



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

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

**Re: Draft Cork County Development Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the draft Cork County Development Plan 2022-2028 (the draft Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000*, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

**4ú hUrlár, Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWW4.**

4th Floor, Park House, 191-193A North Circular Road, Dublin 7, D07 EWW4.

T +353 (0)1 553 0270 | E info@opr.ie | W www.opr.ie



Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

### **Overview**

The draft Plan is being prepared at a crucial time following the preparation of the *National Planning Framework* (NPF) and the Southern Regional Assembly Regional Spatial and Economic Strategy (RSES), which seek to promote the rebalancing of regional development in a sustainable manner. The draft Plan has proactively embraced many of the challenges and opportunities identified in the NPF and the RSES, which support the National Strategic Outcomes of the NPF through, among other things, the:

- setting out of an overall framework for the spatial development of the county which prioritises the development of the main towns and key villages in the Metropolitan Area consistent with the settlement framework of the RSES and the Cork MASP and with the National Strategic Objective for compact growth;
- refining of the existing land use zoning for the county to support the National Strategic Objective for compact growth;
- integration of the development growth strategy for the county with existing and/or proposed high quality public transport infrastructure and providing appropriate policy support for the promotion of active and sustainable transport modes and the implementation of the Cork Metropolitan Area Transport Strategy consistent with the National Strategic Objective for sustainable mobility;



- protection and improvement of environmental, heritage and amenities across the county consistent with the National Strategic Objective for enhanced amenities and heritage; and
- provision of a strategy for renewable energy in the county, based on environmental capacity through sieve analysis and having regard to the ambitions of the State for renewable energy development consistent with the National Strategic Objective for transition to sustainable energy.

In particular, the Office acknowledges and welcomes the work undertaken by the planning authority to include all land use zoning objectives in the county development plan, which is extensive for a county of this size. The Office commends the planning authority for facing this challenge and successfully completing the task within the time constraints of the plan drafting stage. This body of work will benefit all parties by providing certainty at the point of the adoption of the plan and will facilitate the efficient implementation of the plan including the delivery of planned housing and economic development.

However, there a number of areas which require significant work in order to more fully align the development framework for the county within the current national policy context. In particular, the population and housing targets in the draft plan depart quite significantly from those determined in accordance with the methodologies of the *National Planning Framework Implementation Roadmap* and the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)*. The over-estimation of required housing delivery beyond that guided by the Minister for Housing, Local Government and Heritage has important implications in terms of timely delivery of physical and social infrastructure in the right locations and the realisation of sustainable communities. It also risks requiring infrastructure beyond reasonable need, that will divert resources and take longer to deliver and at greater cost.

In addition, although the core strategy in Chapter 2 of the draft Plan provides detailed information for the county, this data is at a strategic spatial level only, based on the four Strategic Planning Areas of the county. The core strategy information for the



settlements is not included within the core strategy, but is appended to the draft Plan, with the details distributed between four separate tables, with details also included per settlement within Volumes 3 to 5. No single core strategy, compliant with the full requirements under section 10(2A) of the Act, has been included in the draft Plan.

Bearing in mind the statutory requirements and practical aspects mentioned above, it is therefore crucially important that the total quantum of zoning for residential uses is evidence-based and relates directly to potential housing yield. The issues surrounding future population growth and housing supply targets, while also taking account of housing yield on mixed use lands and on infill / brownfield yield (compact growth) and the tiered approach to zoning, do not provide sufficient justification for the quantum of land use zoning proposed under the draft Plan.

The Office welcomes the level of work that the planning authority has expended in developing a strategy for retail development, including working with Cork City Council to develop a Joint Retail Strategy (JRS) for the Metropolitan Area. However it will be important for the JRS to consider the entirety of Cork County, not just the Metropolitan Area and, having regard to Minister's letter under section 9.7 of the Act to consider, in particular, the implications of retail developments contemplated in the draft Plan such as outlet centres in order to develop an overall agreed retail strategy for Cork as a whole.

The Office is aware that many planning authorities are experiencing difficulty in implementing the requirements of the *Planning System and Flood Risk Management, Guidelines for Planning Authorities* (DECLG and DECHLG, 2009) through the plan preparation process. The Strategic Flood Risk Assessment attached to the draft Plan will require revision to ensure it is consistent with the Guidelines, in order to ensure your Plan avoids the very real risk that occasional flood events pose to the safety and security of people and property.

Finally, the Office would like to take the opportunity to commend the planning authority for its use of interactive GIS in the plan-making process, which is considered to represent best practice and can be anticipated to increase the public's understanding of the Plan and how it relates to their local area.



The planning authority will also be aware that the Office's evaluation of the draft Plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act in relation to climate change. The definition of appropriate settlement boundaries, the zoning of lands for specific uses (section 10(2)(a) of the Act), and the establishment of guiding policies for smaller towns and settlements are vital tools available to the planning authority in promoting effective integration of land use and transportation policies and addressing the requirements of section 10(2)(n).

It is within this context the submission below sets out 10 recommendations and 4 observations under the following nine themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#"><u>Core strategy and settlement hierarchy</u></a>	Recommendation 1, 2 and 3	
<a href="#"><u>Compact growth, regeneration and tiered approach to zoning</u></a>	Recommendation 3, 4, 5, 6, 7 and 8	
<a href="#"><u>Rural housing and rural regeneration</u></a>		Observation 1
<a href="#"><u>Economic development and employment (including retail)</u></a>	Recommendation 9	Observation 2
<a href="#"><u>Sustainable transport and accessibility</u></a>		Observation 3
<a href="#"><u>Climate action and renewable energy</u></a>		
<a href="#"><u>Flood risk management</u></a>	Recommendation 10	
<a href="#"><u>Environment, heritage and amenities</u></a>		
<a href="#"><u>Other Matters</u></a>		Observation 4



## **1. Core Strategy and Settlement Hierarchy**

### **1.1 Core Strategy population and housing targets**

The government's targets for the delivery of homes in line with population growth are set out through the *National Planning Framework Implementation Roadmap* and the *Section 28 Guidelines: Housing Supply Target Methodology for Development Planning*. These documents set out the assumptions and methodology to be followed to ensure that the overall objectives of the National Planning Framework, as transposed through the RSES, can be met and that housing can be delivered in a sustainable and planned manner and in alignment with the delivery of necessary investment in infrastructure.

As outlined below the Office has, however, identified a number of areas where it would appear that the approach followed in the preparation of the Core Strategy is not consistent with the above. The cumulative effect of the approach the Office understands the planning authority has adopted is to arrive at a significantly higher level of growth over the Plan period than provided for under the NPF or RSES.

In relation to population growth, the *National Planning Framework Implementation Roadmap* sets out the population projections for each of the counties (not for each planning authority) to 2026 and to 2031. It allows that planning authorities where population is projected to grow at or above the national average baseline may apply up to 25% additional headroom up to 2026 with a view to converging with the 2031 population projection in the period 2026-2031.

The planning authority has correctly applied an additional headroom of 7,650 population for 2026 in accordance with the Roadmap. However it would appear the planning authority has then carried forward the additional headroom allowance to the NPF Roadmap and RSES population projections beyond 2026 which is not provided for in the Roadmap, and which effectively increases the projected population for 2031 from 398,000 to 405,650.

Population growth can also only be calculated for the plan period, which according to current timeline is up to Q2 2028. It would appear that your authority's calculation, to

the end of 2028, exceeds the plan period by 6 months. This results in a further over-calculation of population growth and housing requirements for the plan period.

Cumulatively, the Office estimates that the population growth projected in the draft Plan exceeds the NPF target by in the region of 4,200.

*The Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*, published shortly before the draft Plan issued to the elected members, sets out the latest required methodology for determining housing supply targets for the plan period.

These Guidelines, published by the Minister under Section 28 of the Act, provide a focussed approach to the delivery of just over **33,000 new households per annum** nationally, in line with government policy and in accordance with the NPF targeted population growth and the distribution of this growth across our counties. The Office acknowledges that the planning authority had a limited period of time to undertake this process and that the material alterations stage will provide the necessary opportunity to review the Core Strategy to ensure consistency with the Guidelines.

The Guidelines, and associated Circular, provide for two possible adjustments to the NPF 50:50 targets in circumstances where (a) housing completions over previous years are significantly below the average annual number of homes required to meet the NPF targets (Adjustment 'E'), or (b) increased growth rates in the short term where housing completions are currently exceeding the average annual targets (Adjustment 'F').

The draft Plan calculates housing supply for the County on the basis of Adjustment F which results in a housing target of 29,316 to 2028 (appendix B5).

However, according to the CSO data, average annual housing completions since 2017 are c.1,200 per annum. The NPF target for the same period equates to almost 2,170 per annum. As such, average annual targets are not being exceeded in Cork County, and Adjustment F is not therefore applicable.

The NPF 50:50 provides a challenging target of c.3000 homes per annum in Cork County over the plan period. This is more than double what has been constructed





annually since 2017. The draft Plan calculation of c.4500 units per annum<sup>1</sup> is not, therefore consistent with the NPF and the Guidelines, and the Core Strategy must be reviewed without the inclusion of Adjustment F.

The over-calculation of housing targets also has important implications in terms of the ability to plan for the timely delivery of physical and social infrastructure in the right location to serve new housing development. It risks requiring infrastructure that will be of excessive capacity, taking longer to deliver and at greater cost. As a consequence, the review of the Core Strategy is also likely to involve a review of the quantum and location of land zoned for residential development to accommodate the revised housing supply needs.

### Recommendation 1 - Core Strategy population and housing target

In accordance with Section 10(2A) of the *Planning and Development Act 2000*, (as amended) and having regard to the *Section 28 Guidelines: Housing Supply Target Methodology for Development Planning*, the planning authority is required to revise the Core Strategy, including population and housing projections for the 6-year period of the Plan, as follows:

- (i) The population projections must be calculated in accordance with the provisions of the 'NPF Implementation Roadmap' regarding transitional population projections and the population projections under the RSES for the Southern Regional Assembly. This will require the omission of the additional headroom applied in the core strategy population calculations for the period post 2026.
- (ii) The housing targets must be calculated in accordance with the '*Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*'. For County Cork, this will require the omission of the adjustment that has been applied under adjustment F in the calculations in appendix B5 of the draft Plan.

<sup>1</sup> But taking account of the anticipated additional delivery of 2080 units to the adoption of the plan Q3 2020.





## 1.2 Core strategy, settlement hierarchy and distribution of growth

The core strategy is required, under section 10(2A)(a) of the Act, to demonstrate consistency with the NPF, RSES and with specific planning policy requirements of section 28 guidelines, and under subsection (b) to show how the core strategy takes account of Ministerial guidelines in relation to population targets (section 10(2A)(b) and section 10(2A)(f)(iii) refer). The setting out of the planned distribution of population growth through a county settlement hierarchy in accordance with section 10(2A)(f), aligned with the details required under sections section 10(2A)(c) and (d), are critical in this respect. This is consistent with the Department's *Guidance Note on Core Strategies* (November 2010), which clarifies that the key statistics regarding distribution of future population and housing, are included in a core strategy table.

The draft Plan provides a high-level core strategy table (2.8) with information based on the four Strategic Planning Areas (SPAs), supplemented by more detailed tables for each of the attached in appendix B (tables B1, B2, B3 and B4). Although the approach provides useful supporting information in view of the large size of the county, in order to be consistent with the legislative requirements and national guidance a core strategy table should be provided for the county as a whole. This would also make it easier for stakeholders, including the general public, to clearly understand the proposed distribution of growth across the county. A single, fully detailed core strategy table for the county is, therefore, required to address this matter.

In addition to the above, a single settlement hierarchy for the county as a whole should also be set out in the core strategy to provide clarity, and addressing the following:

- The core strategy tables do not currently designate or identify the Key towns of Mallow and Clonakilty as a tier, which is inconsistent with section 3.5 of the RSES and RPO 11 and does not reflect their critical role underpinning the implementation of the RSES.
- It would also appear that the individual settlement hierarchies for each of the four SPAs are based on different criteria and do not consistently follow the



settlement typology approach in table 3.3 of the RSES. For example, the designation of settlements as 'main towns', 'key villages' and 'villages' does not appear to be consistently applied in accordance with the RSES settlement typology, including the threshold for towns and villages >1500 (CSO 2016). This makes it difficult to understand the application of population and housing growth across the county.

The provision of a single settlement hierarchy within the Core Strategy that reflects, and is consistent with, the settlement typology in the RSES is, therefore, required to address this matter.

In terms of population and housing distribution, although the distribution of projected population growth between the four SPAs appears reasonable, housing growth allocation does not fully correspond with same and will, in any case, need to be reviewed in light of the recommendation 1 above. It is important in this respect to stress again that the Housing Supply Targets (HST) arising from the section 28 Guidelines reflect the housing supply requirements to meet the population growth set out in the NPF Roadmap and must be used as the basis for determining the distribution of housing requirements across the settlement hierarchy and associated land use zoning.

The Office also considers that the following matters should be addressed:

- The growth levels within many, if not the majority of settlements across all settlement tiers appear excessive in view of NPO 9 which limits growth to 30% (between 2016 and 2040) for all settlements other than the five cities and their suburbs, the regional growth centres and the key towns designated under the RSES. Although indicating a higher level of growth rates for the Metropolitan Area main towns and key villages along the suburban rail network is justifiable and indeed desirable, the actual level of anticipated growth has to be realistic and sustainable and to be catered for by sufficient services capacity. However, there is no apparent justification for such high levels of growth for less connected settlements and for settlements outside the County Metropolitan Area SPA (except for the designated Key Towns of Mallow and



Clonakilty) as this is inconsistent with the national and regional policy context. As noted above in relation to recommendation 1, this approach will undermine the efficient delivery of infrastructure and services by the planning authority and other agencies to support the rapid delivery of housing in the right locations.

- The distribution of population and housing growth to the settlement tiers is currently somewhat difficult to determine as the information is distributed between different tables, the designation of settlement tiers are inconsistent between some of the four SPAs, and the tables do not provide the full details required under the Act. In particular, no population projections are provided for villages (other than key villages tier) or for the open countryside outside of towns and villages (only aggregate figures are required for each of these two tiers).
- A review of core strategy tables B1 to B4 would seem to indicate that the sum of the projected population growth for the settlements and/or settlement tiers exceeds the total projected population provided for in the draft Plan.

## Recommendation 2 - Core strategy, settlement hierarchy and distribution of growth

Having regard to the detailed requirements for core strategies under section 10(2A) of the *Planning and Development Act 2000*, (as amended) and taking due account of the Department's 'Guidance Note on Core Strategies' (DEHLG, November, 2010), the planning authority is required to provide a revised core strategy in volume 1 of the draft Plan, and in particular, to:

- (i) provide a single core strategy table for the county as a whole;
- (ii) set out a settlement hierarchy for the entire county that is consistent with the settlement typology under section 3.2 and table 3.3 of the RSES, including the identification of the designated Key towns of Mallow and Clonakilty as a distinct settlement tier, the application of the 1500 population threshold (CSO 2016) for towns and villages, and the provision for the separate settlement

- tiers for (I) small towns / village <1500 and (II) the open countryside outside of towns and villages consistent with section 10(2A)(f)(vi) of the Act;
- (iii) provide the required details (population projections and housing allocation) for individual towns >1500 population and for, in aggregate, (I) town and village settlements <1500 and (II) the open countryside outside villages and towns in accordance with s.10(2A)(f);
  - (iv) ensure that the sum of the population and housing allocations across all the settlements and settlement tiers align fully with the total population and housing targets as may be revised in accordance with recommendation 1; and
  - (v) revise, and where necessary reduce, the population and housing allocations for settlements so that the growth rate is consistent with NPO 9 of the NPF and RPO 11 of the RSES, and to avoid disproportionate levels of new housing development in relatively small settlements with inadequate capacity to provide the necessary services and infrastructure, including public transport accessibility.

### 1.3 Residential Land Supply

The Office commends the Council for its approach to revisiting the extent of historical residential zonings in the approach to the draft Plan from 2,064ha to 836ha. This will more readily enable the planning authority and other agencies to focus delivery of essential infrastructure, services and facilities on more precise locations where housing can be more rapidly be developed, supported by physical and social infrastructure and amenities. However, the reduction, although significant, has to be seen within the context of the existing largescale over-zoning in the county and it is therefore important that the total quantum of zoning for residential uses is evidence-based and relates directly to potential housing yield.

The core strategy tables in appendix B set out the housing yield for zoned land and for the existing built footprint. However, the housing yield from zoned land only relates to lands zoned residential (RE) and does not include lands zoned for a mixture of residential and other uses, such as town centres / neighbourhood centres (TC) and community (C). This approach is not consistent with the requirements of

sections 10(2A)(c) and (d) of the Act and results in greater demand for zoning of greenfield land for residential development.

A review of the core strategy would also suggest that the proposed residential zoning could accommodate development at an average residential density of <30uph.

This does not take account of the potential yield from infill/brownfield development, regeneration sites and lands zoned for mixed-use and residential development. It is important, therefore, that the core strategy and associated land use zoning is evidence-based and supported by appropriate residential density assumptions.

In this regard the determination of potential housing yield should be seen to be consistent with the policy approach and standards in the Plan governing residential density across the different settlement tiers of the core strategy. In summary, the proposed figure is based on assumptions regarding population growth and housing supply targets, housing yield on mixed-use lands and on infill / brownfield yield (compact growth), residential density approach and the tiered approach to zoning (recommendation 6 below refers), over which matters have been raised by the Office.

The quantum of land proposed to be zoned to accommodate residential development will therefore have to be reviewed to take account of any amendments required to address these matters.

### Recommendation 3 - Residential Land Supply

Having regard to section 10(2A) of the *Planning and Development Act 2000*, (as amended) the requirement for compact growth in accordance with National Policy Objective 3, and the approach to zoning required under National Policy Objective 72 (a-c), the planning authority is required to;

- (i) review the quantity of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.8 and tables B1 to B4, as appropriate) to ensure consistency with the housing supply targets, as required under the section 28 Housing Supply Targets Methodology for



- Development Planning Guidelines for Planning Authorities (December, 2020), having regard to current guidelines relating to residential density; and
- (ii) review density assumptions used to estimate the quantity of zoned land arising from the Housing Supply Targets in the revised Core Strategy having regard to the recommended residential densities for large towns, small towns and villages in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009).

The planning authority shall take account of any amendments made in response to the recommendations and observations set out in this submission, in particular Recommendations 1 and 2. The zoning of all lands must also be reviewed based on the Tiered Approach to Zoning (recommendation 4).

## **2. Compact growth, regeneration and tiered approach to zoning**

### **2.1 Compact Growth**

It is an objective (NPO 3c) of the NPF that 30% of all new homes (other than the five designated cities and their suburbs and the regional growth centres) are to be delivered within the 'existing built up footprint' of settlements (clarified in end-note 17 of the NPF) in order to achieve National Strategic Objective 1, compact growth. RSES RPO 35 is also relevant in this respect.

The Office notes the significant work that has been done by Cork County Council in more realistically re-appraising the extent of legacy land use zoning objectives for residential development in its plan-preparation process, re-focusing the extent of new residential lands from 2,064ha to 836ha.

This approach supports the national and regional policy objectives for compact growth and is a significant achievement given the pressures that are on the Council to deliver housing development and the time constraints within which the plan preparations were carried out.

The core strategy takes account of the anticipated housing yield for development within the 'built footprint', which is generally consistent with the requirement for compact growth (NPO 3c and RPO 35c), except that a footnote to the tables in



appendix B explains that this does not take account of lands zoned specifically under Plan.

The planning authority should consider defining on the land use zoning maps those lands that will contribute to the compact growth target (>30% of housing units) to accommodate infill/brownfield development consistent with the definition under the NPF, which should be reflected in the core strategy table. This approach will enable your authority to better highlight its positive approach to compact growth and to facilitate implementation and monitoring of same.

Having regard to the nature of the CSO boundaries to settlements in the county, it is important that consideration of those areas identified as contributing to compact growth is based on the UN criteria referred to in End-note 17 and the broader provisions of the NPF regarding compact growth.

## **2.2 Regeneration, implementation and delivery**

The Office welcomes the approach to regeneration in the draft Plan. In particular Chapter 9, addressing town centres and retail, takes a holistic view of the different uses which together make up vibrant centres. Objective TCR 9-1: Town Centres sets out a positive approach to promote town centre development, including the town centres first approach with more proactive land management and a more engaged and holistic approach detailed by the planning authority. The other objectives on vacancy (TCR 9-2), the retail hierarchy (TCR 9-3 to TCR 9-12, table 9-1) and town centre-focused retail (TCR 9-13) are all reasonable and consistent with the guidelines.

The identification of individual regeneration sites in the settlement plans (Volumes 3-5) are also welcomed in view of the requirements of RPO 43 Regeneration, Brownfield and Infill Development.

The Office is satisfied that the draft Plan, combined with the proposals and objectives relating to settlements and place making, has the potential to drive regeneration across the range of settlements.





### 2.3 Approach to Development

The development strategy for the county is primarily focused on the towns and designated strategic development areas within the Metropolitan area. However, notwithstanding that this approach can be seen to be consistent with the objectives of the NPF and RSES, the Office has some concern about the approach to development proposed at Carrigaline and at Carrigtwohill.

**Carrigaline** - The Office notes the proposed extent of land use zoning on the northern periphery of Carrigaline, including Residential Reserve, High Technology Campus Development and Business and General Employment land use zones. The said area is adjacent to the zoned area of Ringaskiddy and, therefore, the proposed zoning will potentially result in the coalescing of the two settlements into an extensive single conurbation which is inconsistent with the National Strategic Objective for compact growth under the NPF.

The Office acknowledges that most of this area of land (44ha) was considered in the Metropolitan Strategic Land Reserve Study (2018)<sup>2</sup>, identified as site SLR2 Fernhill. The study noted the site's role as a greenbelt and buffer between the residential area of Carrigaline and Ringaskiddy Strategic Economic Employment as a constraint, but recommended that the northwest section (c.15ha) be considered in the next stage of the SLR assessment process. The Office is not aware of any update to the SLR process.

Section 1.2.1 of Volume 4 (Part 1), Carrigaline Municipal District notes the need to adjust the land use zonings of strategic land banks at Ringskiddy to take account of severance caused by the M28 road alignment, with a view to optimising and maximising lands zoned for Industry at the location. Disregarding that the subject proposed zonings would not appear to fall within the scope of the required adjustment, the approach to land use zoning must accord with the overriding objective and National Strategic Outcome for compact growth which will be breached

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<sup>2</sup> *Metropolitan Cork Strategic Land Reserve Site Assessment Process, Update for Members Development Committee, 19<sup>th</sup> October, 2018* (Cork County Council) <http://corklocalareaplans.com/wp-content/uploads/2018/11/Strategic-Land-Reserve-Final-Report-19-October-2018.pdf>

by the provision of zoning for, in effect, continuous development between the two settlements.

In view of the level of growth that has taken place in Carrigaline and Ringaskiddy and the level of growth proposed for the two settlements under the draft Plan, the Office would encourage the planning authority to include an objective in section 1.3 Carrigaline and section 1.5 Ringaskiddy of Volume 4, Part 1, of the draft Plan, to prepare a local transport plan for these two settlements as a priority in consultation with the NTA and TII.

#### Recommendation 4 – Approach to development in Carrigaline

Having regard to the National Strategic Objective for compact growth under the NPF, the planning authority is required to omit proposed land use zonings CL-RR-01, CL-HT-01 and CL-B-02 at the northeast of Carrigaline to maintain a separation between Carrigaline and Ringakiddy in order to prevent the two settlements from merging into a single conurbation.

**Carrigtwohill** - There are similar concerns for the extension of Industrial land use zoning west of Carrigtwohill which would provide for almost continuous development with Glounthaune. The large scale of the proposed 'Industrial, Business and General Employment and Residential' land use zonings within this relatively small settlement (c.5000 population) conflicts with the objectives for compact growth under the NPF and RSES, notwithstanding its location on the Middleton rail line.

According to TII, the access to the national road network via junction 3 (Cobh Cross) of the N25 has capacity issues. This may limit the development potential of lands in the area. In addition, Irish Water indicates that there is insufficient wastewater treatment capacity to cater for the projected growth for Carrigtwohill additional to that projected for Midleton, although the settlement strategies for these settlements would indicate that there are capacity constraints for Midleton but not for Carrigtwohill.

In view of the requirements under section 10(2A)(d) that zoning proposals accord with national policy that development of land take place on a phased basis, the



planning authority should consider the phased approach to the delivery of residential development at Carrigtwohill, based on a sequential approach. The proposed extension of the industrial lands west towards Glouthaune should be omitted in order to ensure the preservation of a reasonable separation between the two settlements and to provide for more compact growth.

In view of the scale of the existing and proposed level of growth envisaged for the settlement, and the apparent capacity constraints on the access to the N25, and noting section 2.3.57 *Movement*, the Office would encourage the planning authority to include an objective in section 2.3 *Carrigtwohill* of Volume 4, Part 1, of the draft Plan, to prioritise the preparation of a local transport plan in consultation with the NTA and TII.

#### Recommendation 5 – Approach to development in Carrigtwohill

Having regard to the National Strategic Objective for compact growth under the NPF, to the apparent capacity constraints to access and to wastewater treatment in the settlement, and to the requirements under section 10(2A)(d) of the *Planning and Development Act 2000*, (as amended) that zoning proposals accord with national policy that development of land take place on a phased basis, the planning authority is required to:

- (i) omit the proposed extension of Industry land use zoning CT-I-01 to the west of Carrigtwohill; and
- (ii) to provide for the phased, sequential development of residential lands in Carrigtwohill having regard to the capacity constraints for wastewater treatment in this area.

#### 2.4 Tiered approach to zoning

NPO 72a requires planning authorities to apply a standardised tiered approach to differentiate between tier 1 lands (serviced land) and tier 2 lands (lands that can be serviced during the plan period) for all land use zoning types. This requires the planning authority to make a reasonable estimate of the full cost of delivery of specified services (at draft and final plan stages) in a report (NPO 72b), the

methodology for which is set out in Appendix 3 of the NPF. It provides that lands that cannot be serviced within the plan period should not be zoned (NPO 72c).

The Office welcomes the Council's inclusion of a high level overview of the critical infrastructure for the core strategy attached as Appendix D to the draft Plan.

Although it is reasonably detailed it is based on the settlement, rather than on specific zoned lands and it does not distinguish between lands that are fully serviced (tier 1) and land that has outstanding requirements for specific service/infrastructure provision, but which can feasibly be provided during the plan period (tier 2), nor does it appear to include any cost estimates for the delivery of that infrastructure.

The details of water infrastructure capacity for the settlements in Volumes 2 to 5 of the draft Plan are also noted. According to section 19.8 of the draft Plan, the county has infrastructure in place to accommodate the construction of c.7000 residential units, which is substantially below the housing supply requirements for the plan period. The situation for other land use zones is unclear. The infrastructure capacity assessments attached to the draft development plan of Dún Laoghaire Rathdown County Council may be an appropriate example to follow.

### **Recommendation 6 - Tiered approach to zoning**

Having regard to NPO 72a, NPO 72b and NPO 72c, the planning authority is required to elaborate and expand upon its infrastructural assessment, as necessary, to fully address the status of all lands proposed to be zoned under the plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.

The written infrastructural assessment is required to determine which lands are tier 1 serviced zoned lands and which lands are tier 2 serviceable zoned land (i.e. they can feasibly be serviced during the plan period to accommodate development).

Lands which cannot be serviced during the period should not be zoned or taken into account in the core strategy for calculation purposes.



The inclusion of a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands, as required, in addition to the identification of tier 1 and tier 2 lands on the land use zoning maps would assist the implementation of the plan and provide important information to all stakeholders.

## 2.5 Standards and Guidelines

**Residential density** - The Office considers the overall proposed approach to residential density, as set out in Chapter 4 of the draft Plan (sections 4.7 to 4.10) to constitute a positive and rational approach to the application of appropriate residential standards across the diverse settlements contexts across the county.

The approach aligns reasonably well with the advice contained in the *Sustainable Residential Developments in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities* (DEHLG, 2009) (SRDUA guidelines), as clarified by *Circular Letter NRUP 2/2021*.

However some of the proposed standards in table 4.1 'Settlement Location Guide' and under sections 4.7 'Residential Density – Background' and 4.8 'Approach to Cork County's Settlement Hierarchy' of the draft Plan, relating to settlements, appear inconsistent with the SRDUA guidelines and/or are somewhat unclear and therefore should be revised in order to ensure implementation of compact growth in accordance with the objectives of the NPF and RSES.

### Recommendation 7 - Residential density

Having regard to the recommended standards for residential densities as set out in the *Sustainable Residential Developments in Urban Areas (Cities, Towns and Villages) Guidelines for Planning Authorities* (DEHLG, 2009), issued by the Minister under Section 28, the planning authority is required to amend the following proposed standards:

- (i) Key village <1500 and villages – The proposed low density rate of 5-20uph is significantly below the rate of 15-20uph referred to in the guidelines. The

- guidelines provides that where they are applied, such rates should be limited to no more than 20% of planned new housing stock per settlement.
- (ii) Smaller towns (<1500) and key villages (>1500) - The draft Plan suggests that the high density rate (50uph+) would apply to the town centres, which may not be appropriate for settlements of this size in view of the guidelines.
  - (iii) Where the proposed density approach is amended in line with this recommendation, the extent of land use zoning should be amended accordingly.

The Office notes that the draft Plan does not include a chapter on development management standards, but rather disperses standards through the various chapters of the plan. The planning authority should consider what mechanism it might employ to ensure that all relevant development management standards will be easily accessible to members of the public.

## 2.6 Traveller Accommodation

Chapter 4 of the draft Plan addresses specialised housing requirements of certain sectors of society, this includes provision for the travelling community (HOU 4-4). This policy objective is aspirational and refers the 'Draft Traveller Accommodation Programme 2019-2024'. It is considered that the draft Plan does not include clear and implementable objectives for the provision of accommodation for Travellers. The land use zoning maps also do not appear to indicate the location of lands to provide for such accommodation, as required under section 10(2)(i) of the Act.

### Recommendation 8 – Traveller accommodation

Having regard to the requirements of section 10(2)(j) of the *Planning and Development Act 2000*, (as amended) the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose in accordance with the legislative requirements under section 10(2)(i) of the Act.

This will include the identification of specific locations in the land use zoning maps for the county.



### 3. Rural Housing and Rural Regeneration

The Council's rural housing policy approach is considered to be evidence-based, reasonable and consistent with the legislative and policy context, including NPO 19 and the *Sustainable Rural Housing Guidelines for Planning Authorities* (2005).

The policy approach of the Council (RP 5-1) to discourage urban generated housing in rural areas and to direct same to urban centres, towns and villages, including through the provision of a mix of house types in towns and villages to provide an alternative to individual housing, will support the regeneration of rural villages and small towns.

The proposed policy approach will encourage small scale rural business and tourism (RP 5-28), will also encourage employment growth in county towns to support the town and wider rural population and will promote innovation and diversification in rural economies (EC 8-11) and diversification in agriculture and farms (EC 8-12), in addition to protecting mineral extraction activities (EC 8-13), forestry (EC 8-14) and fishing / aquaculture (EC 8-15) will support the development of rural based economic development. Extensive land has also been zoned in small towns and rural villages across the county to facilitate employment generation development. The draft Plan can therefore be seen to strongly support the development of rural areas in a planned and sustainable manner.

However, it is noted that although the draft Plan considers the existing registered quarries in the county, it does not identify or map the location of major deposits as advised by the section 28 *Quarries and Ancillary Activities Guidelines for Planning Authorities* (DEHLG, 2004) and the guidelines are not referenced in the Plan. The NPF highlights the key role of the planning process in realising the potential of extractive industries in identifying and protecting important mineral reserves for future use.

#### Observation 1 – Aggregates Resource Mapping

Having regard to the provisions of *Quarries and Ancillary Activities Guidelines for Planning Authorities* (DEHLG, 2004) and to the important role that extraction



activities play in the rural economy, the planning authority is advised to prioritise the identification of major mineral deposits in the development Plan, including through mapping as appropriate.

## **4. Economic Development and Employment**

### **4.1 Retail**

Under the *Guidelines for Planning Authorities Retail Planning* (2012), the retail policy approach set out in the development plan is required to be informed by a Joint Retail Strategy prepared in conjunction with Cork City Council in order to secure plan led development in accordance with the first national policy objective of the Ministerial guidelines.

Section 9.5.7 of the draft Plan indicates that a Draft Joint Retail Strategy and Joint Retail Study was still in preparation at time of publication of the draft Plan and therefore has not informed the policy approach. The study and strategy relates only to the Metropolitan Area of the City and County. The Guidelines indicate, however, that a Joint Retail Strategy is required for the full extent of the planning authorities concerned, with reference to the additional retail floor space required to support the settlement hierarchy, the quantity and type of retail floor space requirements by constituent authorities, and guidance on the location and function of retail objectives taking account of the *Retail Planning Guidelines* policy objectives and the relevant settlement hierarchy.

In addition, in view of Variation No. 1 to the current county development plan regarding outlet centres and sections 9.11.9 –9.11.12, inclusive, which refer to the need to identify potential suitable locations for an outlet centre, it is essential that the Joint Retail Strategy for the combined area of the two planning authorities considers the locational aspects of any such regionally significant form of retail development.

In view of the provisions of section 9(4) of the Act and the issuing of a Ministerial letter to Cork County and Cork City Councils under section 9(7) of the Act concerning co-ordination of the objectives for retail outlet centres, it is anticipated that the Joint Retail Strategy and the development plans for the two authorities will determine the capacity and scope for retail outlet development in Cork City and County, and if



applicable, the general location, format and scale (i.e. floor space) of any retail outlet centre development during the development plan period.

The Office advises that particularly in view of the need to address climate change through sustainable settlement and transportation strategies under section 10(2)(n) of the Act, the draft Plan (and Joint Retail Strategy) should more fully reflect the provisions of the *Retail Planning Guidelines* under section 4.11.4 Outlet Centres, which states ‘outlet centres should not be permitted in more remote out-of-town locations.’

It is also noted that the draft Plan does not provide the minimum information required for development plans under section 3.3 of the guidelines, including, inter alia the defined boundary of core shopping areas (and district centres) and a broad assessment of additional retail requirement. The planning authority should consider including these boundaries on the land use zoning maps.

### Recommendation 9 - Joint Retail Strategy

Having regard to the requirements of the *Guidelines for Planning Authorities Retail Planning Guidelines* (DECLG, 2012) the planning authority is required to prepare an appropriately detailed Joint Retail Strategy with Cork City Council to secure plan-led development for retail within the two neighbouring authorities. The Joint Retail Strategy is required to:

- (i) address the functional area of the two authorities, not just the Metropolitan Area;
- (ii) inform the core strategy, retail hierarchy and retail policy approach of the county development plan consistent with the provisions of the Guidelines, including in particular the key messages, the five national policy objectives in section 2.5, and the detailed ‘Development Plan and Retailing’ requirements as set out under section 3.3;
- (iii) identify the additional retail floor space required to support the settlement hierarchy, the quantity and type of retail floor space requirements by constituent authorities, and provide guidance on the location and function of

- retail objectives taking account of the Retail Planning Guidelines policy objectives and the relevant settlement hierarchy; and
- (iv) having regard to the Minister's letter under section 9.7 of the Act concerning co-ordination of the objectives for retail outlet centres, the Joint Retail Strategy is required, in particular, to consider the implications of retail developments contemplated in the draft Plan such as outlet centres referred to under section 9.11 of the draft Plan.

## 4.2 Employment and enterprise

The draft Plan introduces a highly strategic and well-considered approach to the development of employment and enterprise development in the county, focussed on strategic employment locations, in particular. However, in general, the land use zoning for employment and enterprise type uses has been retained as per the existing Municipal District LAPs, excepting some expansion in the Metropolitan Area, particularly in the main harbour towns and employment and enterprise areas. There is no indication that an evidence based review has been conducted and in some of the main towns extensive and / or peripheral zonings have been retained (for example, at Skibbereen and Kanturk).

Although the Office appreciates the need for the planning authority to facilitate employment generating development through zoning sufficient lands, some of the zonings would appear to conflict with the principle of compact growth. They will therefore be more than likely to be based on personal transport rather than public transport and active travel and therefore conflict with the requirements under section 10(2)(n) of the Act concerning addressing climate change. This is contrary to the stated approach of the Council to integrated land use transport (TM 12-1)

It also not apparent whether all these lands are serviced (tier 1) or can feasibly be fully serviced within the plan period (tier 2) consistent with the tiered approach to zoning, which requires a more focussed and evidence based approach to zonings in the interest of efficiency and of maximising return on infrastructural investments.

## Observation 2 – Employment and enterprise

Having regard to National Strategic Outcome for Compact Growth, the planning authority is requested to reconsider the approach to economic and enterprise zonings throughout the county, having regard to the requirement to:

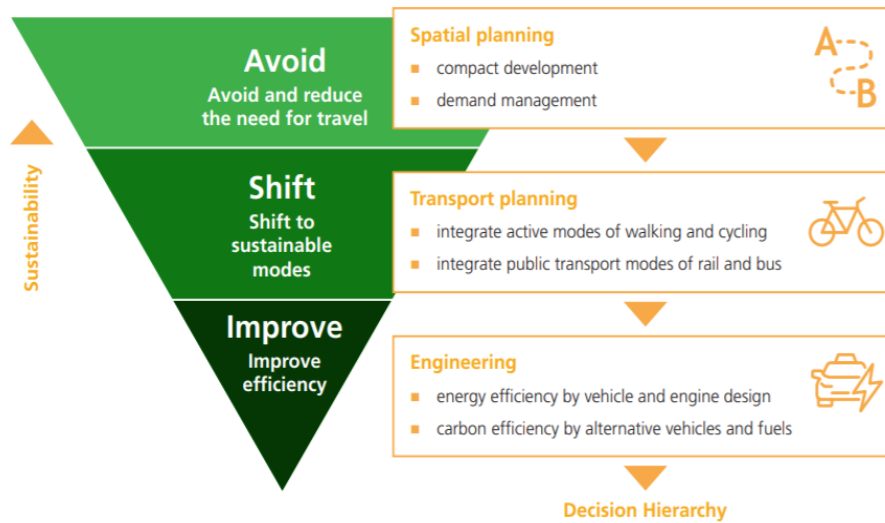
- (i) implement the Tiered Approach to Zoning under NPO 72a-c of the NPF; and
- (ii) mitigate climate change through sustainable settlement and transport strategies under section 10(2)(a) of the Act, including future-proofing through more compact forms of development including the prioritisation of locations that are served, or that over the lifetime of the Plan, will be served by the public transport and active travel networks necessary to facilitate sustainable travel.

### 5. Sustainable Transport and Accessibility

The Office welcomes the overall provisions of the draft Plan to transport set out in Chapter 12. The policy approach, which is underpinned by two key concepts - integrated approach to land use transport planning, and implementation of the Avoid-Shift-Improve (ASI) framework approach – and aims to achieve seven clear and relevant objectives.

The Office considers this approach consistent with the requirement under section 10(2)(n) of the Act to include objectives for sustainable settlement and transport strategies, which can be anticipated to secure a reduction in energy use and GHG emissions, which is acknowledged in the chapter.

However care should be taken to ensure the ASI framework, and the initiatives, objectives and programme measures detailed in Table 12.1 *Integrated Land Use and Transport* accurately align with the ASI framework so that it can be more effectively implemented and understood.



**Figure 1 – ASI framework**

Policy objective TM 12-1 sets out the detailed policy approach for integrated land use and transport strategy, which is comprehensive in scope. In particular the commitment to the application of DMURS (which are the official applicable standards for urban areas within the 60kph speed limit zone) as the design standard for roads within the 60kph zone is welcomed. In order to maximise the potential modal shift from the implementation of DMURS, these standards need to be applied consistently across the departments of the Council, including through the more detailed forward planning process (LAPs, master plans) and at development management stage.

The proposal to provide Local Transport Plan (LTPs) for all towns >10,000, where appropriate, is positive, however this is limited to the settlements of Carrigaline, Cobh, Middleton and Mallow, based on the 2016 census. The Office would suggest that in view of the core strategy proposal to increase the population of Carrigtwohill, Bandon, Youghal to almost to or above 10,000 the requirement for LTPs should also be applied thereto in order to ensure the sustainability of their development. This is particularly important for Carrigtwohill in view of its proximity and access to the N25 at junction 3 where there are capacity constraint issues. The *Area Based Transport Assessment Advice Note* (2018), published by the NTA and TII, should be followed in this regard.



The Office supports the objective under TM 12-1 that new employment and residential development will be consolidated and intensified to render it serviceable by public transport and highly accessible by active modes. However the proposed zonings for Business and General Employment and for Industry across the county, which have not been altered from that in the Municipal District LAPs and are quite extensive and frequently peripheral to settlements may conflict with this objective. This will be similarly so where residential zonings are based on excessive population and housing growth targets (addressed above). ‘The Business and General Employment’ and for Industry zonings for settlements outside of the Metropolitan Area should be reviewed and revised as necessary to ensure the effective implementation of the aforementioned objective.

The modal shift baseline data and targets for settlements across the county is an important addition to the draft Plan and is commended by the Office. It will provide the planning authority with the tools to plan for and measure the effectiveness of its sustainable transport strategy, consistent with the requirements of section 10(2)(n). The Office would also encourage the planning authority to consider the range of policy measures that will facilitate a modal shift for people living in rural areas, including those living in small towns and villages and in the open countryside, and to consider targets and monitoring for same over the plan period, in order to comply with section 10(2)(n) in respect of rural areas.

The proposed parking standards in the draft Plan, including maximum standards for cars (within the Metropolitan Area) and minimum standards for bicycles, are considered generally appropriate in view of the requirements for criteria based standards under NPO 13.

### Observation 3 – Sustainable Transport and Accessibility

Having regard to the requirement to include objectives for sustainable settlement and transport strategies under section 10(2)(n) of the *Planning and Development Act 2000*, (as amended) the planning authority is advised that the following amendments would further improve the overall sustainability of the approach to transport under Chapter 12:

- (i) the ASI framework, and the initiatives, objectives and programme measures detailed in Table 12.1 Integrated Land Use and Transport should be revised to more accurately align with the ASI framework;
- (ii) the commitment to implementing DMURS under TM 12-1 should refer to its implementation in the preparation of all statutory (LAPs) and non-statutory plan (e.g. master plans) and through the development management process;
- (iii) Local Transport Plans should be provided for all towns where the population is projected to grow to, or near to the 10,000 person threshold under the core strategy, including Carrigtwohill, Bandon and Youghal, and should prioritise, in particular, the preparation of an LTP or LTPs for Carrigaline and Ringaskiddy, and for Carrigtwohill, Glounthaune and Middleton, in consultation with the NTA and TII;
- (iv) the extent and location of Business and General Employment and for Industry zonings for settlements outside of the Metropolitan Area should be reviewed and revised, as necessary, to give effect to the objective (TM 12-1) of the plan that new employment development will be consolidated and intensified to render it serviceable by public transport and highly accessible by active modes; and
- (v) include or highlight the range of policy measures to facilitate a modal shift for people living in rural areas, including those living in small towns and villages and in the open countryside, and provide targets and monitoring for same over the plan period.

## **6. Climate Action and Renewable Energy**

### **6.1 Climate Action**

The Office welcomes the inclusion of a dedicated chapter on climate action and the detailing of the actions and objectives relevant to the achievement of reduced energy demand and reduced anthropogenic GHG emissions, and to the necessity to adapt to climate change.

The overall strategy, in terms of the focus of growth on the Metropolitan Area and on the rail network, and on the mains towns and key villages, and the overall strategy in terms of transport and mobility is consistent with the promotion of sustainable





settlement and transport strategies, in addition to the NPF and the RSES. However, as noted above, the core strategy provides for excessive population growth and housing development and the landuse zoning which is based on these figures is considered to be excessive (recommendations 1, 2 and 3, in particular refer). It cannot therefore be relied upon that development arising from the proposed zoning will be optimum in terms of location, particularly in the absence of phasing or sequential prioritising of the development of those lands, resulting in some conflict with section 10(2)(n). Furthermore, the policy approach to transport and mobility warrants some adjustment to ensure it is a sustainable transport strategy that will result in increased mode share for active and sustainable modes (observation 3 refers).

In addressing recommendations 1, 2 and 3, and observation 3, above the planning authority should consider the positive impacts that will arise in its climate actions consistent with the requirement to promote sustainable settlement and transport strategies for urban and rural areas 10(2)(n).

## **6.2 Renewable Energy**

The Office commends the planning authority for providing a coherent, rational and well-balanced renewable energy strategy in Chapter 14 - Energy and Communications, covering a wide range of renewable energy types and providing a justified approach to the consideration of onshore wind energy projects through the application of sieve analysis. This is considered to be best practice and is consistent with the *Wind Energy Development Guidelines (2006)*.

The Office welcomes the inclusion of the estimated contribution of the planning authority to the Government's renewable energy targets, which is consistent with the SPPR of *Circular Letter PL 5/2017 - Interim Guidelines*. However, the planning authority should ensure that the relevant renewable energy targets are referred to. The Office understands that these targets are currently set out in the Climate Action Plan 2019.



## 7. Flood Risk Management

A *Strategic Flood Risk Assessment* (SFRA) has been carried out by the planning authority and is appended to the draft Plan. This has been reviewed by the Office and by the OPW which has highlighted a number of inconsistencies with and departures from the guidelines published by the Minister for Housing Local Government and Heritage under Section 28 of the Act titled *The Planning System and Flood Risk Management, Guidelines for Planning Authorities* (DECLG and DECHLG, 2009) and *Circular PL2/2014*.

In particular, the plan-making Justification Test does not appear to have been applied or reported on in the preparation of the draft Plan in accordance with the detailed requirements and advice of the Guidelines. The Office appreciates that this may have arisen due to time constraints and the scale of the task of preparing a draft Plan for a county of this size and where all land use zonings have been integrated into the development plan.

While the planning authority has identified the majority of proposed zonings where it intends to carry out the plan-making Justification Test, on completion of the flood zone mapping, it has excluded those areas zoned Existing Residential/Mixed Residential & Other Uses and Existing Mixed/General Business/Industrial Use, for all settlements that are located in Flood Zone A and B. The Justification Test is required to be carried out **for all areas zoned** to accommodate future development, including, inter alia, infill and regeneration.

In addition, the OPW has raised issue with the proposed Town Centre/Neighbourhood Centre zonings at Mitchelstown (MH-T-01), Mallow (MW-T-08), Kanturk (KT-T-01 and KT-T-02) and Carrigaline (CL-T-01 and potentially CL-T-02) and with the Community zoning proposed at Castletownbere (CR-C-01).

The areas referred to above should therefore be specifically considered in a revised SFRA and be subject of the plan-making Justification Test.

Under the Ministerial Guidelines, as clarified by the Circular, all such areas are required to be subject of the plan-making Justification Test and, where a site does not pass all three points of the test, the lands should not be zoned for development

that is vulnerable to flooding. This will help ensure that future development is safe from flood risk and does not cause increased risk of flooding elsewhere.

### Recommendation 10 - Flood risk management

Having regard to the detailed requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities* (DECLG and DECHLG, 2009), section 28 guidelines, the planning authority is required to review the Strategic Flood Risk Assessment, in consultation with the OPW, to ensure consistency with the said Guidelines.

The land use zoning objectives under the draft Plan are also required to be reviewed and amended, as appropriate, having regard to the revised SFRA, and in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects.

## 8. Environment, Heritage and Amenities

### 8.1 General

The Office commends the comprehensive and systematic approach taken by the planning authority in addressing the wide range of issues relevant to the protection, preservation and improvement of environmental and built heritage and amenities, including Chapter 11 - Water, Chapter 14 - Green Infrastructure, Chapter 15 - Biodiversity and Chapter 16 - Built and Cultural Heritage, Volume 2 - Heritage and Amenity, the GIS mapping and the environmental reports.

The Office would suggest that the addition of a layer for archaeological heritage to the GIS mapping would assist in the better protection of such heritage through the plan-making process and through implementation at development management stage.

### 8.2 Environmental Assessments

Although the Office is not the competent authority for the purposes of the SEA Directive or the Habitats Directive, it notes the environmental assessment reports attaching the draft Plan. The format of the reports, in digital versions, as a combined

and very lengthy document militates against a review of these assessments by the interested members of general public and other stakeholders and prescribed authorities who may not have a technical background.

The Office would encourage the planning authority to consider how these important assessments can be made more accessible for members of the public as part of the plan-making process into the future.

The Office would also suggest that the planning authority ensure that the terminology used in the AA screening (Stage 1) determination and in the Appropriate Assessment (Stage 2) conclusion is consistent with the relevant legal test being applied at these separate stages.

In addition, the Office would advise the planning authority to satisfy itself, in consultation with the Development Applications Unit of Department, that its environmental assessment of the following policy areas and objectives of the draft Plan are sufficiently robust to support their implementation:

- The widespread expansion of greenways and blueways.
- Objective TM12.12 (e) & TM 12.14 (b) – Upgrade of R624 linking N25 to Cobh within the context of Great Island Channel candidate Special Area of Conservation (cSAC no. 1058) and Cork Harbour Special Protection Area (SPA no. 4030) and the habitats within Fota estate wall, in the SEA Environmental Report and appropriate assessment.
- Subsection 1.5 - Development in Munster River Blackwater and River Bandon (Dunmanway) catchments, within the context of freshwater pearl mussel habitat in the Blackwater (Cork/Waterford) candidate Special Area of Conservation (cSAC no. 2170) and the Bandon River cSAC (no. 2171)

## 9. Other Matters

### 9.1 Local Area Plans

As noted, above, the Office welcomes the inclusion of land use zoning into the county development Plan for all settlements, especially given the scale of the task presented by a county the scale of Cork.

In addition, the inclusion of settlement plans for the entire county is useful and provides certainty on policy as soon as the plan is made, thereby aiding immediate implementation. However, as the statutory requirements for local area plans (LAPs) for certain areas under section 19(1)(b) will still apply, it would be appropriate for the draft Plan to include objectives to prioritise the preparation for LAPs for relevant settlements, including the preparation of Local Transport Plans a, where appropriate.

#### Observation 4 – Local Area Plans

Having regard to the statutory requirements for the preparation of local area plans (LAPs) for certain areas under section 19(1)(b) of the Act, the Office would encourage the planning authority to include appropriate objectives relating to the priority for the preparation for LAPs for its relevant settlements, and to commit to the preparation of Local Transport Plans as part of the LAP making process, where appropriate, in consultation with the NTA and TII.

### 9.2 Extent and format of the plan

Notwithstanding the large scale of the county and the very considerable task of preparing a development plan, the Office would encourage the planning authority to consider how the finalised Plan may be made more concise and easy to follow in order to make it as useable as possible for members of the public.

The format approach employed in the draft Plan, that is its separation of the Plan into separate volumes based on geographical area (Municipal Districts), is a good approach. However the Office would suggest that an overall key map of the geographical area to which each of the volumes (2-5) relate would make it easier to navigate the Plan. In addition, given that the core strategy and overall planning strategy set out in volume 1 is based on the four Strategic Planning Areas, which do



not align with the boundaries to the Municipal Districts boundaries, it would also be useful to provide an overlay of the two sets of boundaries on a single key map.

### **In Summary**

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the Plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through [plans@opr.ie](mailto:plans@opr.ie).

Yours sincerely,

A handwritten signature in black ink that reads 'Niall Cussen'.

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**Niall Cussen**

Planning Regulator and Chief Executive