Chambers Ireland
Advancing business together

Department of Transport Strategy Statement 2025-2028

Submission by Chambers Ireland

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Key Points

- It is vital the State's keystone urban transport infrastructure programmes – such as the Metrolink, the Cork Suburban Rail project and Dart extensions - are urgently accelerated.
- Investment in transport infrastructure improves quality of life, economic competitiveness and brings with it environmental benefits.
- The passenger cap at Dublin Airport harms our competitiveness and should be lifted.
- The current cap on night-time flights at Dublin Airport is harmful to the State's overall competitiveness.
- An Integrated Transport Hub should be developed at Dublin Airport to allow it to expand as a piece of critical State infrastructure and drive economic growth.
- Connecting our airports to the rail network aids trade, tourism, and encourages foreign direct investment.
- Improved rail connectivity is vital for Irish businesses and the economy.
- The Government should continuously work with the Northern Ireland Executive to expedite the implementation of the All-Ireland Strategic Rail Review's 32 strategic recommendations.
- Regular and reliable transport links to Northern Ireland are essential for businesses and tourism.
- Greater investment in our ports, complementary to our rail system, is essential considering their importance to the Irish economy in renewables, offshore and onshore energy, local economy and trade.
- It is essential the State develops a robust network of inter-urban and intra-urban public transport networks.
- BusConnects projects should be implemented in National Development Plan growth cities.
- Greater investment is required in shared cycling schemes and cycling infrastructure.
- Mobility hubs should be encouraged as they can stimulate local economies by creating jobs and encouraging investment in related industries.

About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

General

Transport infrastructure is vital to creating the resource-efficient, quality, densified urban living which is necessary for the creation of sustainable cities and communities, whether that be local active travel supporting infrastructure, nodal inter-urban high-volume connections, or inter-city high-speed options.

There should be greater and better investment in our transport infrastructure not only because of the quality-of-life benefits but also to improve economic competitiveness and benefit the environment[1]. Our member chambers share a unified vision of an Ireland where communities are transformed to be more person-centred, creating effective active transport infrastructure is essential to this goal. Our urban areas ideally should evolve to be active travel hubs, connected by efficient and affordable public transport links between these hubs. This is as true for smaller towns as it is for larger cities. Access to towns and cities should become less dependent on private vehicles like cars.

Creating train lines that can adequately serve the needs of the country based on the All-Ireland Strategic Rail review is essential. In addition, the delivery of keystone urban infrastructure transport projects should be urgently accelerated, such as Metrolink. Metrolink addresses the need for improved public transport infrastructure which is essential for maintaining both the city and the State's attractiveness as a business hub.

According to a report by Greenpeace in May 2023,[2] Dublin was ranked as having the worst public transport system among 30 European capital cities. This is jarring when we consider that the Dublin metropolitan area has the third largest GDP of metropolitan areas in the European Union. In addition, transport connectivity between the regions is a key priority for the Chamber Network. Chambers operating near the border have advocated for the benefits that would be

[1] Chambers-Ireland-submission-to-the-Department-of-Transport-on-the-National-Investment-Framework-for-Transport-in-Ireland.pdf

[2] https://greenpeace.at/uploads/2023/05/report-climate-and-public-transport-tickets-in-europe.pdf

derived from regular and reliable transport links to Northern Ireland. Businesses and tourism on both sides of the border are eager to ensure that such connections are as strong as possible.

Keystone Urban Infrastructure Transport Programmes

The State needs to urgently accelerate the delivery of keystone urban infrastructure transport programmes such as Metrolink, the Cork Suburban Rail project, and the Dart extension projects. All programmes represent the transformative infrastructure required to serve our growing population[3] will enhance connectivity, reduce travel times, support our economic growth.

As an example, Metrolink is vital not just for Dublin but the State as a whole. Firstly, it addresses the pressing need for improved public transport infrastructure in Dublin, which is essential for maintaining the city's attractiveness as a business hub. With 140,000 commuters travelling to Dublin for work, the current public transport system struggles to accommodate the workforce efficiently, leading to long journey times and reduced productivity.

Moreover, the project is expected to deliver substantial economic benefits, with Metrolink alone stimulating an estimated €13.7 billion in economic gains over 60 years[4]. This positive Benefit-to-Cost ratio highlights the project's potential to enhance economic activity.

Additionally, the development of all the aforementioned projects aligns with Ireland's Climate Action Plan, promoting sustainable transport solutions that can help businesses meet their environmental targets and improve their corporate social responsibility.

[3] Population Projections Results Population and Labour Force Projections 2017 - 2051 - Central Statistics Office

[4] gov.ie - Minister Ryan announces transformative MetroLink project

Rail infrastructure

All-Ireland Strategic Rail Review

The All-Ireland Strategic Rail Review represents a transformative vision for reshaping Ireland's rail infrastructure, enhancing connectivity, and promoting sustainable development. By implementing the 32 strategic recommendations outlined in the review, including additional track capacity, electrification, increased speeds, higher service frequencies, and new routes, the rail system will significantly improve. This enhanced connectivity is crucial for Irish businesses as it facilitates smoother and more efficient movement of goods and people across the island, thereby reducing transportation costs and improving supply chain reliability.

Effectively linking the regions is key to our competitiveness and connections to airports are a key determinant in attracting foreign direct investment and as such are important to our members. In particular, the northwest region urgently requires improved connectivity options and rail should be instrumental in driving that change. Equally, linking economic hubs such as Dublin and Shannon airports to the rail network will improve trade and tourism and provide businesses across Ireland with greater access to international markets.

Increasing rail usage

In terms of passenger transport more broadly, there are strong environmental, spatial and economic reasons to facilitate a modal shift towards rail from private vehicles like cars. If, on the urban infrastructure side, we succeed in making the shift towards active and public transport (which our cities and towns need) then, for the people living and working in urban areas, inter-urban transport needs will be the primary cause for retaining private vehicles.

Private vehicles involve large ongoing financial costs, so the owners are incentivised to maximise their use of their vehicles. This usage has enormous social, economic and environmental externality costs. Secondly there is the very large embodied-carbon, cost associated with each

new vehicle, particularly those that rely on heavy internal combustion engines or energy intensive battery storage.

Very often a new vehicle is only more carbon efficient than an existing vehicle if it is likely to see a very large amount of usage over its lifetime. An important metric of the success of the all-island rail network is if it can enable individuals living in urban areas to avoid using a car. Achieving this requires a comprehensive improvement of our rail system. At present it is very difficult for anyone to commute from any of the seven principal cities to another and return in the same day, unless the individual is using a car. This would be the bare minimum required to induce a substantial number of people in the principal cities to forego owning a car. For those based in regional growth-centre towns such a return trip is more difficult again, and we are a long way from enabling people in these locations to choose to forego owning a private vehicle.

For as long as door-to-door travel by public and active transport is slower, less frequent, and more costly at the margin than using a privately held vehicle then the primary mode of transport will continue to be the car. Fast, efficient, and frequent rail has a hugely important role to play in solving this problem. Overall, the All-Ireland Strategic Rail Review is necessary to modernise the transport infrastructure, support economic growth, and ensure Ireland remains competitive in a global market.

Port Infrastructure

Complementary to the development of our rail network, Chambers Ireland supports further investment in our ports. Our ports are of critical importance to the Irish economy in renewables, offshore and onshore energy, local economy and trade. They need major investment if they are to facilitate the generation of the 100s of GW of potential energy that lies off our coasts.

The importance of freight rail connections to seaports has historically been underweighted in the Irish transport system and the need to load containers onto trucks at our major ports inhibits the potential for our island to become a trading hub, poised as it is between Europe and the rest of the world (RoW), while also being in an ideal location for mixed loads of RoW->EU and RoW-

>GB destination goods to be landed and forwarded to their eventual destinations. We have significant deep-water resources that are underutilised which could help reduce congestion at EU and GB ports if large container ships can land here and have their cargo shipped onwards to secondary EU and GB rail-connected ports through Ireland/Northern Ireland distribution and logistics hubs that are themselves rail connected with ports.

Connectivity

Active transport

Sustainable transport infrastructure is vital to creating the resource-efficient, quality, densified urban living which is necessary for the creation of sustainable cities and communities, whether that be local active travel supporting infrastructure, nodal inter-urban high-volume connections, or inter-city high speed options.

The National Planning Framework (NPF) estimates a population increase of one million people in in the next twenty years. Where this population lives and works will be a key factor in how Ireland develops, socially and economically, and the NPF has set the objective of accommodating one quarter of the growth in Dublin, one quarter in the other four cities, and the remaining half in towns and rural areas[5].

The provision of appropriate transport infrastructure will play a crucial enabling role in the delivery of this objective and supporting quality of life for an increasing population. This will require significant additional investment in transport networks, particularly public and active transport networks. For this reason, Section 28 town planning guidelines should be introduced that require the inclusion of people-friendly infrastructure, segregated cycleways, and rest spots for mobility-impaired pedestrians. This will involve ensuring adequate resourcing local authorities

[5] Chambers Ireland welcomes the publication of the National Planning Framework Ireland 2040 and the National Development Plan | Chambers Ireland

to provide social and community spaces, such as parks and community centres, enhances the quality of urban life. Additionally, infrastructure that supports active transit by linking residential areas with civic and economic centres should be prioritised.

Upgrading urban, intra-urban and inter-urban transport networks

Our urban, intra-urban and inter-urban transport networks require significant upgrading so that public transport can be effective and active transport can become the primary mode of travel for our daily needs.

Densification of Ireland's five cities and other urban areas will place additional strain on transport networks which are already approaching capacity in many locations. For the NPF spatial goals to be delivered, it is therefore essential that urban congestion is tackled. This will mean increasing public transport capacity and usage and investing in active travel to discourage private car use as much as possible. Implementing BusConnects projects in National Development Plan growth cities and investing in shared cycling schemes and cycling infrastructure are essential steps toward achieving that goal.

Congestion carries significant costs with it and is a continual concern in many of our urban areas. Spatial and economic planning plays a significant role in the creation of movement and investment patterns and their associated energy, carbon, environmental and social impacts. It is essential that at every juncture compact dense development is supported by high-quality sustainable public transport corridors and services.

Effective spatial planning based on mixed-use developments and the connectivity via public or sustainable transport modes of residential, amenity and employment locations also has a major role to play in reducing traffic congestion and avoiding sprawl. Outside of the major cities, the vibrancy of towns must be supported as attractive places to live and work. This will mean ensuring reliable access to services and amenities, particularly for communities that are highly dependent on a small number of regionally important transport links. Given that transport in smaller towns largely does not face capacity constraints, a key focus will be meeting maintenance

requirements for existing infrastructure to provide a guaranteed level of connectivity to centres of scale. This must be supplemented by the targeted provision of new infrastructure and services where necessary.

When it comes to encouraging compact growth, it is important that there is a consistent and efficient public transport alternative to using private vehicles in key towns and regional growth centres. To make our urban areas attractive places to live and work, transport policy and the transport network need to address urban congestion and provide affordable, comprehensive, frequent and reliable public transport and active travel options. On the other hand, given that the viability of many public transport solutions is contingent on the population density of the areas served, the planning regime needs to successfully encourage urban development and densification and discourage sprawl. For urbanisation and the delivery of compact growth in our towns and cities to be successful, we need to have efficient, reliable and safe transport in our urban areas that is linked with the idea of transport-oriented future development.

Increasing Border Transport Links

Transport connectivity between the regions has been a key priority for chambers operating near the border and beyond, as all have advocated for the benefits that would be derived from regular and reliable transport links to the North. Businesses and tourism on both sides of the border depend on such connections.

Upgrading and maintaining key road and rail networks that connect business on either side of the border is essential. This includes projects like the A5 North-West transport corridor, which aims to enhance road connectivity. In addition, introducing increased frequency timetables in public transport across Ireland is critical to ensuring more use the system. As we have stated elsewhere in our submission, the All-Island Strategic Rail Review outlines strategic recommendations to enhance and expand the rail system, including additional track capacity, electrification, increased speeds, higher service frequencies, and new routes. These will need to be acted upon to truly create a connected island.

Decarbonisation and Mobility Hubs

The Chamber Network is united in its support for decarbonising public transport. There should be an active effort by the Department to stimulate further reductions in emissions and fostering a cleaner and greener transport.

Core to achieving this objective will be promoting sustainable fuel alternatives. There should be increased investment in biomethane vehicles and trains and buses should continue to be electrified. In addition, more investment is required in appropriate infrastructure to support the transition of Heavy Goods Vehicles (HGVs) to low-carbon fuel options like Bio-CNG. Furthermore, the use of Green Hydrogen-fuelled buses should be expanded across cities, towns, and intercity fleets.

Businesses can benefit significantly from the development of mobility hubs that integrate e-bikes, e-cargo bikes, e-scooters, and shared electric vehicles. Mobility hubs can attract more people to areas where businesses are located, increasing foot traffic and potential customers. This is particularly beneficial for retail and hospitality sectors.

E-cargo bikes and shared electric vehicles can provide efficient and eco-friendly delivery options for businesses. This can reduce delivery costs and improve service reliability, especially in congested urban areas. Businesses can save on transportation costs by using shared electric vehicles and e-cargo bikes for their logistics needs. These options are often cheaper to operate and maintain compared to traditional vehicles. Mobility hubs can offer employees convenient and sustainable transportation options for commuting. This can enhance employee satisfaction and reduce the need for expensive parking infrastructure.

The construction and operation of mobility hubs can stimulate the local economy by creating jobs and encouraging investment in related industries. There is the potential for businesses to collaborate with local authorities and other stakeholders to develop and promote mobility hubs. We should look at international best practices and see which aspects of shared mobility hubs which work there can be applied in Ireland. One of the cities which has a very effective shared

mobility hub system is Copenhagen which combines advanced technology with sustainable transport[6]. Barcelona's shared mobility hubs have been innovative in integrating AI with shared transport. AI projects in Barcelona recommend "green routes" to citizens who move around the city on foot or by bicycle, considering environmental quality and minimizing traffic time[7].

Aviation

The current cap on night-time flights at Dublin Airport is harmful to our overall competitiveness. Early morning flights between 6am and 8am are already the most popular slots of the day in Dublin Airport. The advantages of having flexible operations during this peak morning flight window is essential for the economy given Ireland's one-hour time difference behind continental Europe.

A replacement of the blunt instrument of a cap on night-time flights with a noise quota is desirable because if implemented as part of a wider effective policy, it would enhance Ireland's connectivity and competitiveness. The proposal to limit the number of movements to an annual average of 35 flights per night (11.30-07.00) could mean an average of between 41-42 per night during the summer and between 26 - 27 per night during winter or an average of c.99 per night during the 92- busy summer period and c.14 per night.

The introduction of noise quotas in addition to a further reduction in the number of night-time flights will harm what it was intended to enhance. The noise quota system is an industry-standard approach for managing aircraft noise at night at many international airports. This system will encourage the use of quieter aircraft at nighttime – reducing disruption to neighbouring communities and also reducing the need to avoid red-eye flights. We support this position as it would ensure that the overall effects of night noise at Dublin Airport are less than envisaged

[6] Copenhagen first in terms of actions on shared and zero-emission mobility - European Commission

[7] SmartHubs - CARNET Barcelona mobility hub solutions pilots

under the planning permission granted in 2007. This would avoid the need to reduce the capacity of morning and evening flight slots and safeguard the established connections that Dublin Airport has to European and international destinations – and ultimately protect our competitiveness.

A reduction in the number of night flights would see businesses losing the benefit of being able to return employees to Ireland in the same day as they travelled to another European country.[8] This risks reducing the number of business travellers considerably. Dublin Airport has an important role in connecting Ireland to the global economy and as a long-term and nationally central infrastructure business, it must be able to continue to deliver what is required to maintain and develop Ireland's connectivity in times of low demand, whilst ensuring it has the appropriate infrastructure and operating environment to both promote and accommodate higher volumes of traffic that support tourism, trade and the broader economy.

The passenger cap is not fit for purpose, harms our competitiveness and should be lifted. Planning conditions limits Dublin Airport to a maximum of 32 million passengers per year (MPPA)[9]. The problem is that surface access capacity constraints both in terms of the strategic road network surrounding the Airport Campus (M50 & M1) and the current Public Transport provision to and from the Airport limit the numbers of people who can use the airport. There is substantial expected growth expected, and the 32 million figure will soon reach 36 MMPA and 40MMPA by 2035.

For Dublin Airport to expand in advance of the delivery of Metrolink – there must be substantial investment in bus transport. Chambers Ireland are supportive of the development of an Integrated Transport Hub which can allow Dublin Airport to expand and ultimately drive economic growth. Metrolink is a key ingredient of the DAA's plan to grow passenger number at

[8] https://chambers.ie/wp-content/uploads/2025/03/Chambers-Ireland-submission-ABP-314485-22-Dec-2024.docx

[9] Airport 'baffled' as bid to raise passenger cap fails

Dublin airport to over 40 million per annum[10]. However, in order to meet increasing demand in the interim before Metrolink is operational – there must be expanded bus transport.

[10] daa Outlines Support For Metro To Dublin Airport