



Transport & Mobility Forum

Cork County Council

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Via online consultation portal

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Public Consultation – Response

Cork County Development Plan 2022-2028 Variation No.1 NPF Implementation

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the Proposed variation The Transport and Mobility Forum, Cork (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel *.

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

We strongly support these efforts to increase housing supply as we indicated in our submission on the county development plan there is an urgent need to rapidly construct significant additional housing to accommodate an increasing population. It is a strategic imperative that this housing is built-in the correct locations where people are within walking distance of work, education, services or a basic services and public transport node served by a high quality high frequency services, rather than in car-dependent isolated areas.

The TMF strongly supports measures that reduce the health, social, economic, and environmental costs of transport. The rapid transition to more efficient transportation is of vital importance to the nation and requires us to act rapidly. The best, easiest, and most effective way to achieve this is to reduce the distance needed to reach everyday destinations by appropriate spatial planning.

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

Parking

All large-scale housing schemes should be built with the intention that everyone who lives there should be able to easily do so without requiring a car. All housing which is built where a car is not required should be built without the requiring the additional cost and space to provide parking. People purchasing housing should not be required to purchase a car parking space, whether or not they require it, any parking allowed within residential developments must be sold separately and not included by default within the footprint of an individual residence.

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. Ideally ensuring to sale of parking subsidizes the cost of housing and in all cases ensuring the provision of parking is not subsidized by the sale of housing.

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 is 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.

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Density

In order to achieve the residential density required to support services within residential communities and to support a high frequency high quality public transport services it is necessary to achieve a density greater which is in most cases significantly greater than 50 units per hectare. This can be achieved by removing parking from individual units and providing only a small number of parking spaces for deliveries disabled parking and in some limited cases to be sold separately, And by building to a model of 3 story terrace housing rather than 2 story semi-detached housing this still allows substantial back gardens And own front door single family housing while achieving a density of up to a 150 units per hectare. Existing guidance 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 (they comfortably exceed existing standards for floor area), 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 buildings in Cork City achieve a DPH of 240 with own door terraced accommodation.

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 kilometer given reasonably good permeability and good compactness within the community 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

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what would be required we're 100% residential coverage and reckoning walking distances by a circle on a map.

No development should occur in car dependent settlements lacking scale to support local services or public transport

We are concerned at further residential development in smaller settlements outside the metropolitan area in the greater cork ring which do not have sufficient scale to support local services or regular high quality public transport and are already overwhelmingly car-dependent further housing should not be built-in these areas.

We do not in general support any development within the Greater Cork ring outside the larger key towns which have the scale to support local services, employment, and education as well as regular high frequency public transport services. Development outside these key large towns within the Greater Cork ring are inevitably entirely car-dependent and do not constitute good planning. We would very strongly urge no development other than one-off houses for local farming needs etc within this area. Certainly, no development of estate type housing within the smaller villages on towns in this area.

The units lost by not zoning any land in these areas should be made up for by increasing the DPH on land zoned within the metropolitan area and key towns close to town centers and public transport nodes.

Infill development

We would also like to see a greater focus on infill development within existing residential areas, particularly within the metropolitan area. This can consist both of

1. Additional units built within the existing footprint of single-family homes in housing estates. For example, an additional unit in the back garden or demolishing a single unit to build 2 or more units on the same existing plot.
2. As well as utilizing underused areas within existing housing estates. Such as excessive parking areas and turning circles, small patches of grass which do not provide any green space amenities such as recreation, socialization, or nature preservation, long stretches of excessively wide access roads which could be narrowed in order to build an additional row of new housing.

The construction of in fill housing has the dual benefits of increasing the density in the existing residential footprint in order to support services on high frequency high quality public transport as well as utilizing existing service infrastructure such as water and sewage which is often underutilized due to the reduction in occupancy in existing residential developments.

Observations

Strong support for variations zoning of land for housing in within walking distance of larger population centres and public transport nodes

We very strongly support the following variations

FY-VAR-01

FY-VAR-02

FY-VAR-03

FY-VAR-05

FY-VAR-06

FY-VAR-07 (Pedestrian & Cycle but not motor vehicle access should be provided to the north)

FY-VAR-08

FY-VAR-09

FY-VAR-010

FY-VAR-013

FY-VAR-014

MH-VAR-01

MH-VAR-02

MH-VAR-06

MH-VAR-07

NK-VAR-01

KK-VAR-01

MW-VAR-01

MW-VAR-02

MW-VAR-03

MW-VAR-04

MW-VAR-06

MW-VAR-07

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MW-VAR-08

MW-VAR-09

MW-VAR-11

CV-VAR-02

CV-VAR-03

CV-VAR-04

CV-VAR-05

CH-VAR-01

CH-VAR-04

MD-VAR-02

MD-VAR-03

MD-VAR-04

MD-VAR-05

MD-VAR-06

MD-VAR-07

MD-VAR-10

MD-VAR-11

MD-VAR-12

MD-VAR-14

YL-VAR-01

YL-VAR-02

YL-VAR-03

as they increase the supply of zoned land for housing in areas which are within walking distance of significant population centers and their associated employment, education, and services, as well as being well served by regular public transport services. These sites allow the residents to easily live without requiring a car and should be built minimal parking, to both deduce building cost and increase density. As these are highly desirable sites within easy walking distance of significant town centers they should be built at a high, rather than medium, density, therefore we would strongly urge that in the majority of cases that these zonings be changed from medium residential to high density residential.

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Strong opposition to variations removing residential zoning from highly suitable lands close to the center of significant towns

We very strongly oppose the following variations

FY-VAR-08

FY-VAR-09

FY-VAR-010

MH-VAR-04

MH-VAR-06

MH-VAR-07

CV-VAR-08

Similarly to our reasoning above these are highly suitable locations which should be prioritized for residential development the removal of a residential zoning to convenience a landowner goes against the intent of government policy in bringing in the residential zoned land tax. These are lands are among the most suitable for the development which society urgently requires. Removing the zoning in response to consultation with landowners in order to lower their tax bill is undermining that government policy, reducing the supply of housing, and will result in housing being built in less suitable locations which are more car dependant and less sustainable.

Strong opposition to variations increasing the provision of residentially zoned land in in highly car dependent settlements which do not have sufficient scale.

We very strongly oppose the following variations

Rathcormack

VAR-03-1.7-01

VAR-03-1.7-02

VAR-03-1.7-03

VAR-03-1.7-03

Castletownroche

VAR-03-1.10-01

Bartlemy

VAR-03-1.19-01

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Killavullen

VAR-03-1.21-01

Ballinhassig

VAR-04-1.10-01

Ballygarvan

VAR-04-1.11-01

VAR-04-1.11-02

Halfway

VAR-04-1.12-01

Carrignavar

VAR-04-2.9-01

VAR-04-2.9-02

Watergrasshill

WT-VAR-01

WT-VAR-02

Whitechurch

VAR-04-2.16-01

Cloyne

CY-VAR-01

CY-VAR-02

CY-VAR-03

Castlemartyr

CM-VAR-01

CM-VAR-02

Killeagh

VAR-04-3.9-01

VAR-04-3.9-02

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Shanagarry/Garryvoe

VAR-04-3.19.01

which zone land as residential in smaller settlements which both

1. lack the scale to support a full range of services within the settlement or a regular high frequency public transport service
2. and are also at present highly car-dependent

This is poor planning as runs contrary to government policy by provide large quantities of housing in areas which are by the nature going to be highly car-dependent. The numbers of housing units which could have been provided on these sites should instead be provided by increasing the density in zoned land close to town centers and public transport nodes

We would be obliged to further participate in the discourse and planning processes around strategic planning and spatial planning 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

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/>