



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

10th July 2026

Senior Planner,
Planning Policy Unit,
Cork County Council,
Floor 13,
Cork County Hall,
Carrigrohane Road,
Cork,
T12R2NC.

**Re: Proposed Material Alterations of Proposed Variation No. 1 to the Cork
County Development Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to the proposed Variation No. 1 (proposed Variation) to the Cork County Development Plan 2022-2028 (Development Plan).

As Cork County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Response to the Submission on the Proposed Variation

The significant work undertaken by the Planning Authority to date is welcomed. The proposed material alterations substantially address the majority of the recommendations and observations raised by the Office in its submission on the proposed Variation at draft stage.

In particular, the preparation of a Settlement Capacity Audit (SCA), included in appendix 1 of the Chief Executive's (CE's) Report relating to the proposed Variation at draft stage is welcomed. This addresses Recommendation 1(i) and (iii), which sought the preparation of an SCA and information on the quantum of available residential land within the current Development Plan, extant planning permissions, and the capacity of available residential lands.

MA VAR-05-2.41-02-ALT, which removes one of the proposed residential sites in Glandore in response to Recommendation 3(ii), is also welcomed as it supports compact and sequential growth. By focusing development within more appropriate and better-serviced locations, the proposed Variation helps to consolidate existing settlement footprints, make more efficient use of infrastructure and services, and reduce the risk of dispersed or fragmented development. This approach aligns with national and regional planning objectives that promote sustainable settlement patterns.

The Planning Authority is further commended for its engagement with the Office of Public Works in addressing the flood risk management issues raised in Recommendation 4 of the Office's submission at draft stage. Regarding Recommendation 4(i), which required a review of whether stage 3 flood risk assessments were necessary for six areas, two areas have been omitted through proposed MA MW-VAR-05-ALT (Mallow) and MA KO-VAR-02-ALT (Killumney Ovens). It has also been determined that stage 3 assessments are not required at plan-making stage for the remaining four areas identified in Recommendation 4(i): Rathcormack VAR-03-1.7-04, Carrigaline CL-VAR-08, Newcestown VAR-05-1.20-01, and Bantry BT-VAR-01.

The response to Recommendation 4(ii) is also welcomed in proposed MA VAR-01-18-06-ALT, which removes Green Infrastructure (GI) and Agriculture (AG) zoning categories from the list of zonings where Developer-Led Infrastructure/Bridging Infrastructure and ESB Substations are identified as appropriate uses.

It is considered therefore that these responses fully address the issues raised by the Office under Recommendation 4 of its submission at draft stage.

In response to Recommendation 5(i), a proposed Residential zoning in Midleton is to be removed via proposed MA MD-VAR-14-ALT, as the site falls within the 40-metre buffer required for the N25 upgrade. The extent of two residential zonings is also proposed to be reduced through MA MD-VAR-01-ALT and MA MD-VAR-07-ALT to safeguard the scheme. In addition, proposed MA CL-VAR-09-ALT in Carrigaline addresses Recommendation 5(iii) by reducing the site area to avoid overlap with the M28 road project reservation and by introducing supporting text to the relevant objective. All of these measures are welcomed.

The Office notes that the Planning Authority engaged with the Cork National Roads Design Office in relation to Recommendation 5 of its submission at draft stage. The Office also notes the chief executive's response in relation to ensuring that the proposed zoning under MW-VAR-08 does not conflict with the emerging preferred route for the N72/73 Mallow Relief Road Project, and notes in relation to MW-VAR-10 that while there is an overlap with the scheme, the Planning Authority identifies this as minor and the proposed Green Infrastructure zoning of that site will not facilitate development that could conflict with the road. However, noting the Transport Infrastructure Ireland submission, and given the design stage of the scheme, an additional level of protection is advised in relation to both MA MW-VAR-08-ALT and MA MW-VAR-10-ALT. This matter is dealt with under Observation 2 below.

In relation to the coalescence, or potential coalescence, of Midleton and Carrigtwohill, the Planning Authority's response to Recommendation 2 of its submission at draft stage, set out in the CE's Report and its section 58(12) notice, is noted. The reference to existing policy provisions, including Development Plan Objective RP 5-12 (Purpose of Greenbelt) and Objective GI 14-16 (Prominent and Strategic Metropolitan Greenbelt and the associated map), as safeguards against future coalescence is acknowledged. Notwithstanding these provisions, it is

suggested that the next Development Plan review process should consider at this issue in terms of the specific urban areas involved, examining the role of green buffers and landscape features, and measures to preserve the distinct character, heritage and sense of place of each settlement, while accommodating sustainable growth and supporting local services and infrastructure.

Notwithstanding some positive progress, the Office recommends a number of modifications to further strengthen alignment with national and regional policy, support integrated infrastructure planning, and promote compact and sustainable growth. In this regard, the Planning Authority should update the SCA tables to reflect any new residential zonings introduced through the material alteration process. The Office also considers that proposed MA MW-VAR-08-ALT and MA MW-VAR-10-ALT at Mallow, which introduce text relating to the N/M20 Cork to Limerick Project, should be further updated to include reference to the N72/N73 Mallow Relief Road projects.

2. Overview of submission on proposed material alterations

The Office has no recommendations in respect of the material alterations to the proposed Variation.

The observations set out below are intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Implementation of the housing growth requirements	-	MA Observation 1
National road network	-	MA Observation 2

3. Implementation of housing growth requirements

Section 2.4 of the NPF Implementation: Housing Growth Requirements (2025) requires that planning authorities should undertake an SCA to identify zoned serviced/serviceable lands with residential development potential.

While the Office acknowledges that a detailed SCA has been prepared and included as appendix 1 to the CE's Report, the Planning Authority is advised to ensure that

the SCA is updated to reflect the proposed zonings to be omitted by way of the proposed material alterations and the new proposed residential zonings arising from the proposed material alterations included. The Office therefore advises that the Planning Authority updates the SCA to reflect the zoning upon adoption of the proposed Variation.

MA Observation 1 - Implementation of the Housing Growth Guidelines - Settlement Capacity Audit

To ensure clarity within the core strategy, to support the co-ordinated and sustainable development of communities, and the implementation of the housing growth requirements, and having considered the following:

- the Development Plans, Guidelines for Planning Authorities (2022);
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objectives 1 and 2, and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 43 of the NPF to priorities the provision of new homes at locations that can support sustainable development; and
- NPOs 101, 102 and 103 of the NPF to consider the serviceability of land zoned for development,

the Planning Authority is advised to ensure that the Settlement Capacity Audit is updated to reflect the proposed zonings to be omitted by way of the proposed material alterations and the new proposed residential zonings arising from the proposed material alterations upon adoption of the Variation.

4. National road network

The Office welcomes the inclusion of new text relating to the proposed N/M20 Cork to Limerick project within MA MW-VAR-08-ALT and MA MW-VAR-10-ALT relating to Mallow. This is reflective of the Act which supports greater co-ordination across Planning Authority boundaries. However, the Planning Authority is advised to include

a modification to the proposed material alteration text to also refer to the N72/N73 Mallow Relief Road projects. The proposed text should be updated accordingly.

MA Observation 2 - National Road Network

Having regard to the need to maintain the carrying capacity and safety of the strategic road network, including improvement, upgrading of the existing network and new routes the Planning Authority is advised to:

- (i) include a modification to the new text of proposed MA MW-VAR-08-ALT to include reference to the N72/73 Mallow Relief Road Project, to read as follows

Any development will be required to integrate, and be compatible, with the final design of the N/M20 Cork to Limerick project and the N72/73 Mallow Relief Road projects;

and

- (ii) include a modification to the new text of proposed MA MW-VAR-10-ALT to include reference to the N72/73 Mallow Relief Road Project, to read as follows

Any development will be required to integrate, and be compatible, with the final design of the N/M20 Cork to Limerick project and the N72/73 Mallow Relief Road projects.

5. Summary

The Office requests that the Planning Authority addresses the observations set out above.

As part of this process, the CE's Report to the elected members, prepared under section 58(15) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National

Transport Authority during the plan preparation process within **one week** of adoption;

- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
