



Transport & Mobility Forum

RSES Submissions
Southern Regional Assembly
Assembly House, O'Connell Street
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Via online consultation portal

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Public Consultation – Response

Regional Spatial & Economic Strategy (RSES) for the Southern Region

&

Metropolitan Area Strategic Plan (MASP) for Limerick,

[RSES – Review | Southern Regional Assembly](#)

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the public consultation on the Regional Spatial & Economic Strategy (RSES) for the Southern Region & Metropolitan Area Strategic Plan (MASP) for Limerick.

The Transport and Mobility Forum, Limerick (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports measures and policies promoting sustainable and active travel. Sustainable and Active Travel (cycling and walking) helps to reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health, as well as the general quality of life in the city and county.

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As such it is the TMF's aim to support the UN's Sustainable Development Goals, in particular SDG 3 (Good Health and Well-Being), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).

Overview

Transport and Mobility Forum, Limerick (TMF) strongly supports the continued investment in **Public Transport and Active Travel Infrastructure**, as well as supporting the move away from road infrastructure designed primarily for private motor vehicles. We also support the provision of the necessary infrastructure to provide housing, services, employment, education, and other facilities within the urban core of our metropolitan region, as infill in the inner suburban areas, and at Public Transport & Active Travel hubs.

It is key where green or brown field development rather than small scale infill, takes place outside the urban core, that there are strong links **by both Public Transport and Active Travel** to the urban core and to surrounding communities. As well as ensuring that the development is of sufficient scale and density with appropriate permeability to allow **all everyday services and facilities to be within easy walking distance** of the entire population and for that population to be of a sufficient scale and density to support those services.

Investment in these **Public Transport routes, Active Travel links and Permeability**, as well as ensuring these higher densities can be supported is what is important to enable these developments to take place. Providing extra road capacity for motor vehicles is in most cases **not necessary** and not a priority and often counterproductive, reducing density, adversely affecting the permeability, and quality of life. No development should be reduced, discouraged or disallowed for lack of road capacity for motor vehicles rather **parking** provision in such developments **should be reduced or eliminated** to ensure that the amount of **motor traffic will not exceed the capacity of the existing road network**. No residential development for public sale or of multiple units, as distinct from one off development for farm families in rural areas etc., or commercial development, other than agricultural, quarrying, waste disposal etc. which by its nature must occur in a particular location or far from other development, should be permitted if would **require the use of a car** to live or work there.

The era of providing development land for residential or commercial purposes in large land banks off motorway junctions or in "out of town" locations has passed.

While there will always continue to be a need for new streets and local link roads, these should primarily be designed for public transport, active travel and as public realm which can act as a social space for the community. **We do not foresee the construction of major new roads or significant expansion of existing roads as a future priority**. Significant funding will be needed for the maintenance and renewal as well as the downsizing of our existing road network. There is a substantial existing under investment in the maintenance of our minor rural roads and city streets, which need to transition from spaces which feel like being spaces exclusively for motor vehicles to places where neighbours can stop to chat as they pass and children play.

The role of Limerick in rebalancing growth away from Dublin and the required investment to allow this

It is widely acknowledged that at present Ireland is over dependent on the Dublin metropolitan region with population, investment and economic output, and the transport system all over concentrated on the Dublin region. There is an urgent requirement to develop the other metropolitan regions at a rate that can act as a counterbalance to Dublin. Dublin also faces the issue that now existing low-density developments cover the vast majority of area within easy reach of the metropolitan core. While the other Irish metropolitan regions also suffer from the urban core being surrounded by a ring of existing low-density development their scale is such that it is possible to develop large areas at higher density within easy reach of their urban core in a manner that would not be possible at scale in Dublin.

Achieving this rebalance requires that infrastructure spending in the other metropolitan regions is greater on a per capita basis if not in absolute terms. This has not happened, the Project Ireland 2040 Capital Investment Tracker shows that Dublin received 79.3% of all investment in metropolitan regions.

According to the Housing Commission there was a housing deficit of approximately 250,000 homes in Ireland in 2022. The EU average is one home for every 1.85 people in Ireland the figure is one home for every 2.43 people, by far the highest in the EU. An addition 715,000 homes would be required to bring the Irish figure down to the EU average. The additional 250,000 homes proposed by the housing commission would reduce the Irish figure from 2.43 to 2.19 people per home to match the figure in the Netherlands, the second highest in the EU which is widely regarded in the Netherlands as constituting a serious housing crisis.

As there are a very substantial number of people who have been forced out of the metropolitan areas where their work, family, and personal ties are to commute long distances in to work, the housing deficit within the metropolitan areas is greater than the total in Ireland as a whole. While the vast majority of this deficit is in the Greater Dublin Area reflecting the concentration of population and economic opportunities there, the majority of the rest of the deficit exists within the other four metropolitan areas including Limerick particularly in the central city area, where the number of people wishing to live within walking distance of employment, and services in the urban core vastly exceeds the capacity of existing housing stock. This existing deficit of at least 10,000 housing units and the very significant additional annual housing production required to reach the growth targets which national plans require to achieve to rebalance growth away from Dublin requires a significant investment in infrastructure in Limerick.

Delivery of key Public Transport routes, Active Travel infrastructure as well as the water, power, etc to allow this development to happen is key to the future of Limerick and to the continued economic prosperity of the country as well as being required to mitigating the existing human tragedy that is homelessness.

To achieve all of this we need to see 5-10% of National investment spent in Limerick and adjacent Mid-Western areas.

Main points in bullets:

- Funding for Active travel & Public Transport ahead of roads
- Total funding for both Active travel & Public Transport should each be greater than that for road building.
- Focus on compact growth
 - Public money should be focused on providing housing, services, employment, education, and other facilities as close to each other as possible and existing urban cores rather than building roads or providing public transportation for long commutes.
- Coherent routes
 - Public transport
 - Metro area
 - Rural
 - Inter Nodal
 - “High frequency, high speed, affordable public transport links between all Irish metropolitan centres and regions not simply to and from Dublin.”
- Active travel
 - Metro area
 - National/Regional Greenways Network
 - “As part of a coherent, connected national greenway network”
- High quality, direct and car free active travel links to parallel public transport corridors particularly linking major developments to metro centres and public transport nodes.
- Key Towns
 - Must not include dormitory towns
 - Should aim to ensure key towns become self-contained rather than source or destination for long distance commuters
- Multimodal hubs
 - Must not be dominated by parking
 - Should aim to ensure the smooth transition between active travel and public transport

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- Encouraging growth in sustainable places
 - Ensuring housing and employment are built in close proximity to each other and where people want to live to reduce the number of people commuting long distances and by car.
- Using Growth to make places more sustainable
 - Providing housing in places with high demand being met by high levels of commuter inflow,
 - providing jobs in places with high levels of commuter outflow, and a coherent centre, increasing density & scale in places lacking critical mass to support local services
- Discouraging growth in the least sustainable, most car-dependent places.
- 15 min town, All services accessible by all car free, but not walkable by all
- 10 min communities, most services within walking distance of most
- 5 min neighbourhoods, Key services within walking distance of all
- Relevance for rural areas, Ensuring that key services, public a public transport node, and a number of other services are available within every rural community. All within an area that is walkable by some, cyclable by most, and accessible by all.
- Protection of truly rural communities from car dependency and long-distance commuting
- Infill, the use of infill development to increase the density of existing residential suburban and urban areas to achieve 5 min neighbourhoods where community services can be supported within walking distance must be the highest priority to be achieved by,
 - Brown field/ Group Infill
 - Small-scale infill
 - Back garden Infill
 - Accessory Residential Units
 - Single residential unit -> Multiple residential units on a single plot
 - Road narrowing
 - Repurposing street Parking into Additional residential units
 - Right-sizing inappropriate Green space to provide additional residential units
- Planning guidelines and density standards
 - Density, 10,000 resident/km² as critical urban minimum for 15 min neighbourhood
 - Parking, strict minimums, decoupling car parking from housing purchase/rent.
 - Permeability

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- Priority Recommendations

The Transport and Mobility Forum, Limerick recommends that the RSES and LS-MASP prioritise:

- Significantly increased investment in Public Transport and Active Travel infrastructure ahead of major road expansion projects.
- Delivery of BusConnects Limerick, including continuous bus priority measures, 24-hour routes, and integration with walking and cycling infrastructure.
- Development of compact, higher-density urban growth focused on existing urban centres, infill development, and locations well served by Public Transport and Active Travel.
- Delivery of a coherent, connected metropolitan and regional Active Travel network linking homes, schools, employment, healthcare, transport hubs and surrounding towns.
- Major investment in Mid-West commuter and intercity rail services, including improved high-frequency connections between regional cities and metropolitan centres.
- Reallocation of urban road space toward sustainable transport, public realm, safety, permeability and accessibility rather than increased private car capacity.
- Prioritisation of safe and inclusive mobility through lower traffic speeds, protected cycling infrastructure, safer junction design and improved accessibility for vulnerable road users.
- Stronger alignment between housing, transport and climate policy to reduce long-distance commuting and dependence on private car travel
- Increased Local Link services
- A commitment to fund a Transport & Mobility Forum in Limerick and each Metropolitan area and region.
To allow all stakeholders in transport, including providers, planners, regulators, and users better work together to achieve better synergies.
- Greenways to connecting Limerick to a coherent, connected national greenway network. Including connecting Limerick City to Rathkeale, West Limerick, and Kerry via the Great Southern trail, a lower Shannon Greenway connecting Limerick City to the Grand Canal Greenway at Shannon Harbour, Clonmel and the wider South East via the Suir Blueway,

Detailed Observations:

Coherent routes

Investment in public transports and active travel must prioritise providing a coherent network of interconnected routes rather than discontinuous sections or services.

Public transport services should be envisaged as a connected network enabling people to reach any destination from any origin rather than simply services moving people from residential areas to and from the nearest major employment centre.

Likewise local active travel infrastructure should be a coherent network focused on allowing movement both from outlying areas into public transport nodes and urban centers and also radially between different neighbourhoods. Greenways and interurban active travel routes need to be part of a coherent regional and national network, rather than discontinuous routes. Greenways need to be considered primarily as strategic active infrastructure rather than just places people drive to to exercise. Parking at Greenway access points should not be considered active travel infrastructure and should not be funded by active travel budgets. Short discontinuous greenway sections may offer recreational benefits but do not serve any significant function in terms of active travel. Priority should be given for greenways linking the existing greenways into a coherent regional and national network connecting all metropolitan areas with each other and the rural hinterland.

At present inter urban Public transport is dominated by services to and from Dublin there needs to be high frequency, high speed, affordable public transport links between all Irish metropolitan centres and regions not simply to and from Dublin

Including services

Cork<->Limerick<->Galway<->Sligo

Cork<->Waterford<->Rosslare

Waterford <->Limerick<->Galway<->Sligo

Cork<->Limerick<->Athlone

Key Towns

Care should be taken in selecting key towns in order to ensure that dormitory style commuter towns are not created or designated as key towns.

When selecting key towns the criteria of selection must ensure that the towns already possess a sufficient quality and quantity of retail activity, recreational opportunities, and general services provision as well as employment within their urban core. Such that it is lightly that a modest increase

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in population will allow these services and employment opportunities to hit a critical mass allowing people to live their lives within the town without long distance commuting from that town to a nearby metropolitan area. Likewise, settlements where there is a low level of resident working within the town and very high level of out commuting should not be designated key towns. This is particularly critical where towns exist in the existing commuter belt of metropolitan areas. While it is not a significant risk for towns which are remote from any metropolitan area and here the criteria for designating key towns should be significantly laxer.

Multimodal hubs

Multimodal hubs should be primarily aimed at facilitating the transfer between sustainable transport modes and secondarily about the transfer from private cars to sustainable transport modes. As such bike parking, bike sharing, micro mobility, and public transport provision are all higher priorities than car parking. Multimodal hubs must never be dominated by car parking including electrical car charging. Charging infrastructure must also include provision for e bikes as well as electric car charging.

Where significant amounts of car parking are required, car charging is required, it should be separated from the multimodal hub as the traffic generated will discourage its use by active travel. Bike parking, e bike charging, bike share stations and micromobility hubs should surround the public transport stop and be separated from any significant amount of car parking including e car charging.

Infill development

The key to transforming existing commuter and car dominated suburban areas into sustainable communities is infill housing development accompanied with the provision of local services and active travel infrastructure within these communities. These communities were built around the car at a density too low to support local services within walking distance and with poor permeability meaning even fewer people are within walking distance of any point than the already low density would indicate. To allow these communities to develop sustainably it requires an increase in permeability within the communities along with a substantial increase in the population density.

This can only be achieved by the construction of a large quantity of infill housing. This infill can be on large, small, or micro scale. On the large-scale any pockets of undeveloped land should be considered for high density housing. A density minimum and strict permeability standards should be required to ensure that a critical mass of population in order to support local services will be present. Smaller scale infill should also be considered. Housing estates and link roads should be audited to look for unused land, particularly over wide roads and parking areas, where additional housing can be accommodated. For example, overly wide estate roads which do not have housing facing onto the road could be narrowed and the role of housing added, extra-large turning circles could be reduced in size or eliminated allowing space for one or more houses.

The construction of additional units within existing residential plots should be strongly encouraged. This can take the form of additional units in the back garden, full size additional residential plots in larger gardens, or the demolition of an existing residential unit and the development of multiple units within an existing plot. In areas where the existing density is low and would benefit from an increase

in density there should be no maximum density and no requirement to provide parking, however there should be a minimum density requirement and strict limits on parking provision.

Planning guidelines and density standards

Where all every day journeys can be undertaken by foot, bike or public transport people will usually choose those modes, however if any regular weekly journey needs, or is perceived to need a car, most people into a position of forced car ownership and it is likely that car dependency will result from the required vehicle being used for the majority of journeys.

This means that in order to avoid car dependency all everyday services need to be within reach by walking cycling or public transport and this in turn requires that the population density within walking cycling distance or on the public transport route is sufficient to easily support those services. In turn requiring a sufficiently high gross density as well as a sufficiently permeable street layout to allow those destinations in theoretical walking or cycling distance to actually be reachable within those distances via accessible walking and cycling routes. It is therefore far more important to concentrate on the gross density within our communities rather than the net density within a development.

We recognize that it's impractical and undesirable to penalize, or to be perceived as penalizing development within communities which are at an existing low density by requiring far more ambitious and potentially cost design to maximize density within those developments, but guidelines must reflect that it is the gross community density that determines whether development is sustainable and walkable or car dependent and unsustainable.

Guidelines must put more emphasis on the permeability of developments and more particularly on how developments improve the permeability of communities. Density permeability and compactness are all equally important in ensuring the creation or maintenance of sustainable communities.

For this reason, the guidelines must include guidance on setting targets for either or both the number/availability facilities such as schools' shops employment and other destinations or the gross population within walking cycling distance or easily accessible by public transport.

Conversion between dwellings per hectare and population within walking distance.

The presence or absence of services and amenities within walking distance is dependent on there being a population capable of supporting these and services and amenities. Increasing the DPH not only allows more people to live closer to existing services and amenities, it also allows the presence of those services and amenities within communities which at a lower density would not be capable of supporting them.

This multiplication effect of density means that there is a critical density at which certain services can appear within communities, but in practice there is a single critical density where a critical mass of services can be supported within a community to allow people to form the habit of walking to most services locally rather than the habit of sitting into the car every time they leave the house, resulting in no services being present within the community. This density is in the region of 10,000 people per square kilometre given reasonably good permeability and good compactness within the community

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and assuming mixed use zoning allows the presence of such services and amenities within the community.

In order to convert the population required to support a given service or amenity into a minimum DPH which can support those services or amenities within a community it must be assumed that a maximum of 50% of the growth area within a community or within walking distance is residential allowing space for major roads and parks, schools, commercial uses and the presence of flood zones and other environmentally sensitive areas etc. and thus even with excellent permeability only 50% of the area theoretically within walking distance as measured by a circle on a map can actually be reached within that distance on foot given the road network thus the minimum DPH which is required to support a given service or amenity is approximately 4 times that is in reality approximately 4 times what would be required we're 100% residential coverage and reckoning walking distances by a circle on a map.

Existing guidelines dramatically underestimates the densities achievable with traditional Irish terraced housing, for example the industry street area in cork city has 74 substantial three bedroom terraced houses on 0.6 hectare, giving a DPH of approximately 125. While these late 19th early 20th century terraced houses do not meet modern building standards, building to three rather than two stories on the same footprint can easily achieve modern standards for space and separation if no front gardens or parking are included. As an extreme example Corporation building in Cork City achieve a DPH of 240 with own door terraced accommodation.

Consideration of local character and amenity should in the context of urban centres Include a minimum number of stories. The traditional vernacular building patterns for cities such as Cork Dublin Limerick or Waterford was for four to six story buildings lining city streets, with lower three story buildings on back lanes. One or two-story buildings, other than monumental buildings such as churches, theaters etc. were present only as insubstantial slum or shanty type dwellings.

There should be a presumption that urban building should be a minimum of three story within urban settlements and the minimum of five stories within an urban streetscape.

Car parking should not be allowed as part of residential developments except for disability access deliveries or to be sold separately only where demand ensures but the market price of the car parking space exceeds the gross costs including land and missed opportunity costs of building such parking.

It should not be possible to build any housing where the cost of providing parking is included in the cost of building, buying or renting the property, or where any part of the cost is passed on to residents who don't decide to separately purchase parking. Parking should only be available separately otherwise those who do not wish to drive are forced to subsidize the provision of parking for those who do. Where parking is allowed planning conditions should strictly ensure that the full cost of provision is recouped by the sale of parking spaces not by any additional cost to the sale or rental of residential units.

We support the reduction of and the introduction of greater flexibility in minimum separation distances in RSES guidelines. Excessive separation distances lower density, force people further apart

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and create car dependency. The emphasis should be on proper architectural measures to prevent poor privacy or shading rather than relying on excessive separation distances. In general, the guidelines should support Street widths of a similar scale to the adjoining building heights with the inclusion of narrower lanes for short distances between buildings.

Where an obligation on the project proposer to demonstrate that separation distances are sufficient not to negatively impact on the privacy or amenity of occupiers exists a similar obligation should exist to demonstrate that separation distances could not be further reduced without such negative impact in order to prevent the negative impacts of lower density and car dependency on the occupiers.

Given this we feel strongly that the minimum guideline should be substantially less than 16m. Late 19th and early 20th Century terraces in Cork are typically 7 meters between rear windows with a typical layout being a 7 meter Road width including footpaths 9 meter building depth and a 7 meter separation between rears. Examples include the Industry St. area Greenmount area, Hibernian Buildings and Bell's field/Old Youghal Rd. area examples in Limerick and Dundalk and Dun Laoghaire show even smaller separations as do workmen's cottages in Cork City such as Hogan's buildings and Madden's buildings which show a separation of under 4 meters. While a four-meter separation is clearly below what is desirable in a modern context the seven meter separation causes few problems in practice and we would suggest a minimum guideline of 10 meters as a more realistic figure.

BusConnects Limerick Delays

The Transport and Mobility Forum is concerned by the continued delays to the implementation of BusConnects Limerick. The redesigned network has the potential to significantly improve sustainable mobility across the metropolitan area through increased service frequency, improved coverage, orbital connectivity, and enhanced integration between residential areas, employment centres, healthcare, and education. However, recent indications that implementation may not commence fully until 2028 risk undermining confidence in sustainable transport delivery in the region.

The delays also highlight the need for the RSES and LS-MASP to place much greater emphasis on implementation mechanisms rather than high-level policy aspiration alone. Delivering BusConnects successfully will require:

- continuous bus priority infrastructure,
- allocation of road space to sustainable transport,
- depot and electrification investment,
- operational planning,
- driver recruitment and retention,
- and integration with active travel infrastructure and land-use planning.

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The TMF believes BusConnects Limerick should be recognised within the RSES and LS-MASP as critical regional infrastructure essential to achieving compact growth, reducing car dependency, improving accessibility, and meeting climate obligations. Interim measures should also be supported where possible, including phased implementation of bus priority, tactical interventions to improve reliability, and accelerated delivery of supporting walking and cycling infrastructure. Delays to sustainable transport investment should not result in increased reliance on private car travel or additional road expansion.

Safety, Accessibility and Vulnerable Road Users

The TMF believes that safety must become a central organising principle of transport and spatial planning within the RSES and LS-MASP. A transport system cannot be considered sustainable if large sections of the population do not feel safe walking, cycling, wheeling or accessing public transport.

Ireland's Road Safety Strategy 2021-2030 adopts the Safe System approach and Vision Zero objective of eliminating road deaths and serious injuries by 2050. The RSES and LS-MASP should strongly align with these principles by prioritising the safety of vulnerable road users, particularly pedestrians, cyclists, children, older people and disabled people.

Recent national data demonstrates the urgency of this issue. More than 1,300 cyclists were recorded as seriously injured on Irish roads between 2021 and 2025, while broader hospital admissions data suggests the true figure may be substantially higher. Fear of traffic danger remains one of the largest barriers preventing people from walking, cycling or allowing children to travel independently.

The TMF therefore supports:

- lower urban traffic speeds,
- protected cycling infrastructure,
- safer junction design,
- improved pedestrian crossings,
- reduced traffic dominance in residential areas,
- universal accessibility standards,
- and the reallocation of road space toward safer and more inclusive movement.

The design of streets and transport infrastructure should prioritise safety, accessibility and quality of life rather than maximising vehicle throughput. Creating environments where people feel safe travelling without a car is essential to achieving meaningful modal shift, reducing emissions, improving public health and supporting more liveable communities.

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Conclusion

We need to see substantially greater investment in Active Travel, Public Transport, and housing provision in Limerick and the Mid-Western Region to allow the region and nation to achieve it's potential. We do not believe that major new roads or road expansion has a significant role to play in enabling the region or nation achieve growth or quality of life improvements. Growth needs to happen within urban centres, and easily accessible following the paradigm of the 15-minute city/town. This is essential to drastically reduce commuting distances and car dependency in order to achieve carbon emissions reduction targets in the transport sector.

We would be obliged to further participate in the discourse and planning processes around this and other plans, schemes, and frameworks as we feel that TMF can provide valuable input into the process. Please do not hesitate to contact us at any time at tmflimerick@gmail.com.

Kind regards

Dr. Darren McAdam-O'Connell

On behalf of the Transport and Mobility Forum, Limerick

Note: *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

