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Department of Transport, Leeson Lane, Dublin 2, D02 TR60.

28th March, 2025

Re: Public Consultation on the Department of Transport Statement of Strategy 2025 - 2028

To whom it may concern,

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, uniting, representing and supporting our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024-25.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our board and key stakeholders in Cork City and County. Cork Chamber is deeply committed to sustainability, embedding it within all our activities and initiatives.

Our members have identified a broad range of priorities relevant to the work of the Department of Transport, including infrastructural projects, climate and sustainability actions, and better connectivity to enhance our economic growth and competitiveness.

The vision and mission mapped out in the department's previous strategy are in line with Cork Chamber's own goals in terms of sustainability and connectivity. These are now more important than ever and we encourage the department to ensure that sustainability and climate actions are at the heart of the new strategy.

We welcome the opportunity to contribute to the public consultation on the Department of Transport Statement of Strategy 2025 to 2028.

Yours Sincerely,

Conor Healy CEO

We are Sade

#### Introduction

Cork Chamber welcomes the opportunity to contribute to the public consultation on the Department of Transport Statement of Strategy 2025 to 2028.

Transport remains a key priority for Cork Chamber. Engagement with our members and our board has informed our policy positions in this area.

Cork has been designated an EU mission city for climate neutrality to 2030. The transition to a more sustainable and climate-resilient city and region will lay the foundations for sustainable economic development and improved quality of life. Projects which prioritise sustainable modes of transport, including bus and cycle corridors and pedestrian access, are of the utmost importance in achieving these objectives.

Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024-25.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our board and key stakeholders in Cork City and County. Cork Chamber is deeply committed to sustainability, embedding it within all our activities and initiatives.

Furthermore, Cork Chamber engages frequently with external stakeholders through a number of forums which provides us with a rounded view of the opportunities and challenges in many areas.

Cork Chamber would encourage the Department of Transport to include an increased focus on engagement with the business community as part of its process going forward in shaping policies and utilising a wide range of expertise.

#### Vision and Mission

The vision and mission included in the existing Department of Transport Statement of Strategy align with many of Cork Chamber's own policies.

The existing vision is: 'The people and places of Ireland, sustainably connected with each other and the world', and the mission is 'To deliver an accessible, efficient, safe and sustainable transport system that supports communities, households and businesses'.

Cork Chamber supports both of these and particularly welcomes the inclusion of sustainability at the heart of the existing vision. Given the increasing importance of sustainability and climate action, it is essential to retain sustainability at the core of future transport strategies and it is worthwhile strengthening this commitment in the coming document.

With regards to the existing mission, we welcome the broad language to deliver accessible, efficient, safe and sustainable transport systems and hope the department retains this ambition going forward.

A functional transport system is essential both in terms of achieving our ambitions climate goals but also in terms of reaching our economic potential. This is the case in both our existing urban centres, which have a range of transport options and challenges, and outside these

urban hubs in rural areas and smaller towns and villages, which must not be left behind in the development of future strategies.

### Sustainability: Economy, Environment and Society

It is essential to ensure that our transport system is integrated, resilient and decarbonised in a manner that is environmentally, economically, and socially sustainable.

Cork has been designated an EU mission city for climate neutrality to 2030. The transition to a more sustainable and climate-resilient city and region will lay the foundations for sustainable economic development and improved quality of life.

Cork, its citizens, community groups and businesses already embody many of the qualities that define a sustainable city, yet funding and supports from central government will be needed to ensure that Cork can complete the transition to climate neutrality by 2030.

Accelerating the delivery of key infrastructure that will promote active and sustainable project, as well as sustainable regional growth, including Cork light rail, BusConnects and improved commuter rail, are all key to this.

Decarbonisation of the transport sector must be at the heart of the new strategy for the coming years.

Ireland's greenhouse gas emissions were 55 million tonnes of CO2 equivalent in 2023<sup>1</sup>. While this represented a decrease from 59 million tonnes in 2022, Ireland still had the second highest emissions of greenhouse gases per capita in the EU-27 in 2022 at 11.7 tonnes of CO2 equivalent.

Transport is by far the largest source of energy-related CO2 equivalent emissions in Ireland. In 2023, transport accounted for 34% of energy-related CO2 equivalent emissions in Ireland.<sup>2</sup> Tackling transport emissions is crucial for Ireland in achieving its climate goals and this can be done by encouraging private car users to embrace public transport. But, to do this, Ireland's public transport offering needs to be strengthened and developed and, importantly, it also must be decarbonised at a far quicker pace than is currently happening.

Cork Chamber welcomes Irish Rail's climate action plan, which aims to reduce its emissions by 51% by 2030.<sup>3</sup> This will be achieved by reducing reliance on diesel through alternative fuels, transitioning to an electric-powered fleet, and by reducing energy consumption in other areas, and will have a very positive impact on our emissions if it is achieved.

Similarly, Bus Éireann is aiming for a 51% reduction in CO2 emissions by 2030.4

If Ireland is to have any chance of achieving its targets in reducing carbon emissions, the new Department of Transport Strategy must support and accelerate these and other

<sup>&</sup>lt;sup>1</sup> https://www.cso.ie/en/releasesandpublications/ep/p-eii/environmentalindicatorsireland2024/

<sup>&</sup>lt;sup>2</sup> https://www.seai.ie/data-and-insights/seai-

 $<sup>\</sup>underline{statistics/co2\#:\sim:text=Transport\%20accounted\%20for\%2034\%25\%20of,aviation\%20or\%20international\ \%20maritime\%20transport.}$ 

<sup>&</sup>lt;sup>3</sup> https://www.irishrail.ie/en-ie/news/iarnrod-eireann-climate-action-plan

<sup>&</sup>lt;sup>4</sup> https://www.buseireann.ie/sustainability

decarbonisation projects through innovation, increased frequency, and better access for all road users.

And, while these decarbonisation projects are welcome, there simply must be a more radical move towards public transport use for those who can avail of it. In 2023, for example, Ireland's rail journeys per capita was 8.4. By contrast, Luxembourg, the highest in the EU, had 43.4 journeys per capita. Some 13 countries in the EU-27 boasted more journeys per capita than Ireland.<sup>5</sup>

Census 2022 reported that 52% of people drive to work, down from 58% in 2018, which is a positive trend, but overall sustainable travel use declined.

Promoting active and sustainable modes of travel will help to reduce car dependency and alleviate congestion in all areas.

There is already evidence that improved frequency on rail services can yield more passenger journeys and, thus, reduced car dependency. This is evident in Cork due to the improved commuter service, but also on the Dublin to Belfast rail service, which reported a 50% increase in passenger numbers since it became an hourly service in October 2024.<sup>6</sup>

This success story can be replicated elsewhere and can result in increased commuter confidence in the public transport network.

Cork Chamber would encourage the further use of park and ride systems in our towns and cities as a key measure as part of this strategy to encourage people to use lower carbon alternatives as part of their journeys.

Furthermore, significant investment in the road network, including key arteries like the M28, the N25, and the R624 Cobh Road, will be crucial in linking existing urban areas and enabling the further development of population centres.

Projects such as the upgrade of the R624 Cobh Road are also crucial for the development of the wider region and have impacts beyond the transport remit, but also in terms of the development of housing and industries.

The recent planning decision to refuse the relocation of a chemicals plant from the Cork city docks to Marino Point in Cobh due to improper road infrastructure on the R624 at Belvelly Bridge will have a knock-on effect on the development of housing in the Cork city docks.<sup>7</sup>

In addition, such a move will also slow down the relocation of the Port of Cork from Cork's city docklands to Ringaskiddy, a move which would free up space for compact city living in the docks and Tivoli areas of the city.

The development of this road, as well as the M28 and the N25, also further assists the development of the offshore renewables sector, enabling the development of Cork as a renewable energy hub, which will be crucial in reaching Ireland's climate goals.

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<sup>&</sup>lt;sup>5</sup> https://www.cso.ie/en/releasesandpublications/ep/peii/environmentalindicatorsireland2024/transport/

<sup>&</sup>lt;sup>6</sup> https://www.irishnews.com/news/northern-ireland/belfast-to-dublin-train-numbers-jump-50-since-introduction-of-hourly-services-LIBSFAPPKBAIHFTKNONSBJYPPU/

<sup>&</sup>lt;sup>7</sup> https://www.pleanala.ie/en-ie/case/312981

It is imperative that the department's strategy makes reference to the joined-up-thinking across departments to ensure such issues are identified and resolved where possible and ensures the quicker completion of such crucial projects.

# Connectivity

The existing strategy notes the importance of maintaining and developing our transport system to link households, communities and businesses, as well as ensuring Ireland's international connectivity.

Cork Chamber supports this goal.

In terms of international connectivity, Cork Chamber endorses the development of more frequent and better links to other nations. As an island, Ireland is dependent on regular access to and from these shores for tourism and trade.

In the first nine months of 2024, more than 31.8 million passengers passed through Ireland's main airports, an increase of 1.7 million on the same period in the previous year.

This is evidence of increased connectivity, but there are opportunities for further increases in this space.

In particular, Cork Chamber encourages further support for the development of Cork Airport and its aim to increase from the 3.1 million passengers that used the airport in 2024 to its targets of 5 million and beyond in the coming years.

Cork Airport is crucial for the southern region. Its masterplan must be fully resourced to enable Cork Airport to build connectivity with routes to more European capitals, particularly business destinations, alongside a Cork to Belfast connection to drive all-island trade.

A key aspect of this is ensuring there is better access to Cork Airport, both from Cork city and county, but also the wider Munster region. To achieve this, there must be a focus on renewed, enhanced and widened public transport options, including bus, rail and light rail.

There are also opportunities for the Department of Transport to embed structures to support the country's regional airports in its new strategy.

In addition to the importance of strengthening connectivity between our towns and cities, Cork Airport and the Port of Cork play vital roles in the Irish economy as international gateways. Enhancing Cork's regional and international connectivity is a key economic enabler for the southern region as a whole.

Cork Chamber and Cork Airport last year conducted a survey among our members, with businesses identifying stronger and more frequent links to European capitals as priorities. They also stressed the importance of connectivity to hubs like London, Amsterdam, Paris and Frankfurt.<sup>8</sup> These connections remain vital for our business sector and the new strategy must include reference to protecting and enhancing these.

<sup>&</sup>lt;sup>8</sup> https://www.corkchamber.ie/news-release/new-york-and-european-capital-cities-the-most-sought-after-routes-for-future-connectivity-for-corks/

Respondents also noted the importance of direct connectivity to Cork, with more than eightout-of-ten citing this as important for their business. This finding emphasises the importance of air and sea connections to multiple parts of the country.

# Safety, Security and Accessibility

The department notes the importance of safety, security and accessibility for all in our transport system policies and services. This includes road users, public transport users, pedestrians, cyclists, and air and sea travellers.

Previously, the department included an aim to make roads safer for all users. Sadly, in recent years, the trend of road deaths has worsened. In 2024, 174 lives were lost on Irish roads and this figure was 181 in 2023.

The Road Safety Authority is supporting Vision Zero, a worldwide commitment that aims for no road deaths or serious injuries on roads by 2050. Its strategy for 2021 to 2030 is the first step in achieving this in Ireland, and involves a multi-year strategy across all aspects of road safety, ranging from new and improved infrastructure and an increased role for technology in vehicles and in the enforcement of road traffic laws to help reduce the dangers faced by all road users.

Cork Chamber encourages the Department of Transport to heed this aim and to also make it central to the new strategy and reverse the concerning trend of road deaths and serious injuries on Irish roads.

Initiatives taken in the design of new roads, including multi-modal corridors with segregated spaces for pedestrians and cyclists, are welcome, and these need to be incorporated into all future designs to minimise the risks faced by all road users and to encourage people to consider sustainable modes of transport.

Awareness campaigns targeting all road users to think about their behaviour can also be of use, ensuring that dangerous or careless behaviours are reduced and eliminated, and that steps toward safety are prioritised.

Roads must also be upgraded for safety purposes where there has been a large population increase or there is zoned land ready for development like east Cork. It is crucial that roads like the R624 Cobh Road and N25 are upgraded for this reason to ensure the sustainable and continued development of these residential communities.

Accessibility is also crucial in ensuring our transport systems function for all users.

This is particularly acute in the cases of rail and bus users, and it is essential that agencies such as Irish Rail and Bus Éireann continue to take steps to facilitate bus and rail users with additional needs.

This may include the use of ramps for access to older vehicles but also extends to refreshing the fleets of vehicles in use to ensure that newer, more accessible buses and trains are available.

Accessibility must also be taken into consideration when it comes to designing and locating new bus stops and train stations and refurbishing existing ones as many stations and stops still pose issues for users with additional needs.

# **Technology**

Advancements in technology present an exciting opportunity for all aspects of society, and increasing the focus on this space is an opportunity for the transport sector too.

A recent pilot initiative in Cork involved Bus Éireann fixing road safety cameras on two busy bus routes in the city centre. The trial was run by the National Transport Authority (NTA) and Bus Éireann.

The trial identified more than 8,000 separate infringements, including motorists driving illegally in dedicated bus lanes, impeding traffic flow by parking on double-yellow lines, or by stopping in yellow box junctions.<sup>9</sup>

This trial demonstrates how technology could be potentially used across our existing transport structures to identify issues, improve performance and, potentially, create a revenue stream through fines.

This is just one of a number of areas of opportunity in technology, and Cork Chamber would encourage the Department of Transport to examine other potential opportunities, such as smart AI traffic lights to improve traffic flow, electronic ticketing and contactless payments, and smart sensors to monitor traffic levels and improve real-time information.

#### **Recommendations:**

- Sustainability and decarbonisation must be at the heart of all of the Department of Transport's strategies and these processes need to be accelerated to ensure Ireland can achieve its climate goals.
- Accelerate the delivery of key infrastructure in public transport and active travel.
- Support larnród Éireann and Bus Éireann in their decarbonisation strategies.
- Facilitate the development of Ireland's airports and sea ports to enhance connectivity for trade and tourism.
- Prioritise safety for all road users and take steps to reduce road deaths.
- Focus on joined-up-thinking across departments to resolve issues quickly.
- Engage with the business sector to utilise a wide-range of expertise and insights.
- Explore the increased use of smart technology and AI to improve efficiencies in the transport sector.
- Prioritise the speed of delivery to deliver projects in a timely manner.

<sup>&</sup>lt;sup>9</sup> https://www.irishexaminer.com/news/munster/arid-41595784.html