



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

7th April 2026

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

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

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1 (proposed Variation) to the Cork County Development Plan 2022-2028 (County Development Plan).

As Cork County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (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 proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment

with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

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

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The proposed Variation includes a number of changes to the County Development Plan with regard to (One) the implementation of the housing growth requirements under the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), (Two) proposed zoning changes arising from the 2025 Residential Zoned Land Tax (RZLT) mapping and submission process and (Three) incorporation of updated proposed land use zonings and policies into the County Development Plan.

The Office welcomes the preparation of the proposed Variation which seeks to implement the Housing Growth Guidelines and notes that the proposed allocation of growth within County Cork up to 2034 within the Metropolitan Area, the Greater Cork Ring, North Cork and West Cork is closely aligned to that of the current County Development Plan.

The Office also welcomes the reference to Long Term Strategic and Sustainable Development Sites (LTSSDS) within the proposed Variation with the identification of lands at Killumney Ovens and Monard as LTSSD sites with an acknowledgement that they will be developed over a timeline greater than a single development plan period. The Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) and Housing Growth Guidelines supports the identification of LTSSD sites.

Notwithstanding the above, the Office considers that clarity is required in relation to the information presented in the Core Strategy. The Office also notes that the proposed Variation does not include a Settlement Capacity Audit (SCA) and recommends that a SCA should be prepared to provide clarity in relation to the extent and serviceability of proposed land use zoning.

In relation to the population targets set out in the proposed Variation, it is important that these targets are aligned with any emerging policy arising from the forthcoming review of the Regional Spatial and Economic Strategy (RSES), which will give effect to NPO 3 and NPO 16 of the NPF, in accordance with the hierarchy of plans. While the Office recognises the practical challenges associated with this at the current time, it strongly advises the Planning Authority to engage directly with the Southern Regional Assembly (SRA) to agree an appropriate and coordinated approach.

In relation to the zoning of additional lands for residential development, the Office considers that the lands identified are generally well located and would support the strategic growth objectives of the County Development Plan. However, a small number of the proposed land use zonings included in the proposed Variation may lead to the coalescence of the Metropolitan Towns of Midleton and Carrigtwohill. These proposals should therefore be considered within the context of a strategic, coordinated approach to the growth of both settlements. The Planning Authority is advised to review this approach and to include a clear strategic objective within the County Development Plan that sets out the vision for, and management of, any actual or potential coalescence between the towns.

Furthermore, in relation to the proposed land use zonings, the Planning Authority should also ensure that the national roads objectives within County Cork are not undermined and that the anticipated benefits of the investment made in the national roads network are not jeopardised. The Planning Authority should undertake further engagement with Transport Infrastructure Ireland (TII) in relation to these matters.

The Office notes and welcomes the Planning Authority's continued commitment to adhere to the appropriate application of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) and Circular PL 02/2014 Flood Guidelines. The Office also welcomes Proposed Change No: VAR-01-11-02 which inserts new wording and a new table into the County Development Plan objective WM 11-14: Strategic Flood Risk Management to support the maintenance and development of existing and proposed Flood Relief Schemes infrastructure and defences in County Cork.

The Office does however have concerns in relation to specific aspects of the Strategic Flood Risk Assessment (SFRA) in particular the references to unmapped watercourses, consideration of future scenario climate change impacts and the lack of information relating

to Nature Based Solutions and Sustainable Urban Drainage Systems (SuDs). The Planning Authority is requested to address these by updating the SFRA.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out five (5) recommendations and three (3) observations under the following themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-
Proposed residential zoning objectives	Recommendation 2 and 3	-
Proposed rezoning based on RZLT process	-	Observation 1
Proposed population figures	-	Observation 2
Flood Risk Management	Recommendation 4	Observation 3
National Road Network	Recommendation 5	-

1. Implementation of the housing growth requirements

Based on the Housing Growth Guidelines, the Planning Authority has correctly stated the new housing growth requirement to 2034 for Cork County as 3,837 housing units per annum. It is noted that the Planning Authority has identified the headline year for the proposed Variation as 2034 and that it is proposed to extend the current County Development Plan. A baseline housing provision of 38,370 units for the period between Q1 2025 - Q4 2034 is identified. However, the housing growth requirements for the current plan period up to 2028 is not provided.

The Office notes from the Chief Executive's (CE's) Report dated 9th March 2026 that the remaining residentially zoned lands within the Main Towns and Key Villages over 1,500 population in the County Development Plan has capacity to deliver 16,446 housing units. The Office notes that this does not include other lower tier settlements within County Cork. Details relating to the quantum of available residential land within the current County Development Plan, extant planning permissions and details of the capacity of available residential land should be set out in the proposed Variation.

In terms of housing supply the proposed Variation table 2.5 identifies that the units from zoned sites in Main Towns and Key Villages over 1,500 population is 40,401 and that the units from all other key villages, villages and rural areas is 10,164 units. In combination this equates to 50,555 units. Table 2.5 identifies that the total estimated net area zoned in this plan (including additional provision) (ha) as 1,018ha. For clarity the Planning Authority should clearly set out the basis for the calculation of the proposed figures.

As identified in the Housing Growth Guidelines, the key focus of the proposed Variation should be to ensure that lands that are serviceable or most readily serviceable are prioritised for activation. Section 2.4 of the Housing Growth Guidelines indicates that planning authorities should undertake a SCA to identify zoned serviced/serviceable lands with residential development potential, specifying enabling infrastructure for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, schools provision and community facilities. The Office notes however that a SCA has not been prepared as part of this proposed Variation. This is also highlighted in the Strategic Environmental Assessment (SEA).

The Office therefore recommends a SCA is prepared for all additional lands proposed to be zoned for housing, including details of the site area (ha), housing capacity / yield (units), and infrastructure capacity/ constraints.

The Office also notes that in a number of instances the proposed new land use zoning is not clearly stated within the proposed Variation. As a result, it is unclear if the proposed use is residential or other land uses. The Planning Authority should therefore review and rectified these instances, ensuring that all proposed residential zonings are included in the SCA.

Recommendation 1 - Core Strategy Table and Settlement Capacity Audit

To ensure clarity within the core strategy, to support the co-ordinated and sustainable development of communities, and to 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 Objective 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
- NPO 101, NPO 102 and NPO 103 of the NPF to consider the serviceability of land zoned for development,

the Planning Authority is recommended to:

- (i) provide details relating to the quantum of available residential land within the current Cork County Development Plan 2022-2028, extant planning permissions and details of the capacity of available residential land;
- (ii) clarify the basis of the calculation of the figures set out in table 2.5 of the proposed Variation relating to the proposed housing supply figures and the total estimated net area zoned within the plan;
- (iii) provide a SCA which examines all settlements, across all levels of the settlement hierarchy/network of settlements within Cork County where new residential zoning are proposed, including details of the quantum of existing and proposed residential zoned land (ha), the area (ha) of each residential area/site, the potential housing yield (units), and density to be applied to each site/area, and infrastructure capacity/ constraints;
- (iv) clarify and identify the proposed land use zonings at the following locations, which are not stated in the proposed Variation:
 - a) Glandore Proposed Change Nos VAR-05-2.41-01 and VAR-05-2.41-02;
 - b) Rosscarbery Proposed Change No VAR-05-2.20-01;
 - c) Newcestown Proposed Change No VAR-05-1.20-01;
 - d) Inishannon Proposed Change No VAR-05-1.10-02;
 - e) Rylane/Seiscne Proposed Change Nos VAR-04-4.22-01 and VAR-04-4.22-02;

- f) Courtbrack Proposed Change No VAR-04-4.16-01 and VAR-04-4.16-02;
- g) Coachford Proposed Change No VAR-04-4.9-01;
- h) Shanagarry/Garryvoe Proposed Change No VAR-04-3.19.01;
- i) Killeagh Proposed Change Nos VAR-04-3.9-01 and VAR-4-.3.9-02;
- j) Whitechurch Proposed Change No VAR-04-2.16-01;
- k) Carrignavar Proposed Change No VAR-04-2.9-01 and VAR-04-2.9-02;
- l) Halfway Proposed Change No VAR-04-1.12-01;
- m) Barltemy Proposed Change No VAR-03-1.19-01;
- n) Castletownroche Proposed Change No VAR-03-1.10-01, and
- o) clarify the number of proposed zoning changes at Rylane/Seiscne, the map for proposed change no VAR-04-4.22-01 shows two sites which are not allocated reference numbers. The Planning Authority should clarify if these are part of the proposed Variation and if so, allocate a reference number to them, provide details of the proposed land use zoning change and where a residential use is proposed include the details within the SCA.

In relation to all of the proposed land use rezonings listed in part (iv), where a residential use is proposed it should be included within the SCA to be provided by the Planning Authority.

2. Proposed residential zoning objectives

The proposed Variation seeks extensive proposed rezonings throughout all of the settlement levels within Cork County including the Metropolitan Towns, Key Towns, Ring Towns, County Towns, key villages and villages.

The Office notes that in the majority of cases the Planning Authority has identified well located and proportionately scaled residential zoning changes within the existing settlement boundaries of key settlements within the County, such as the Metropolitan Town of Cobh, the Key Town of Clonakilty, the Ring Town of Youghal and the following County Towns: Charleville, Millstreet, Mitchelstown, Newmarket, Castletownbere, Dunmanway and Skibbereen. This approach is welcomed and accepted supporting the principle of compact growth.

Notwithstanding the above, in the absence of an SCA, the Office cannot fully assess the proposed residential land use zoning proposals from the service accessibility perspective at this stage, within the proposed Variation.

However, in relation to the proposed land use zoning proposals with the proposed Variation the Office has concerns in relation to circumstances where the proposed zonings extend beyond existing settlement boundaries and as a result could contribute to the potential for coalescence of existing settlements, such as the Metropolitan Towns of Midleton and Carrigtwohill.

In terms of the proposed land use rezonings at Midleton, while the Office acknowledges that a balance approached has been applied spatially to the proposed zonings around the settlement to the south and east the Office is concerned that the proposed zoning to the west including Proposed Change No MD-VAR-07 extends Midleton's settlements boundary to the west bringing it closer to the eastern settlement boundary of Carrigtwohill.

While NPO 83 specifically seeks to strengthen the value of greenbelts to prevent coalescence of settlements, it does envisage that such lands may be for the long-term strategic expansion of urban areas. The Planning Authority should therefore examine the spatial relationship between the settlement boundary to the western side of Midleton and the settlement boundary at the eastern side of Carrigtwohill.

While both settlements are acknowledged as rail-based settlements and the Office supports the principle of Transport Orientated Development, the Planning Authority should set out its strategic objective for the two settlements, the potential coalescence of these settlements and how it will be managed as well as details of how the identity of each individual settlement will be maintained.

Recommendation 2 - Coalescence of Settlements

Having regard to the strategic management of the balanced growth of the Cork metropolitan area, and having considered the following:

- NPO 8 of the NPF relating to the delivery of new homes within the built-up footprint of existing settlements and ensure compact growth and sequential patterns of growth;

- RPO 10 and RPO 35 of the RSES relating to the delivery of compact growth;
- NPO 83 to strengthen the value of greenbelts and prevent coalescence of settlements;
- NPO 10 to deliver transport oriented development at scale at suitable locations;

the Office recommends that the Planning Authority:

- (i) set out a strategic objective and vision in terms of the coalescence or potential coalescence of Midleton and Carrigtwohill, how it will be managed and how each settlement will maintain its individual identity.

Separately, there is also concern relating to the scale of proposed land use zoning changes beyond the settlement boundaries at Carrignavar and Glandore.

At Carrignavar there are two proposed land use zonings beyond the settlement boundary and the CSO built up area, and in each case the proposed land use have not been identified. Both areas of land result in leapfrogging undeveloped lands within the settlement boundary and, in the case of Proposed Change No VAR-04-2.9-01 would result in the village becoming excessively linear in nature, inconsistent with its traditional character and form. The settlement is well established with services and community facilities, and future development should support the consolidation of the settlement through appropriated scaled development that maintains the character of the village. Recognising the need for development options within the village, the Planning Authority should therefore identify alternative lands within the settlement boundary, close to the centre of the settlement that could be zoned in the place of Proposed Change Nos VAR-04-2.9-01 and VAR-04-2.9-02.

A further example is noted at Glandore where Proposed Change No VAR-05-2.41-02 is at a peripheral location outside the settlement boundary. While the Office accepts that there maybe a rationale for a zoning VAR-05-2.41-01 which is located adjacent to existing housing, VAR-05-2.41-02 would extend the built-up form into the open countryside. It is recommended therefore that the Planning Authority should identify alternative lands within the settlement boundary, closer to the centre of the settlement that could be zoned in the place of VAR-05-2.41-02.

Recommendation 3 - Compact and sustainable growth of Carrignavar and Glandore

Having regard to the compact and sequential growth of the villages of Carrignavar and Glandore, and having considered:

- NPO 7 of the NPF to ensure compact growth and sequential patterns of growth;
- RPO 10 and RPO 35 of the RSES relating to the delivery of compact growth;
- the policy and objectives of the Development Plans, Guidelines for Planning Authorities (2022) that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently;

the Office recommends that the Planning Authority:

- (i) omit Carrignavar Proposed Change No VAR-04-2.9-01 and review alternative options for land use zonings within the settlement or close to the settlement centre; and
- (ii) omit Glandore Proposed Change No VAR-05-2.41-02 and review alternative options for land use zonings within the settlement or close to the settlement centre.

3. Proposed rezoning based on RZLT process

The proposed Variation includes land use zoning changes which the Planning Authority has indicated arise from the RZLT process. This applies to nine sites currently zoned for residential or existing residential/mixed residential and other use zonings within four settlements: Fermoy, Mitchelstown, Charleville and Buttevant. The proposals would result in these sites being rezoned for agricultural use. The CE's Report identifies that the RZLT lands which are the subject to the proposed changes are to be replaced under the variation by a similar quantum of appropriate lands within the settlements.

The recently published housing plan, Delivering Homes, Building Communities 2025-2030, also emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

While the Office acknowledges that the proposed RZLT rezonings from residential uses to agriculture are not located within the higher-level tier settlements in County Cork, nevertheless it is noted that the RZLT sites are located within the settlement boundaries and some of them are centrally located close to town centres, adjoining existing residential developments. On that basis it is advised that the Planning Authority keep these sites under review as they could contribute to the delivery of compact growth

Observation 1 - RZLT rezoning at Fermoy, Mitchelstown, Charleville and Buttevant

Having regard to the compact and sustainable growth of the settlements within Cork County and in particular to:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- NPF Implementation: Housing Growth Requirements (2025),

the Office advises that the Planning Authority keep the nine Residential Zoned Land Tax locations within the settlements of Fermoy, Mitchelstown, Charleville and Buttevant under review as potential locations for residential uses in the future.

4. Proposed population figures

The Planning Authority is advised to engage directly with the SRA in relation to the proposed population targets for Cork County. The next review of the County Development Plan will have to be consistent with the revised RSES which will be published in advance of the County Development Plan. Work on the revised RSES is ongoing and it will need to be prepared in compliance with the population figures set out in the NPF. The Planning

Authority should therefore re-examine and make revisions to the proposed population figures to promote and alignment as much as possible with the RSES.

Observation 2 - Compliance with the RSES and the NPF

Having regard for the need to comply with the Regional Spatial and Economic Strategy (RSES), the emerging RSES and the National Planning Framework First Revision (2025) (NPF) the Planning Authority is advised to engage directly with the Southern Regional Assembly in relation to the proposed population targets for Cork County set out in the proposed Variation in order to ensure alignment with the RSES, the review of the RSES and the NPF.

5. Flood Risk Management

National Policy Objective (NPO) 78 of the NPF requires planning authorities to apply an evidence-based approach to flood risk management, ensuring that flood risk is appropriately identified, avoided and mitigated in accordance with the Flood Guidelines. Furthermore, NPO 78 of the NPF requires planning authorities to take account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.

The SFRA identifies that there are unmapped watercourses associated with six areas which are the subject of rezoning proposals at:

- Rathcormack Proposed Change No VAR-03-1.7-04;
- Mallow Proposed Change No MW-VAR-05;
- Carrigaline Proposed Change No CL-VAR-08;
- Killumney-Ovens Proposed Change No KO-VAR-02;
- Newcestown Proposed Change No VAR-05-1.20-01; and
- Bantry Proposed Change No BT-VAR-01.

The Flood Guidelines set out a three Stage Flood Risk Assessment process for Planning Authorities to identify whether flood risk may exist, the degree to which it is an issue, and what assessment to a scale proportionate to the risk should then be carried out.

Where unmapped watercourses occur, a stage 1 assessment would indicate a potential source of flooding that may warrant further investigation. A stage 2 appraisal of the adequacy of existing information might indicate that there is sufficient information available to either assess that fluvial risk is not present (e.g. a surface water feature misclassified as a watercourse), or that fluvial risk is present and that there is sufficient information available to assess and classify the level of risk (e.g. evaluation of site-specific flood risk assessments accepted by Cork County Council for the area provides sufficient information for the establishment of flood zones). If, however, assessment indicates risk is present, but insufficient information is available to establish flood zones, a stage 3 detailed flood risk assessment may be required.

Therefore, in this instance, the Planning Authority should review if stage 3 flood risk assessments are required under the Flood Guidelines to inform the proposed land use zonings and the SFRA for the six proposed land use zoning areas/sites where unmapped watercourses have been identified. Where relevant, lands that do not pass the Development Plan Justification Test should not be zoned for highly vulnerable (Flood Zone A) or less vulnerable development (Flood Zone B).

In addition, while the Office welcomes the inclusion of the climate change future scenario flood risk in relation to four of the proposed land use zoning changes, the planning authority is encouraged to update the SFRA to deal with the future scenario flood extents at the plan making stage (by carrying out flood risk assessment to an appropriate level of detail and amended zoning objectives as necessary) rather than deferring the matter to development management. In this respect, lands at Carrigaline Proposed Change No (CL-VAR-06), Glounthaune Proposed Change No (GN-VAR-03), Carrigtwohill Proposed Change No (CT-VAR-01) and Mallow Proposed Change No (MW-VAR-05) have been identified as a risk under a future scenario, and the OPW has also identified that future scenario risks apply to Little Island (Proposed Change No LI-VAR-01) and Middleton (Proposed Change No MD-VAR-06).

The Office also advises that the Planning Authority should also take account of Nature Based Solutions and SuDs within the SFRA.

In relation to Proposed Change No VAR-01-18-06 which proposes to insert Developer Led Infrastructure/Bridging Infrastructure and ESB sub stations as 'appropriate uses' within a range of land uses including agriculture and green infrastructure. The Local Authority

should review the proposed uses or any alternatives in the context of the Flood Guidelines in terms of flood risk and update the SFRA.

While the Office fully acknowledges the importance of establishing a clear and robust policy framework to facilitate the delivery of essential infrastructure including wastewater and water, it is imperative that any such provision is fully consistent with national and regional policy. In particular, development facilitated through the development plan must demonstrably ensure that risks to people, property, and the environment arising from flooding are managed in accordance with the Flood Guidelines.

Any zoning or objective that facilitates new highly vulnerable development within areas identified as at risk of flooding must be supported by the application of the Justification Test, with all criteria set out in Box 4.1 of the Flood Guidelines clearly satisfied.

Recommendation 4 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 116 of the RSES relating to the planning system and flood risk management which identifies that consideration must be given to future appropriate land use policies in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) review if stage 3 flood risk assessments are required to inform the land use zonings and the Strategic Flood Risk Assessment (SFRA) in relation to the following area, and amend the SFRA where required:
 - a) Rathcormack Proposed Change No VAR-03-1.7-04;
 - b) Mallow Proposed Change No MW-VAR-05;

- c) Carrigaline Proposed Change No CL-VAR-08;
 - d) Killumney-Ovens Proposed Change No KO-VAR-02;
 - e) Newcestown Proposed Change No VAR-05-1.20-01;
 - f) Bantry Proposed Change No BT-VAR-01,
- (ii) review the flood risk implications of proposed change no VAR-01-18-06 and updated the SFRA accordingly; and
- (iii) in the case of both (i) and (ii) above ensure that lands that do not pass the Plan Making Justification Test should not be zoned for highly vulnerable (Flood Zone A) or less vulnerable development (Flood Zone B).

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Observation 3 - Future flood risk scenarios and SuUDs

Having regard to flood risk management, and having considered the following:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 116 of the RSES relating to the planning system and flood risk management which identifies that consideration must be given to future appropriate land use policies in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office advises that the Planning Authority:

- (i) amend the Strategic Flood Risk Assessment (SFRA) to set out how climate change is to be managed on lands not currently at risk of flooding but could

potentially be at risk in the future as shown in the future scenario flood extents in relation to the following areas:

- a) Carrigaline Proposed Change No CL-VAR-06;
 - b) Glounthaune Proposed Change No GN-VAR-03;
 - c) Carrigtwohill Proposed Change No CT-VAR-01;
 - d) Mallow Proposed Change No MW-VAR-05;
 - e) Little Island Proposed Change No LI-VAR-01; and
 - f) Middleton Proposed Change No MD-VAR-06;
- (ii) incorporate Nature Based Solutions and Sustainable Urban Drainage Systems within the SFRA.

6. National Road Network

Significant road upgrades and improvements are planned and proposed in Cork County which will be highly significant in terms of the economic and social functioning of the area. It is critical therefore that such measures are supported and aligned with land use zoning to ensure that conflicts are avoided. The Office has identified a number of instances where potential conflicts may arise which should be reviewed and resolved prior to the adoption of the variation. Engagement with TII is advised as part of this process.

Recommendation 5 - 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, and having considered the following:

- Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines);
- RPO 140 of the RSES (maintaining the strategic capacity and safety of the national roads);

- RPO 151 of the RSES (the protection of the strategic transport function of national roads);
- RPO 166 relating to Strategic inter regional multi modal connectivity to Metropolitan Area and Economic Corridors;
- RPO 167 relating to National Roads Projects;
- Cork Metropolitan Area Spatial Plan (MASP) Policy Objective 9 relating to the Strategic Road Network Improvements;
- Objective TM 12-1 of Cork County Development Plan 2022-2028 (County Development Plan) relating to the integration of land use and transport which identifies that the strategic transport functions of national roads will be maintained and protected in accordance with national policy; and
- Objective TM 12-13 of County Development Plan relating to the National Regional and Local Road Network.

the Planning Authority is recommended to:

- (i) review proposed land use zonings at Midleton and potentially omit elements of Proposed Change Nos MD-VAR-01, MD-VAR-07, MD-VAR-10, MD-VAR-14, MD-VAR-15, MD-VAR-16 and MD-VAR-17 which would undermine the N25 Carrigtwohill to Midleton upgrade project;
- (ii) review the proposed change no CT-VAR-02 at Carrigtwohill to ensure compatibility with the delivery and implementation of the N25 Carrigtwohill to Midleton Upgrade Scheme;
- (iii) review Proposed Change No CL-VAR-09 at Carrigaline, where parts of proposed change overlay the M28 reservation, this should be omitted from the proposed Variation;
- (iv) omit part of Proposed Change No CL-VAR-01 at Carrigaline which proposes to delete part (b) of Fernhill Urban Expansion Special Policy Area CL-X-01 which states 'the provision of adequate separation distance from the M28';
- (v) review Proposed Change Nos MW-VAR-02, MW-VAR-06, MW-VAR-08 at Mallow to ensure compliance with the National Roads Guidelines to ensure

road safety, managing access and intensification of access to national roads and guarding against proliferation of roadside development;

(vi) Proposed Change No WM-VAR-08 at Mallow should be reviewed and adjusted so that it does not include any lands to be acquired for the N72/N73 Mallow Relief Road scheme;

(vii) review Proposed Change No WM-VAR-01 and MW-VAR-11 at Mallow in the context of the N72 junction and the N20 Annabella Roundabout;

(viii) review Proposed Change No RY-VAR-01 at Ringaskiddy and adjust this so that it does not include any lands within the M28 reservation; and

(ix) ensure that the Proposed Change No CV-VAR-04 and CV-VAR-05 at Charleville provide the proposed pedestrian/cycle connectivity shall occur with or in advance of any residential occupancy in the interest of road user safety.

The Planning Authority should engage with the Cork National Roads Office and Transport Infrastructure Ireland in relation of the above.

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 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes to address them.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the variation. Where an authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan

as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

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.

Is mise le meas,

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A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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