



Transport & Mobility Forum

**Department of Public Expenditure,
Infrastructure, Public Service Reform and
Digitalisation**

Government Buildings,
Upper Merrion Street,
Dublin 2, D02 R583

Via online consultation portal

Transport and Mobility Forum, Cork
www.transportandmobilityforum.com
tmfcork@gmail.com

c/o The Environmental Forum
Bernadette Connolly
Mount Carmel, Kilcolman
Enniskeane, Co. Cork
P47 C578

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Public Consultation – Response

Consultation on the National Development Plan Review

[Consultation on the National Development Plan Review](#)

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the public consultation on the National Development Plan Review.

The Transport and Mobility Forum, Cork (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.

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).

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Overview

Transport and Mobility Forum, Cork (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 not necessary** and not a priority and in most cases is 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** set 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**.

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 Cork 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

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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.

The Cork Metropolitan Region is home to a greater population than all of the other Irish metropolitan regions outside Dublin with 11.3% of national population and already contributes between 19% and 27% of national GDP, depending on which figures are consulted. As its population and economy is very significantly larger than any or all other Irish metropolitan regions outside Dublin it is key to any rebalancing of growth away from Dublin. However, it does not receive its fair share of investment to allow this to happen, with €22,800 per capita spent in Dublin compared to €14,900 in Cork.

According to the Housing Commission there was a housing deficit of approximately 250,000 homes in Ireland in 2022. 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 Cork metropolitan area particularly in the central city area, where the number of people wishing to live within walking distance of employment, services and particularly third level education in the urban core vastly exceeds the capacity of existing housing stock. This existing deficit of at least 50,000 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, and large-scale apartment building in Cork. Primarily in the dockland's region, as infill in the inner suburban areas, along the rail lines, and the proposed LUAS line.

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 Cork 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 20-25% of National investment spent in Cork.

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Detailed Observations:

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.
- 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.
- Ensuring water, power, etc. do not limit or delay high density development in metro centres and transport nodes
- 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.
 - Where large-scale transport oriented developments provide only public transport access between housing and an employment centre, a large number of people will use that public transport link to access employment. However, most other types of journeys and destinations still require, or be more convenient by car leading to high levels of car dependency. By providing a public transport **network** in parallel to high quality **active travel links** and the high density, capable of supporting a diverse range services within the residential community, all regular daily and weekly journeys can easily and efficiently be achieved without the use of a car preventing the development of car dependency.
- A coherent, connected national greenway network
- High frequency, high speed, affordable public transport links between all Irish metropolitan centres and regions not simply to and from Dublin.
- Development targets to include current under provision of housing and infrastructure not just future growth.
- Clear and ambitious target for the reduction in the number of private motor vehicles registered and the distances driven. Number of ICE vehicles should decline significantly faster than the number of electric cars increases.
- An accelerated transition to 100% EV fleet in Public Transport, Freight and private cars.
- To focus EV infrastructure, promotion, and subsidies on freight vehicles, e-bikes, quadricycles, and those in isolated rural areas rather than e-car for those in urban, suburban or commuter areas.
- Commitment to funding for
 - Cork LUAS

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- Cork Area Commuter Rail
- Cork BusConnects, including bus lanes on all routes and 24h routes.
- Increased Local Link services
- A Transport & Mobility Forum in 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 including;
 - Cork City to Kinsale & Bantry,
 - Lee to Sea,
 - Cork City to Midleton,
 - Killarney to Dungarvan Via Mallow & Fermoy,
 - Youghal to Dungarvan via Cappoquin

Conclusion

We need to see substantially greater investment in Active Travel, Public Transport, and housing provision in the Cork 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 tmfcork@gmail.com.

Kind regards

Dr. Darren McAdam-O'Connell

Transport and Mobility Forum – Coordinator

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.*

**) A full list of partners in the Transport and Mobility Forum can be found at*

<https://transportandmobilityforum.com/partners/>

