

October 29th 2020

SUBMISSION from Clare Public Participation Network (PPN)
in respect of the Draft Limerick Shannon Metropolitan Area Transport Strategy 2040

About Clare PPN: Clare PPN is a network of 296 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three 'Colleges' which gather the member groups in terms of their interests and activities – these are environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision making structures and to serve as a support and information sharing network for the Community and Voluntary Sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat.

Clare PPN welcomes the opportunity to make the following submission in relation to the Draft Limerick Shannon Metropolitan Area Transport Strategy 2040:

Clare PPN are concerned that LSMATS 2040 will be incorporated into the forthcoming Clare County Development Plan and it is on this basis that we extend our critique. Clare PPN has concerns regarding climate change, social inclusion, rural development and public participation as regards this draft strategy.

1. LSMATS appears to significantly lack ambition in relation to taking the steps necessary for climate change mitigation and adaptation. For a strategy that plots out a course for a twenty-year duration Clare PPN is concerned at the very marginal increases cited in terms of cycling and pedestrian journeys and of the provisions being proposed in relation to them. We are concerned at the car –centric model being pursued. We do not feel that the strategy as presented meets the targets set in the current Programme for Government, the National Planning Framework or in the Climate Action Plan and we would like to see specific targets for emissions reductions included. We would like to see a reopening of the public consultation on this strategy on this basis. We do not feel that adoption of the current draft strategy serves the best interest of our members and communities.
2. We further note that very poor attention has been paid to rural transport options for those in the catchment areas and small towns which the strategy relates to. We consider this strategy is in danger of being out of date before it is agreed and we consider that the possibilities for remote work and study which have been increased exponentially by the Covid-19 pandemic are not factored into this 20 year

strategy and that there is a necessity to pause at this stage and revisit the consultation on that basis alone.

3. Given the climate and biodiversity emergencies we are living through, the inclusion of a number of expensive road projects is a poor use of land resources. The Northern Distributor Road will result in further urban sprawl and further car dependent lifestyles. At a time when town and village centres throughout the county are being hollowed out with high rates of vacancy, we need to enable, entice and incentivise people back to living in healthy, accessible urban centres, not invest in unsustainable developments.
4. LSMATS fails to include the necessity for a rail spur serviced by frequent commuter trains off the Limerick – Galway line to Shannon Town, Industrial Estate and Airport. The workforce in Shannon is considerable and such a spur should form part of the plans to transfer commuters from individual car journeys to sustainable public transport as well as being part of the support system for the proposed Shannon Estuary Greenway.
5. We have noted that the Draft LSMATS has weaknesses in a number of areas relating to social inclusion – these include gender proofing in particular where cycle ways/greenways and pedestrian facilities are concerned. There are significant issues and factors relating to gender that need to be addressed when seeking to change behaviour around single car journeys; these include safety and perception of safety and also the prevalence of ‘multi-purpose trips’ when car usage is examined by gender. (For example multi-purpose trips include when a person uses their cars on short trips to bring children to school – possibly different schools, continues to get groceries elsewhere, and then travel to work).
6. We are concerned too not to see a binding commitment to Universal Access being made in all aspects of the strategy and on behalf of our member groups we would have to criticise any strategy that does not include such a commitment. We noted that the NTA spokesperson who gave a presentation to Clare County Council’s Physical Development Strategic Policy Committee stated that Bus Connects would ‘hopefully’ be providing buses with universal access. In particular we would also like to see LSMATS detail how those involved in the public transport elements of their strategy will ensure social inclusion in transport infrastructure and facilities for those who experience mobility difficulties. For example our members have noted that they seek commitments to more accessible spaces on Trains so that disabled people can travel together in carriage if they choose- the suggest the possibility for carriages with seats which can be folded back to provide space for those who use mobility aids, wheelchairs and for those travelling with children in prams and pushchairs as well as the spaces currently available for all the above people. Our member groups also note that they wish to see a commitment to ensure that

changing places (spacious bathroom facilities equipped with hoists and changing stations for adults and children) are incorporated into all infrastructure developments including transport options. Such facilities determine whether certain journeys are possible for disabled people and those travelling with them.

7. Our members noted with particular relevance to Shannon that Shannon Town Roundabout is in urgent need of measures such as traffic calming, traffic lights or pedestrian crossings as it is currently extremely difficult for car drivers, pedestrians, wheelchair users and cyclists to get across the junction.
8. Clare PPN wished to see commitments in LSMATS regarding the allocation of space for footpaths and cycle lanes. It was noted by our members that when walking paths and cycle lanes are together that these should be safely delineated with walking paths in particular being designed with a view to two adults in wheelchairs being able to pass each other safely. Our members wished to see great efforts being made to ensure that estates and housing developments are walkable/cyclable and that where possible safe well lit public thoroughways are provided. In line with the UN General Assembly endorsement of 30kmh urban defaults, we would like to see a 30km/hr default speed limit applied to all built up areas to help reduce fatalities, injuries and to provide better conditions for those actively moving around their communities"
9. Clare PPN notes that there are huge opportunities for local flexible 'hop on hop off style' bus routes in the rural areas of this plan. Clare PPN considers that Busconnects should investigate these possibilities as in many countries mini-vans provide flexible safe and efficient services for areas with little population. Our members noted that these vehicles can be electric so as not to contribute further to emissions.
10. Clare PPN notes the current increase in electric powered micro transport options (scooters and electric bikes) and recommends that LSMATS take the increase in the usage of such methods into account in their plan in particular for urban areas where they are predicted to increase their market share considerably. ' We would like to see the potential for multi-modal trips being addressed in future transport modelling, identifying active travel - public transport connections to serve the people in the area - both in rural and urban centres.

Continues overleaf

With regard to public consultation Clare PPN has no certainty that the population in the areas of Clare to which this strategy applies are aware of the ongoing consultation. We note whilst there have been presentations at Strategic Policy Committees of Clare County Council we have not been party to or notified of any public events in Clare in relation to LSMATS. Whilst we understand that the Covid-19 restrictions have made public consultation difficult – they have not made it impossible. We feel that much better use of local media, radio, zoom meetings etc could have been made in order to ascertain the views of people living in Clare. At Clare PPN we are certain that transport policies will form a key part of our ability to reduce our carbon emissions – as part of a collective global effort upon which our whole society and way of life depends. We call on the NTA to approach this transport strategy with the seriousness, flexibility and ambition that it deserves.

As noted above we would like to see this current round of observations considered and a new draft strategy with detailed ambitious targets and built in review dates being put out for public consultation again. We would welcome the opportunity to participate in any such efforts.

Clare PPN works in a collaborative, consultative method and the points raised above reflect the views offered to us by our Environmental and Social Inclusion College members, our representatives who sit on Clare County Council's Strategic Policy Committees and Local Community Development Committee, our thanks also to Clare Leader Forum Members, Padraic Hayes, Martin Tobin and Dermot Hayes and Better Ennis member Sile Ginanne for their input to this submission.

We thank you for the opportunity to make this submission and we welcome any enquiries in regard to it.

Yours sincerely,
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