.

We have grave concerns about the content following Chapter 6, Policy TR P1 - Integration of Land Use and Transport Policies. The Limerick Development Plan is underpinned by national policies such as the NPF, NDP, Climate Action Bill, Spatial Strategy, etc, as well as the declaration of a climate emergency by Limerick Council. The statement: "the draft plan will also facilitate improvements in road infrastructure to cater for these (car) movements" is a clear signal that transport development will continue to be focused exclusively on private cars for the entirety of the term of the development plan. This is in direct conflict with the stated transport policies, objectives and principles of all national frameworks and plans that the Limerick Development Plan is legally required to adhere to. We see no evidence that this section is guided by the requirement to reduce carbon emissions by 50% by 2030 and to be fully carbon neutral by 2050. The climate responsibilities that Limerick and it's people are facing are simply not reflected or acknowledged in this section and it must be remedied urgently.

Submission LPN 1.3 We would ask that this section is substantially reworked with a clear priority for public and active transport as the primary focus of rural transport development in Limerick.

Submission LPN 2: Chapter 6.5.2 Walking and Cycling

Objective TR 013 aspires to delivering modal shift towards sustainable modes of transport but is vague in how this will be achieved (no specific projects or approaches are mentioned in this section), while implying that the council will passively 'promote' and 'support' rather than actively 'deliver' and 'achieve'.

It is noted that while the plan identifies 8 separate road projects and assigns each project a dedicated objective (TR 1 – TR 08), there is not even a single walking or cycling project identified in the plan or assigned an objective.

Objective TR 013 Delivering Modal Split

It is an objective of the Council to:

- a) Promote a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities;
- b) Support investment in sustainable transport infrastructure that will make walking, cycling, carpool and public transport more attractive, appealing and accessible for all.

This objective can be strengthened to be more definitive in terms of the desired outcomes and more specific as to how the outcomes will be achieved. It is an objective of the council to **create compact and walkable neighbourhoods** in Limerick's urban areas in accordance with the spirit and principles of The National Transport Authority's [Permeability Best Practice Guide](#) and [The Design Manual for Urban Roads & Streets \(DMURS\)](#).

Such neighbourhoods will exhibit the following characteristics:

- the walking distance between home or origin & frequent destinations (e.g. shops, school) is shortened to such an extent that walking becomes the most practical and efficient means of moving around the neighbourhood
- pedestrians are placed at the top of the user hierarchy, followed by cyclists, then public transport, then private motor vehicles

Such neighbourhoods will be created by:

- the retrofitting of filtered permeability features in
 - opening new pedestrian links through walls and fences separating adjacent housing estates and separating homes from local services
 - eliminate 'rat runs' by installing permeable filters preventing through passage of motorised traffic while allowing walking and cycling movements to pass through
- Re-engineering road carriageways to reduce traffic speeds (e.g. introducing horizontal & vertical deflections)
- Enhancing the attractiveness and sociability of the neighbourhood by creating public spaces where people can rest, meet, or simply linger. (e.g. benches, trees and other planting)
- Take a multi-disciplinary design approach; and
- Securing community buy-in - ensuring that the affected communities are fully aware of the likely pros and cons, and investing sufficient time, energy and expertise in highlighting the positive elements, while allaying fears regarding perceived negative elements.

The creation of compact walkable neighbourhoods is important due to the many benefits it brings, including the following:

1. Children can walk / cycle / scoot safely and quickly to school
2. Regular walking improves health and wellbeing
3. Increased walking leads to increased opportunities for social interaction between neighbours and the development of enhanced community spirit and social capital
4. Local economic benefits arise in compact neighbourhoods by maintaining the viability and vibrancy of local, traditional neighbourhood centres or corner shops that people can walk to rather than driving to an out-of-town centre.

Submission LPN 2.1 We ask that the Plan will identify and complete at least 3 projects during the lifetime of its implementation, one in a town in Limerick County, one in Limerick City Centre / inner suburbs, and one in Limerick's outer suburbs

Submission LPN 2.2. We ask that these projects are measured and assessed fully, including before, during and after surveys of traffic volumes, modal split, air quality, and Pedestrian Route Directness (PRD).

Submission LPN 3: Chapter 6.4 - Policy TR P4

The Limerick Pedestrian Network welcomes the preamble contained within this policy section which focuses on bus connects, park and ride facilities and the development of a comprehensive walking and cycling network. However we are very concerned to see that none of these noble goals exist within the following objectives, all of which are roads projects that exclusively prioritise the movement of private cars. It is disappointing that the objectives listed directly conflict with the NPF, the NDP and the Regional Spatial and Economic Strategy for the Southern Region. All of these guiding documents require prioritising active modes and public transport above all other transport modes. We fear the policy decisions here will further fuel climate breakdown while acting against the public policy documents listed. By not having active, sustainable and public transport objectives listed we are seriously hampering any delivery of such within the Development Plan.

As Transport is both the largest polluter at 40% of all emissions and the quickest growing source of carbon it must be addressed as an essential part of the work to be undertaken during the term of the delivery plan. It is shocking that the current draft makes no reference to the imminent Climate Action Plan and Climate Budgets that will form the key guidelines to future transport developments over the term of the Development Plan. These omissions must be addressed and included in any further draft of the Development Plan.

Submission LPN 3.1 We would ask that Policy TR P4 would be redrafted to read:

It is a policy of the Council to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region with a focus on the the primacy of active, sustainable and public transport. We will be guided by our Climate Responsibilities as outlined in the Climate Action Plan, subsequent Climate Budgets and Limerick Council's formal declaration of a climate and biodiversity emergency as we move away from the private car and towards delivering active, sustainable and public transport networks as our primary goal.

Submission LPN 3.2 We would ask that the following objectives are added to this section. As the many national policies identified within this section strongly assert the primacy of active, sustainable and public modes we would insist that these are added before the existing car-focused objectives:

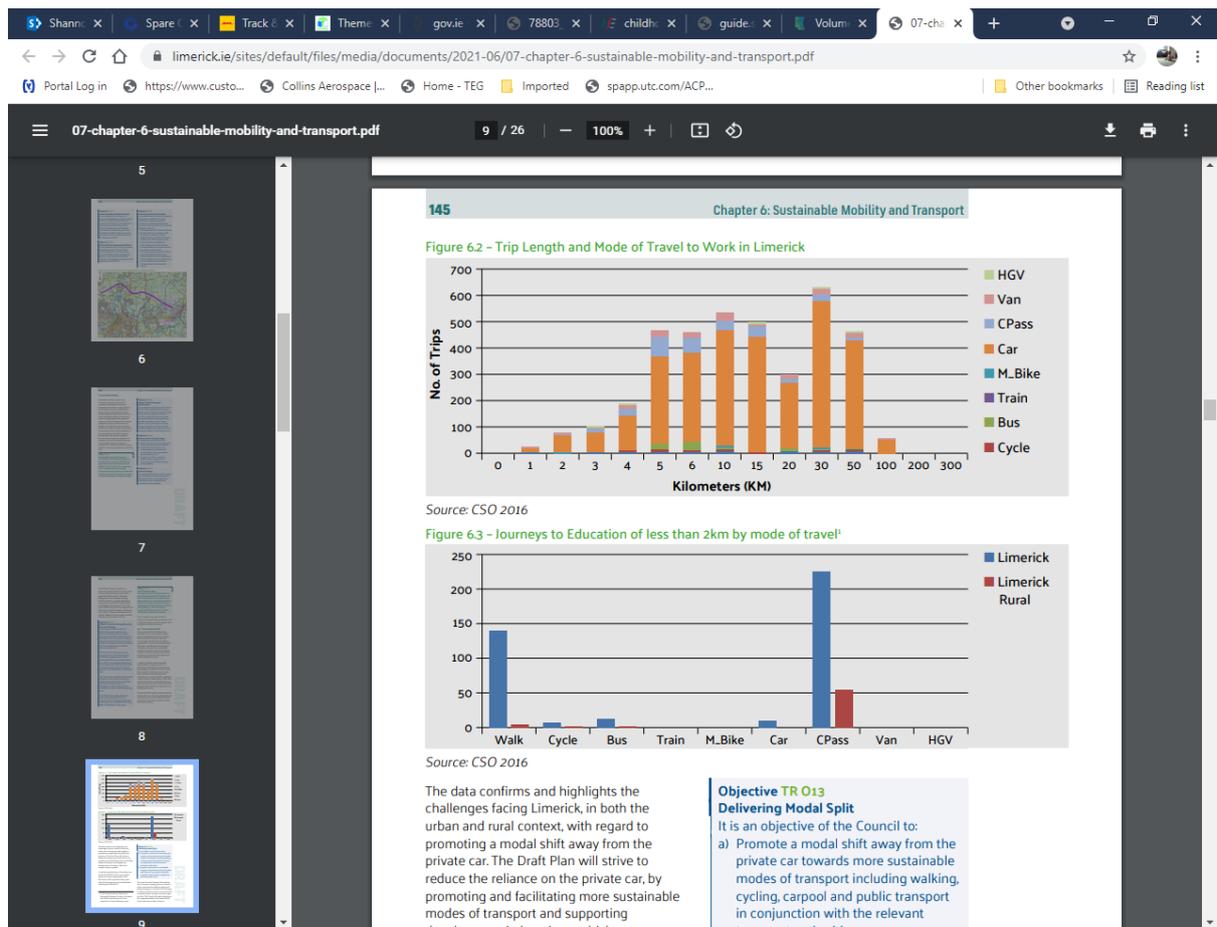
- Objective TR 01- Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area.
- Objective TR 02- Development of a Park and Ride programme for Limerick, linked with BusConnects Programme.
- Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area.

Submission LPN 4: Chapter 6.5.12 Promoting Active Travel (TR 030)

The growing problems of childhood obesity ⁽¹⁾ & respiratory illnesses ⁽²⁾ combined with the need to dramatically reduce transport emissions ⁽³⁾ call for urgent action by LCCC to deliver a significant modal shift in how children travel to and from school in Limerick City and County. To enable this, two key findings of the Childhood Obesity Surveillance Initiative Ireland 2019 must be addressed in the early phase of the Development Plan.

- Only 1 in 4 children travel to school on foot or by bike ⁽⁴⁾
- 75% of routes to schools are deemed unsafe ⁽⁵⁾

Parents choosing or needing to drive their children to school are a huge contributor to Limerick’s car dependence, traffic congestion & low modal share for active travel modes. In addition, school drop off and collection are a major cause of carbon emissions, poor air quality & noise pollution. Figure 6.3 from the Draft Development Plan 2022-2028 Ch 6 Sustainable Mobility and Transport shows this in stark fashion for journeys of less than 2 kilometres.



From Census 2016 ⁽⁶⁾, 85% of Limerick households own a car with 75% owning at least 2 cars. With the current level of car dependency for work noted in the Draft Development Plan 2022-2028 Ch 6.5.1 a clear target must be to identify the specific need for multiple cars per household and target delivery of active travel infrastructure to remove that need. This should include multi-stop / multi-school journeys, post-school trips to sports / leisure clubs and school trips where the journey continues to a place of work. This also complements the 10 minute city concept noted in Policy TRP5 of the Draft Development Plan.

Permeability - “where people can walk or cycle through areas safely and conveniently, and in a manner which confers a competitive advantage to these modes over... the private car” ⁽⁷⁾ Increased permeability is noted in the Draft Development Plan 6.5.2 as an objective in order to improve the modal share of walking and cycling with the effect of opening up safe passage for students and parents to travel easily to school. If this permeability was provided with the primary purpose of delivering school routes, it would have the knock-on effect of creating more connected communities. Improved public transport is another benefit of increased permeability as more people can access & use existing services in turn leading to additional services as demand increases. ⁽⁸⁾

The Limerick Pedestrian Network believes the delivery of the following recommendations should be included in the Development Plan and set against measurable goals with clear remedial action for any missed targets:

Submission LPN 4.1 The immediate implementation of safe areas around all schools in the city and county such as School Streets /School Zones. Schools and the infrastructure around them must be audited for safety and access, and active travel modes prioritised.

Submission LPN 4.2 Specific walking modal shift targets for each education sector. A baseline measurement in 2021/22 and clear targets and interventions for modal shift on an annual basis. A high bar needs to be set, and full support given to schools to manage what may be a complex (but crucial) transition.

Submission LPN 4.3 Safe, segregated footpaths and active travel corridors routes to all primary, secondary and further and higher educational institutions in city & county. To include increased permeability of residential neighbourhoods.

Submission LPN 4.4 Detailed survey of households with multiple car ownership to identify what specific infrastructure is required to allow reduced car dependency for school & associated trips

Submission LPN 4.5 Annual updating of the targets achieved and measures needed to address shortcomings with regular meetings including active travel advocacy groups and education stakeholders.

Submission LPN 5: Chapter 10 Compact Growth and Revitalisation

It is a stated ambition of the Plan to achieve compact growth, which “set(s) the foundations for a higher quality of life, through the promotion of mixed-use settlements, served by sustainable modes of transport and the creation of an attractive environment in which to live, work and do business.” There is an opportunity here to concretise this ambition in an Objective which would recognise the

importance of walkability in every aspect of compact growth. A mixed-use settlement is one in which people can move easily between working environments, leisure, and home. An attractive environment is one in which people are given the space, freedom, and safety to move around and congregate without the constant burden of car traffic.

Submission LPN 5.1 We urge the inclusion of a reference to walkability in Objective CGR O1 Place-making, Universal Design and Public Realm, to read: “It is an objective of the Council to: d) Ensure that all developments prioritise walkability in design, in order to create healthy, attractive, and accessible compact communities.”

Submission LPN 5.2 We would also like to make an overarching request that Limerick City and County Council commit within the Plan to becoming a signatory of the WALK21 [International Charter for Walking](#). This is a common policy reference that cities, organisations, neighbourhood groups and individuals can sign up to and encourage more everyday walking and greater walkability in communities.

Limerick Pedestrian Network

Submission prepared and submitted by the Committee

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External references

1. Department of Children and Youth Affairs. “Growing Up In Ireland: National Longitudinal Study of Children. Dublin; Government Publications, 2011”
2. The Lancet, April 2019. “Global, national, and urban burdens of paediatric asthma incidence attributable to ambient NO₂ pollution: estimates from global datasets”
3. Department of Communications, Climate Action & Environment: “Climate Action Plan 2019”
4. HSE: “The Childhood Obesity Surveillance Initiative (COSI) in the Republic of Ireland 2019” – Table 17
5. HSE: “The Childhood Obesity Surveillance Initiative (COSI) in the Republic of Ireland 2019” – Table 14
6. CSO: “Number of households with cars by small area – Census 2016” from <https://census2016.geohive.ie/>
7. National Transport Authority: “Permeability: Best Practice Guide” 2015. Introduction
8. National Transport Authority: “Permeability: Best Practice Guide” 2015. Section 1.2.2