



Transport & Mobility Forum

**National Strategic Planning
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*Via online consultation portal/
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Public Consultation – Response

Draft National Planning Statement on Planning Design Standards for Apartments, 2026

[Draft National Planning Statement on Planning Design Standards for Apartments, 2026](#)

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the public consultation on the Draft National Planning Statement on Planning Design Standards for Apartments.

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).

1 Overview

The TMF is very supportive of the update of these apartment standards to support greater urban densities. Minimizing the distances people need to travel to live their lives is the single most important intervention for decreasing the social, health, environmental, and financial cost of transport, as well as maximising the professional, educational, and social opportunities which come from being able to interact with a larger group of people. When urban areas are more compact and less sprawling people spend less time, money, and energy on travel while also having more fulfilling healthy lives.

Therefore, a central focus of these updated design standards must be maximizing the number of people who are within walking distance of each other and hence services, education and employment. This is achieved not only by simple density but also by ensuring our urban areas are highly permeable. How many people or how many services are within a given distance as the crow's flies is irrelevant to most people, what matters is, how many people are within 5 or 10 minutes walk, 15 minutes cycle, or are on the same local bus route. These metrics must be front and centre. Meaning we must make the most efficient use of space to provide quality accommodation while also decreasing the amount of detours that are required to move around our urban landscape.

2 Observations

Please find below a number of observations that we hope will contribute to further improve Draft National Planning Statement on Planning Design Standards for Apartments.

2.1 Section 2.3.1 Sustainable Mobility:

Permeability

A key consideration must always be ensuring that the greatest possible population/number of services/workplaces are within easy walking distance

This requires that large blocks are avoided and that pedestrian and cyclist movement through developments are facilitated on a 24 hour basis. The expectation is that you have a street network of blocks of less than a 100 m in length (500m absolute maximum circumference 300m target), rather than large sites with a single or limited number of entrances. Routes should be direct rather than circuitous. Guidelines must ensure that development improve the permeability of communities.

2.2 Section 3.1 Building Height and Layout

In order to achieve good urban density and a 15 minute city it is critical to the most efficient use of urban space is made. Historically buildings on Irish urban streets were 4 to 6 stories high. Apartments below this level should be strongly discouraged and any reduction below 6 stories should only be considered where there are particularly challenging or unique circumstances. With the expectation that all apartment blocks will achieve at least 6 habitable floors.

2.3 Section 3.4 Dual Aspect Ratios

Dual aspect departments and avoiding single aspect north facing apartments is highly desirable but it should not limit the supply or the possible viability of any apartment developments.

Guidelines should require that architects and developers maximize the opportunities for dual aspect and minimize, where possible, the number of apartments with a single northern aspect. It should not however allow planners to prevent the building of a development where this is not feasible or to significantly reduce the number of apartments to achieve this.

2.4 Sections 3.7 Internal Storage & 4.5 Bicycle Parking and Storage

A key factor, determining the future level of use and the level of benefit of active travel, is the location availability and convenience of bike parking.

The parking and longer-term storage of bikes must be considered together with Internal Storage provision as no one single type of bike parking meets every requirement. Except for the smallest of developments there must be a variety of different types of bike parking available to meet different needs.

Bikes may need to be parked short-term for 1 or 2 hours, by visitor, or by residents between errands. Such parking should be convenient and near the entrance and there is a lesser requirement for cover. However, overnight parking of bikes or perhaps over the weekend or during the week needs to be more sheltered, more secure, but does not have to be as conveniently located. And finally there is a need for some provision for longer term indoor storage of bikes, for example when residents go on holidays, when one sibling has grown out of a bike and the younger sibling is not ready, where a resident may not use their commuting bike during the summer or their cargo bike may not be as heavily used during the winter.

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Bike parking provision should also foresee the need for charging of e bikes, dedicated charging spaces for e-bikes are highly desirable and should be provided to prevent the inconvenience and risk of charging in apartments.

And finally, bike parking should not just accommodate adult standard bikes, residents parking needs to be able to accommodate

- Children's bikes
- Adult bikes
- Cargo bikes
- Bikes designed for carrying children
- Tandems
- Recumbent bikes
- And adapted bikes for those with physical disabilities.

2.5 Section 4.3 Communal Amenity Space

The provision of quality amenity and communal space is of critical importance for apartment dwellers. It's important that there is a mixture of diverse outdoor spaces in the vicinity of every apartment. This may be within the footprint of after development or be public space in close proximity. It is also important that all space is used to the maximum efficiency. And any outdoor spaces have a dedicated use which they efficiently achieve. There needs to be a mix of social spaces, play spaces, active spaces and natural spaces. Generic open space and generic “green space” which does not have a social active or nature function should be avoided. For example, turning circles, access for motor vehicles where it has not absolutely required, narrow strips of grass alongside roadways too narrow to provide at least place for children to play.

In order to ensure the most efficient use of space and to increase the amount of amenity and communal space for residents, there should be an expectation that all rooftop spaces are full used to provide outdoor amenity space either as Communal Amenity Space or as private amenity space to penthouse apartments. There must be a requirement that exceptional circumstances are required to justify any limitations to residents’ access to roofs.

2.6 4.6 Car Parking

The construction of an apartment car parking space roughly costs as much and takes as much space as a single bed space. In general, each car parking space is replacing a bed space at

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equal cost. The cost of this provision of this often unused or underused car parking is born by the residents and society, In 3 distinct ways.

- First the increased cost of building apartments with parking included which inevitably increases the price of accommodation for all whether they have any desire to own a car or not.
- Secondly by reducing the housing supply.
- And thirdly by reducing density and acting as a pull factor, for driving within urban residential communities where such driving is highly anti-social and unhealthy, hence profoundly altering the nature and atmosphere of communities in a negative manner

The vast majority of existing accommodation in Ireland includes car parking. This constitutes an existing vast oversupply of residential parking in the country. The requirement and demand is for accommodation which does not include the cost and wasted space of parking. The existing housing stock is far more than sufficient to meet any future demand for accommodation with parking.

Whereas there is an extremely large unmet demand for housing in walkable compact communities by those who do not own a car and who at present are forced into long commutes and hence forced car ownership. Even if a demand existed for more accommodation with parking, apartment accommodation in the areas which are suitable for apartment construction, being those same areas where it is possible to easily live without a car, should very strongly prioritize those without access to a car.

There should be a strong assumption that all apartments should be built without car parking. Car parking should only be allowed in exceptional circumstances. Where it is allowed it should be sold separately to the apartments, with a planning condition specifying that the sales price must reflect the full cost of construction, development levies and foregone space, to ensure those purchasing or renting apartments are not subsidizing the parking of others. Rather where any parking other than loading bays or disabled parking the developers must be able to demonstrate that it will be sold at sufficient premium that it very significantly reduces the cost of providing a portion of the apartments such as social housing or cost rental.

3 Conclusion

What may appear to be minor details in apartments standards are of critical importance to ensuring that Ireland can develop a more sustainable transport system. We can only reduce the health, financial, and environmental impact of transport by embracing more compact development of a nature which supports our transition away from private motor vehicles to active travel and public



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transport. This is a far greater importance to how people travel than major transport investments. We see these updated guidelines as an important and positive step in this process.

We would be obliged to further participate in the discourse and planning processes around planning and development guidelines 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

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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/>*