



# Cork County Development Plan Review

## Section 12(8) Chief Executive's Report

*Volume Two: Part 1  
Submissions on the Proposed  
Amendments to the Draft Plan –  
Response and Recommendations  
Volumes One and Two of the Draft  
Plan*

*16th March 2022*



Comhairle Contae Chorcaí  
Cork County Council



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# 1 Chapter 1 Introduction

There were no specific submissions attributed to Chapter 1 Introduction.

## 2 Chapter 2 Core Strategy

<b>Interested Party</b>	<b>Andrew Sullivan</b>
<b>Ref. No.</b>	PADP400089737
<b>Proposed Amendment No.</b>	Core Strategy Chapter N/A Tourism Chapter: 1.10.4 Transport and Mobility Chapter: 1.12.48
<b>Submission Summary</b>	<p>This submission requests that the Lee to Sea Greenway be given its own specific objective in line with the Lee to Sea Greenway objectives in the RSES and CMATS. This, the submission argues will help to support future national funding from the NTA on the feasibility route selection and phased delivery. The submission outlines the importance of this Greenway from an active and safe travel point of view, as well as providing a significant economic and tourism draw and notes the success of the Waterford and Limerick Greenways.</p> <p>The submission requests that the Cork County Development Plan 2022-2028 should identify the Flagship Lee to Sea Greenway within the Core Strategy as a strategic commuter and active travel route and as a key carbon mitigation measure and tourism asset. The submission also requests that a specific Lee to Sea Greenway objective should be included as a short to medium term deliverable, to be supported by a feasibility study for the entire route and supported by the NTA and other stakeholders and should be supported by criteria including; universal design, segregated routes, including nodes of interest and future proof the greenway to accommodate growth up to 2040 and beyond.</p>
<b>Chief Executive's Response</b>	<p>While there is no Proposed Amendment in the Core Strategy Chapter which can facilitate this request at this stage of the process Proposed Amendment 1.12.48 which promotes objective TM 12.2.6 to Deliver the Cork Harbour Greenway, a component of the Lee to Sea Greenway, subject to environmental assessment. The Planning Authority fully recognises the advantages of greenways in supporting active travel, CMATS recognises the Ballincollig to Crosshaven section of the 'Lee to Sea' route as a short to medium term project and the RSES also identifies this as a transport priority for Metropolitan Cork. CMATS identifies the western section of the 'Lee to Sea' route, from Inniscarra to Ballincollig, is a longer-term project as part of the secondary cycle network. Further studies are needed to assess the feasibility of the route. As noted in the Chapter 12 Transport and Mobility, the development of greenway strategy for the County is needed to guide consideration and prioritisation of future greenway development. In this context, Proposed Amendment 1.10.4 proposes to remove the reference to the 'Lee to Sea' as a long-term project in paragraph 10.12.10 of Chapter 10 of the Draft Plan.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendments 1.10.4 and 1.12.48 with No Modifications
<b>Interested Party</b>	<b>Carol Harpur</b>
<b>Ref. No.</b>	PADP400772237
<b>Proposed Amendment No.</b>	Proposed Amendment 1.2.13 Core Strategy Table

<b>Submission Summary</b>	This submission requests that the Table 2.x Cork County Core Strategy Table, is amended to move Castlemartyr from the category of 'small town County Cork MASP' to the category of 'small town County excluding Cork MASP', to ensure accuracy and consistency throughout the development plan.
<b>Chief Executive's Response</b>	The point made in this submission is welcomed and a minor modification will be made to the Table prepared under Proposed Amendment 1.2.13 to implement this request.
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.2.13 with Minor Modification. * See Section 1.2 of Volume One Part 2 of this report for details of the Modification.
<b>Interested Party</b>	<b>Cork Chamber</b>
<b>Ref. No.</b>	PADP401333927
<b>Proposed Amendment No.</b>	This submission references unspecified amendments in Volume One Chapters 2, 3, 4, 8, 9, 10 and 12
<b>Submission Summary</b>	<p>This submission makes a number of comments under the following headings;</p> <p><b>Climate</b> The submission commends the focus on the Climate Act 2021, the Paris Agreement and the Climate Action Plan and commend the stronger emphasis on biodiversity, energy and flood resilience required to ensure that the goals are met and exceeded.</p> <p><b>Housing</b> The submission notes that the concept of “additional provision” is important as the commercial reality is that zoning for the precise volume of housing required in no way mitigates against the risk of sites not being brought to market, or any other number of barriers to delivery including water infrastructure constraints (Midleton and Aghada mentioned in particular). The submission notes the detail in Appendix D setting out the investment levels required to deliver on key sites and the submission also states that the Council must take every conceivable step to meet brownfield targets and that Government must step up in this regard to assist both in terms of funding and viability.</p> <p><b>Energy</b> The submission welcomes the support for technologies such as hydrogen and wind energy and also notes that generation technologies from solar to onshore and offshore wind, anaerobic digestions, energy recovery, tidal, and storage options such as hydrogen and battery should all be catered for in an appropriate manner.</p> <p><b>Retail</b> The submission notes that the proposed amendments contain a high level of detail in relation to a proposed retail development in Carrigtwohill and note that it is essential that the impact of this proposed single use, car dependent typology is carefully considered. The submission notes that the regeneration of urban centres and supporting local business is a universally accepted priority and that it cannot be a desirable legacy for Cork to have any further sprawling exurban retail outlets adding to those already in place.</p> <p><b>Foreign Direct Investment and Indigenous Enterprise</b> The submission notes that the ongoing strategic employment designation of lands at Ringaskiddy, Carrigtwohill/ Ballyadam and Little Island are essential but also notes that these destinations suffer from varied and unacceptable levels of transport constraints. The submission in noting that the use of Kilbarry may change to residential over the lifetime of the plan suggests that new sites must be sought for the wider metropolitan region and made</p>

	<p>available for investment. The submission also suggests that the plan should offer a policy context for the exploration of and establishment of new sites for large scale employment and industrial use, as existing sites may not be enabled in a timely manner.</p> <p><b>Transport &amp; Mobility</b></p> <p>The submission states that there is much in the plan to celebrate from the recurring theme of the ten-minute town to repeated emphasis of cycle and pedestrian infrastructure. The submission proposes that in addition to the delivery of CMATS, that an emphasis on inter county connectivity supporting the onward connectivity of the Middleton-Youghal Greenway onwards to Dungarvan and also linking Ireland’s Ancient East to the Wild Atlantic Way. The submission notes the priorities within the road network and the complex interdependencies that these investments unlock mentioning specifically the M20 corridor, the M28 and the N25 and also the development of ring roads that can take regional traffic out of towns such as Killeagh and Castlemartyr. The submission also mentions Little Island noting that the continued rollout of mixed mode infrastructure is strongly encouraged and essential to continued growth and talent attraction. The submission requests that all rail upgrades are facilitated and supported, from new stations to dual track upgrades and electrification. The submission supports the provision of transport options so that people living and visiting Cork are not consigned to the car at every turn.</p> <p><b>Urbanism</b></p> <p>The submission welcomes the multiple references to concepts from linear parks to footpaths and cycleways, and the other eclectic blend of amenities and facilities required to make town attractive. The submission requests that urban areas be audited for placemaking attributes and that a workplan be put in place for each urban area to make them safer, and more enjoyable spaces for people of all ages and not just for people who are driving cars.</p>
<b>Chief Executive's Response</b>	<p>While this submission does not directly reference any particular amendment the support for the different themes, for example Climate Action (Proposed Amendment 1.1.1) Additional Residential Provision (Proposed Amendment 1.2.10, 1.2.11) Appendix D (Setting out the Residential Land and NPF Tiering with a CBA) (Proposed Amendment 1.2.20) Renewable Energy (Proposed Amendments 1.8.10, 1.13.2, 1.13.3, 1.13.11, 1.13.12, 1.13.13, 1.13.16, 1.13.19, 1.13.20, 1.13.23, 1.13.31) Transport Mobility and Urbanism (Proposed Amendments 1.12.34, 1.12.54, 1.12.56, also regarding Infrastructure Costs and Funding as set out in Chapter 19 Proposed Amendment 1.19.3) as welcomed by the Planning Authority. The comments regarding the policy context for Large Scale Employment and Industrial Uses, it is considered that the Plan provides guidance on this issue both in relation to the Economic Strategy for the County (in Chapter 2, Core Strategy) and also in relation to ‘Strategic Employment Locations’ (Chapter 8, Economy). The comments regarding the role of the Retail Outlet Centre (Proposed Amendment 1.9.20) are noted.</p>
<b>Chief Executive's Recommendation</b>	No Further Action Required.
<b>Interested Party</b>	<b>Cork CS/BW international group</b>
<b>Ref. No.</b>	PADP401445300
<b>Proposed Amendment No.</b>	<p>The submission strongly supports the following Proposed Amendments: No. 1.12.15, No. 1.12.49, No. 1.12.22, No. 1.4.11, No. 1.2.2, No. 4.2.4.7, and No. 4.2.8.2.</p> <p>The submission also sets out the amendments which it considers will detract from the quality of life and the ability of County Cork to attract the talent it</p>



	needs to succeed socially and economically as follows No.1.4.5, No. 1.4.6, No 1.4.7, No 1.4.10, No. 1.9.20, No 4.2.3.41, and No. 4.2.3.43.
<b>Submission Summary</b>	<p>This submission is from the Cork CS/BW group who primarily represents those new to Cork who have arrived to study or work in major multinational companies, pharmaceutical IT etc. as well as in local businesses. The submission states that the biggest impediment to the excellent quality of life in Cork is the lack housing close to employment retail and leisure opportunities and the poor public transport infrastructure. The submission states that both of these problems are intimately intertwined with low density dispersed nature of residential but also retail and employment development and the submission argues that this is the number one impediment to recruiting and retaining high quality mobile international talent to Cork and Ireland which maintains and draws international investment to the cork region.</p> <p>The submission strongly supports the following Proposed Amendments: No. 1.12.15, No. 1.12.49, No. 1.12.22, No. 1.4.11, No. 1.2.2, No. 4.2.4.7, and No. 4.2.8.2.</p> <p>The submission also sets out the amendments which it considers will detract from the quality of life and the ability of County Cork to attract the talent it needs to succeed socially and economically as follows: No.1.4.5, No. 1.4.6, No 1.4.7, No 1.4.10, No. 1.9.20, No 4.2.3.41, and No. 4.2.3.43.</p>
<b>Chief Executive's Response</b>	<p>The support for Proposed Amendments No. 1.12.15, No. 1.12.49, No. 1.12.22, No. 1.4.11, No. 1.2.2, No. 4.2.4.7, and No. 4.2.8.2. is welcomed. Regarding the Proposed Amendments where the submission is not in support of the amendments No.1.4.5, No. 1.4.6, No 1.4.7, No 1.4.10, No. 1.9.20, No 4.2.3.41, and No. 4.2.3.43. It is noted that these amendments relate to two central issues, density and the proposed update regarding the retail outlet centres. See the Response and Recommendation in Volume One, Part One: Section 2.2 (and 4.3 where relevant) which deals with these Key Issues.</p>
<b>Chief Executive's Recommendation</b>	<p>See the Response and Recommendation in relation to this issue in Volume One, Part One: Section 2.2 (and 4.3 where relevant) which deals with these Key Issues.</p>
<b>Interested Party</b>	<b>Martin O'Leary</b>
<b>Ref. No.</b>	PADP401273356
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	<p>This submission relates to Villages and Village Nuclei without development boundaries. The submission raises the following issues:</p> <ul style="list-style-type: none"> <li>• Omission of draft LAP for Rathbarry and other similar sized settlements is a backward step for the County Development Plan;</li> <li>• Growing demand to live in such settlements and applicants may not satisfy local qualifications criteria;</li> <li>• Perceived lack of real demand for housing development at lower level of settlement network is outdated;</li> <li>• No reason why potential demand cannot be provided with suitable design that respects the distinctive individuality of settlements</li> <li>• Additional wording should be added to rural criteria for these smaller settlements allowing for applicants in these settlements not to be required to meet Rural Housing Need criteria.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission does not relate specifically to any Proposed Amendment and therefore while the issues raised are noted, they cannot be considered further at this stage</p>

<b>Chief Executive's Recommendation</b>	No Further Action Required
<b>Interested Party</b>	<b>Office of the Planning Regulator</b>
<b>Ref. No.</b>	PADP401442155
<b>Proposed Amendment No.</b>	7 Recommendations leading to a number of Proposed Amendments
<b>Submission Summary</b>	Please refer to: Section 2.2 of Volume One, Part One.
<b>Chief Executive's Response</b>	Please refer to: Section 2.2 of Volume One, Part One.
<b>Chief Executive's Recommendation</b>	Please refer to: Section 2.2 of Volume One, Part One.
<b>Interested Party</b>	<b>Southern Regional Assembly</b>
<b>Ref. No.</b>	PADP401372742
<b>Proposed Amendment No.</b>	Proposed Amendment 1.1.1, 1.21.2 Proposed Amendment 1.2.3, 1.2.6, 1.2.9, 1.2.13, 1.2.11, 1.2.12, 1.2.20 Proposed Amendment 1.3.4, 1.3.7, 1.3.9, 1.3.10, 1.3.11, 1.3.15, 1.3.12 Proposed Amendment 1.4.1, 1.4.2 and 1.4.10 Proposed Amendment 1.5.7 Proposed Amendment 1.6.5 to 1.6.9 Proposed Amendment 1.6.11 and 1.6.13 Proposed Amendment 1.7.8 to 1.7.10 Proposed Amendment 1.8.3, 1.8.6, 1.8.7, 1.8.8, 1.8.11, 1.8.17, 1.8.18 Proposed Amendment 1.9.5, 1.6.15, 1.9.21, 1.9.16 Proposed Amendment 1.10.18 Proposed Amendment 1.11.1, 1.11.7 Proposed Amendment 1.12.1, 1.12.14 to 1.12.18, 1.12.19, 1.12.25, 1.12.26, 1.12.34, 1.12.39, 1.12.50, 1.12.52, 1.12.54, 1.12.55, 1.12.61 Proposed Amendment 1.13.1, 1.13.8, 1.13.9, 1.13.20, 1.13.22, 1.13.32 Proposed Amendment 1.14.3, 1.14.9, 1.14.21 Proposed Amendment 1.15.1, 1.15.8, 1.15.10, 1.15.14 Proposed Amendment 1.16.4, 1.16.6, 1.16.15, 1.16.27, 1.6.30, 1.16.31 Proposed Amendment 1.17.2 Proposed Amendment 1.18.1, 1.18.2, 1.18.4, 1.18.5, 1.18.14 Proposed Amendment 1.19.5
<b>Submission Summary</b>	Please refer to: Section 2.3 of Volume One, Part One.
<b>Chief Executive's Response</b>	Please refer to: Section 2.3 of Volume One, Part One.
<b>Chief Executive's Recommendation</b>	Please refer to: Section 2.3 of Volume One, Part One.
<b>Interested Party</b>	<b>Construction Industry Federation</b>
<b>Ref. No.</b>	PADP401337641
<b>Proposed Amendment No.</b>	Proposed Amendment No. 1.2.12 Proposed Amendment No. 1.18.1 Proposed Amendment No. 1.18.2 and Proposed Amendment No. 1.2.4

<b>Submission Summary</b>	<p>The main area of concern as highlighted in the submission is the significant reduction in the quantum of zoned residential development land. This the submission argues, together with an increased density requirement and a focus on infill/brownfield sites and with an absence of any structural incentives, or initiatives to increase the viability of such development will result in a deepening of the current housing crisis.</p> <p>The submission welcomes the position of the Amended Draft to retain a supply of Residential Reserve lands, which allows these lands to be considered from the beginning of year four of the Plan and states that it is vital that this provision is retained in the adopted Plan.</p> <p>The submission also welcomes the Council's commitment to Active Land Management and while it is noted that no amendment to the Draft Plan was proposed in response to this issue, the submission further emphasizes the importance of Active Land Management by the Planning Authority to avoid any shortage of land suitable for residential use arising during the lifetime of the development plan.</p> <p>The submission requests a review of all metrics in the Housing Needs Demand Assessment to ensure that the Core Strategy reflects emerging needs and sets out a number of metrics which it considers are critical to the 2-year review and progress report, from updated population projections, and commencement notices for residential development, planning application data, to house prices and rental levels, zoned residential land prices and the extent to which infill and brownfield sites are being brought forward.</p> <p>The submission states that the County Council should be prepared to undertake a variation of the County Development Plan at the 2-year review period to provide for additional residential zoned land, if there is any evidence of the shortage in housing supply continuing or deepening.</p>
<b>Chief Executive's Response</b>	<p>The Planning Authority notes the comments made in this submission, particularly regarding the importance of Active Land Management and the review of the metrics used to calculate the HNDA within the context of the preparation of the 2 Year Progress Report.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendments 1.2.4, 1.2.12 and 1.18.1 and 1.18.2 with No Modifications</p>

## 3 Chapter 3 Settlements and Placemaking

There were no specific submissions attributed to Chapter 3 Settlements and Placemaking.

## 4 Chapter 4 Housing

<b>Table 1.4</b>	<b>Chapter Four Housing</b>
<b>Interested Party</b>	<b>Carol Harpur</b>
<b>Ref. No.</b>	PADP400575617
<b>Proposed Amendment No.</b>	1.4.4 and 1.4.6
<b>Submission Summary</b>	<p>This submission relates to Chapter 4 – Housing. The summary raises the following issues:</p> <ul style="list-style-type: none"> <li>• In light of the OPR’s comments (Recommendation No. 7 – Residential Density), the inclusion of Glounthaune, a Key village, in Table 4.1: Settlement Density Location Guide, should be reviewed to align 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.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission does not support the change set out in Proposed Amendments 1.4.4 and 1.4.6 and requests that the inclusion of Glounthaune in Table 4.1 – Settlement Density Location Guide be reviewed in light of the Office of the Planning Regulator’s comments (Recommendation No.7).</p> <p>Glounthaune is a town with proposed high quality Public Transport Corridor Potential and is projected to have population growth to over 1500 population during the course of this Plan period. For these reasons, it has been included in Table 4.1 as being appropriate for high density development in the town centre area of the settlement.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendment 1.4.4 with No Modification          Adopt Proposed Amendment 1.4.6 with No Modification</p>
<b>Interested Party</b>	<b>Travellers of North Cork</b>
<b>Ref. No.</b>	PADP401348006
<b>Proposed Amendment No.</b>	1.4.9
<b>Submission Summary</b>	<p>This submission relates to Proposed Amendment 1.4.9 is noted but specific recommendations for the County Development Plan should include the following:</p> <ul style="list-style-type: none"> <li>• Traveller specific accommodation developments completed under the last Development Plan period should be outlined in the Development Plan;</li> <li>• Range and type of housing required and land use aspects of Traveller Accommodation Programme should be incorporated into Development Plan as per National Guidelines (Section 4.56 of Development Plans: Planning Guidelines for Planning Authorities, 2007);</li> <li>• Projects committed under the 2019-2024 Traveller Accommodation Plan along with zoning objectives for Traveller specific accommodation, transient accommodation should be spatially defined. The legislation requires that a Development Plan shall include objectives for: ‘The provision of accommodation for Travellers, and the use of particular areas for that purpose.’</li> <li>• There has been no identification for the need for one off rural housing in the Cork County Council Traveller Accommodation Programme 2019-2024;</li> <li>• Consideration should also be given for how sites will be identified for Traveller Specific Accommodation in the next Traveller Accommodation Programme, including transient sites;</li> <li>• The provisions outlined in the County Development Plan should be monitored</li> </ul>

	<p>and reviewed at regular intervals.</p> <ul style="list-style-type: none"> <li>• Development Plans should ensure that they counteract undue segregation. Sites identified for Traveller specific accommodation should be well located, close to key amenities, and chosen in consultation with the community and should include sufficient green areas and children’s play areas.</li> <li>• All developments should be carried out with consultation at every stage of the process, with prospective residents, local Traveller organisations and with the Local Traveller Accommodation Consultative Committee.</li> <li>• The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to reduce the overrepresentation of Travellers in homeless figures including hidden homelessness (chronic overcrowding, or without basic facilities of their own, or security of tenure).</li> <li>• Baseline data on Traveller accommodation should form part of the Housing Needs Demand Assessment.</li> <li>• Consider how future Development Plans could have their timelines aligned with the timelines of Traveller Accommodation Plans, for a more integrated approach, in line with the recommendations of the Expert Review on Traveller Accommodation.</li> <li>• Reference should be made to the Expert Review on Traveller accommodation and commit to incorporating the decisions and work of the programme in future processes.</li> <li>• Reference should be made to the Council’s strategy to implement the relevant recommendations of the recent Irish Human Rights &amp; Equality Commission Equality Review on the provision of Traveller accommodation in the Cork County area.</li> <li>• Eliminating Energy Poverty in Traveller Specific Accommodation. Providing clean affordable energy, and energy efficient homes in Traveller specific accommodation.</li> <li>• Review existing Traveller specific accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency of the dwellings and in terms of access to sustainable energy sources.</li> <li>• All planned Traveller specific accommodation should seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems as well as meeting near zero energy building (NZEB) requirements under current regulatory requirements.</li> </ul>
<b>Chief Executive's Response</b>	See Response to Office of the Planning Regulator Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.
<b>Chief Executive's Recommendation</b>	See Recommendation to Office of the Planning Regulator Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report
<b>Interested Party</b>	<b>The Atlantic View Residents Association (AVRA)</b>
<b>Ref. No.</b>	PADP401683672
<b>Proposed Amendment No.</b>	1.3.13
<b>Submission Summary</b>	<p>This submission relates to Chapter 3 – Settlements and Placemaking and Chapter 4 – Housing and Proposed Amendment 1.3.13. The submission raises the following:</p> <ul style="list-style-type: none"> <li>• Amendments do not adequately reflect requirements of National Planning Framework in relation to the protection of green spaces. It raises concern in relation to Cork County Council’s record in relation to protection of green areas and the communities who use them;</li> <li>• Concern in relation to lack of balanced representation on the Strategic Policy Committee;</li> <li>• Developer Friendly Culture – no sectoral representatives on the Strategic Policy Committee which is unacceptable and should be rectified immediately;</li> </ul>

	<ul style="list-style-type: none"> <li>• The Importance of our public spaces – planning history shows non-compliance with HOU 14-1 and HOU 14-2 of 2003 County Development Plan;</li> <li>• Requests support in ensuring that land granted open space access remain to be enjoyed by all the community;</li> <li>• Highlights the issues regarding the illegal development of public open access areas.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission requests a change to Proposed Amendment 1.3.13 to provide for additional wording to adequately reflect the requirements of national policy as set out in the National Planning Framework to protect the public realm and amenity green spaces.</p> <p>Chapter 4 Housing and Chapter 14 Green Infrastructure and Recreation includes a number of policies and objectives relating to public open spaces including Green Infrastructure Objectives for our towns and villages while Chapter 3 Settlements and Placemaking highlights the importance of placemaking and public realm. It is considered that this issue has been sufficiently addressed within the Draft Plan. The remainder of the issues raised are not relevant to Proposed Amendments and are considered for the most part of the Operational and /or Development Management Matters.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.3.13 with No Modification.
<b>Updated Draft Joint Housing Strategy and HNDA</b>	
<b>Interested Party</b>	<b>Drew Fox</b>
<b>Ref. No.</b>	PADP400884516
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	This submission requests that the planning authority should mandate the reduction of the carbon footprint in housing construction. The submission states that a masonry/concrete built house releases 40% more carbon in the construction phase than a wood frame dwelling and that if Cork County Council set a target of 50% wood frame new builds by 2028 it would become a leader in environmental building standards in Ireland.
<b>Chief Executive's Response</b>	This submission does not relate specifically to any specific Proposed Amendment or part of the Updated Joint Housing Strategy currently proposed for change. Insofar as the promotion of environmental building standards is concerned however, please refer to the Joint Housing Strategy Policy Objective No 14 which states that 'The Councils will promote the design and delivery of environmentally sustainable and energy efficient housing, including through the refurbishment and upgrading of existing stock. The Councils will support housing design that contributes to climate resilience and climate mitigation, including innovative low carbon construction methods and the reduction of embodied energy in newly built homes.' Without further guidance on this issue from all relevant stakeholders it is not possible to quantify this commitment.
<b>Chief Executive's Recommendation</b>	No Further Action Required.
<b>Interested Party</b>	<b>Irish Traveller Movement</b>
<b>Ref. No.</b>	PADP401358594
<b>Proposed Amendment No.</b>	PROPOSED AMENDMENT NO. 1.4.9
<b>Submission Summary</b>	This submission highlights the crisis in accommodation nationally for Travellers, referencing statistics from the report by the Ombudsman for children's Office and the European Social Rights Institute report. In commenting about the Cork County

	<p>Traveller Accommodation the submission requests that it adequately identifies the accommodation needs of all Travellers in Cork County, including in particular East Cork where it is states that Traveller specific accommodation in that area has not been recognised. The submission states that it is essential that the County Development Plan aligns with the Traveller Accommodation Programme and that clear targets are indicated within it which meet the identified need in full. It is also proposed that the Development Plan should also recognise the difficulties faced by Travellers in accessing the private rental market. The submission sets out the checklist and series of recommendations from the Office of the Planning Regulator’s Case Study Paper ‘Traveller Accommodation and the Local Development Plan’, the Development Plan Guidelines (2007) and a further series of recommendations to enhance the current Development Plan to ensure the accommodation needs, including culturally appropriate Traveller-specific accommodation of Travellers in Cork County Council area are met during the lifespan of the Plan. The submission requests that projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10), that sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the plan, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i). The submission states that there has been no identification for the need for one off rural housing in the Cork County Council Traveller Accommodation Programme 2019-2024 and that this is a much sought after housing option for Traveller families. The submission requests that a better system of monitoring, consultation and reviewing the provisions as they relate to Traveller accommodation should be included in the Development Plan and that the inclusion of an ethnic identifier would improve the quality of data collection and monitoring of provision of accommodation for Travellers. The submission also recommends that the Development Plan should counteract undue segregation, help to alleviate homelessness and to consider how future Development Plans could have their timelines aligned with the TAP allowing for a more integrated approach. In addition, the submission requests that the Development Plan should reference the Council’s strategy to implement the relevant recommendations of the recent Irish Human Rights &amp; Equality Commission Equality Review on the provision of Traveller accommodation in the Cork County area. Finally, the submission makes a number of recommendations to provide clean affordable energy, and energy efficient homes in Traveller specific accommodation.</p>
<p><b>Chief Executive's Response</b></p>	<p>In relation to the points raised in the submission regarding the social housing application form, it is due to be updated in March 2022 with the introduction of a Traveller identifier.</p> <p>The submission states that travellers living in East Cork were not included in the TAP and unmet needs in that area were not recognised. This is not correct, the East Cork figures are contained within the Southern Division figures.</p> <p>Regarding the proposed amendment itself and the scope of non-material changes that can be made at this stage, it is proposed to include a minor modification to acknowledge and state that the Traveller Accommodation Programme anticipates that the future accommodation needs of those Traveller Households whose current accommodation is in private rented accommodation can be met in private rented accommodation, and also to note that the issue of Traveller accommodation is based on the current Travellers Accommodation Programme 2019-2024 and also given the period of the County Development Plan to Q3 2028 to make reference to any subsequent programme adopted by the Council.</p> <p>See also Response to Office of the Planning Regulator Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report</p>



<b>Chief Executive's Recommendation</b>	See Recommendation to Office of the Planning Regulator Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report
<b>Interested Party</b>	<b>John Daly</b>
<b>Ref. No.</b>	PADP400926091
<b>Proposed Amendment No.</b>	Updated Draft Joint Housing Strategy: No Amendments
<b>Submission Summary</b>	This submission states that in meeting future housing requirements there is too much focus on houses / households and that there is a need to have a breakdown on apartments per area. The submission requests that apartments only areas should be stated in the docklands (with minimum floor heights of 6 to 10 storeys) and also potentially within the N40 city boundary for new builds. The submission requests a commitment to build up is required across the city as it notes there is too much sprawl and to build a nice skyline to give people a home for the future.
<b>Chief Executive's Response</b>	This submission does not relate specifically to any specific Proposed Amendment or part of the Updated Joint Housing Strategy currently proposed for change. Insofar as the promotion of apartment construction and building height is concerned however, please refer to the Joint Housing Strategy Policy Objective No 1 which states that 'It is the objective of Cork County Council and Cork City Council to aim for housing to be available to meet the needs of people of all needs and incomes in Cork, with an appropriate mix of housing sizes, types, and tenures in suitable locations. This will include the provision of new social and affordable housing of a high quality and appropriate to the specific needs of households. In support of this objective, and to ensure a suitable housing mix is provided within individual developments and within communities, planning applications for multiple housing units will be required to submit a Statement of Housing Mix detailing the proposed housing mix and why it is considered appropriate in meeting the needs of an area.'
<b>Chief Executive's Recommendation</b>	No Further Action Required.

## 5 Chapter 5 Rural

<b>Table 1.5</b>	<b>Chapter Five Rural</b>
<b>Interested Party</b>	<b>Denis Weathers</b>
<b>Ref. No.</b>	PADP400811251
<b>Proposed Amendment No.</b>	NA
<b>Submission Summary</b>	<p>This submission does not relate to a specific Proposed Amendment, rather it provides various comments in relation to the Draft Plan rural housing policy. The submission expresses dissatisfaction that despite making a submission at Draft Plan stage, no changes have been made. The Draft Plan policy is considered unfair, detailing concerns that the policy prevents children building on farm land owned by their parent/s.</p> <p>A specific example is provided of a case where children may seek planning permission on land located outside a village boundary but in the ownership of their family for generations. Such applicants are being refused if the family currently reside in the village.</p> <p>A number of reasons why this policy is opposed are set out including; financial strain on children having to buy a site elsewhere, potentially having to move away from the rural area, preventing parents gifting a site to their children, does not treat the children of landowners who own land in the country side in a fair and equal way compared to families living in the countryside.</p>
<b>Chief Executive's Response</b>	This submission does not relate to any Proposed Amendment. Material changes to the rural housing policy cannot be considered at this stage of the review process.
<b>Chief Executive's Recommendation</b>	No Further Action Required.
<b>Interested Party</b>	<b>Mary O'Leary</b>
<b>Ref. No.</b>	PADP401452874
<b>Proposed Amendment No.</b>	This submission references unspecified amendments in Volume One Chapters 3, 5, 7, 8, 9 and 10
<b>Submission Summary</b>	<p>The submission supports a number of proposed amendments in Volume 1 particularly in relation to the following;</p> <ul style="list-style-type: none"> <li>• Amendments that support areas of natural heritage, environment and areas of biodiversity.</li> <li>• Amendments that support the creation of resilient vibrant communities, revitalize derelict town centres where people can again find homes at affordable prices.</li> <li>• Amendments that support compact and sustainable forms of development and growth and a circular economy that will reduce our impact on resources.</li> <li>• Amendments that ensure environmental and ecological considerations are given equal weight in planning, to minimize detrimental impacts of socio-economic development.</li> </ul> <p>States that the commitment to all the above objectives will be a challenge in the role out of the CDP but trusts that the Council will give a full commitment to this.</p>

<b>Chief Executive's Response</b>	<p>This submission supports the change set out in Proposed Amendments with respect to a number of chapters in Volume One including Chapter 3 Settlement and Placemaking, Chapter 5 Rural, Chapter 7 Marine, Coastal and Islands, Chapter 8 Economic Development and Chapter 10 Tourism. The comments made in this submission are welcomed, the Council are fully committed to securing the implementation of the policy objectives of the County Development Plan, including the provision of a 2-year progress report of the County Development Plan as required under the Planning &amp; Development Acts.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendments with No Modification.</p>

## 6 Chapter 6 Social and Community

<b>Table 1.6</b>	<b>Chapter Six Social and Community</b>
<b>Interested Party</b>	<b>Department of Education</b>
<b>Ref. No.</b>	PADP401411206
<b>Proposed Amendment No.</b>	1.64, 1.6.7, 4.1.3.30, 4.3.3.4, 4.3.3.17, 4.3.3.39, and 5.1.4.6
<b>Submission Summary</b>	<p>The Department of Education submission discusses Chapter 2, Core Strategy and acknowledges proposed Table 2.11 which outlines the residential reserves and states although there will not be specific growth figures for these areas in question it is accepted that significant levels of development on lands identified in proposed Table 2.10 would generate a population growth that would require educational provision as identified in their previous submission to the Draft Plan.</p> <p>Regarding Carrigtwohill it states although the population target has reduced in the short term the provision for a future primary school as outlined in their previous submission remains due to the amount of development land that remains in the settlement.</p> <p>Regarding Midleton it states the requirement for two primary schools and one post-primary school, which were identified in proposed amendment in the Water-Rock Urban Expansion Area, will remain as the UEA will be developed over the lifetime of more than one Development Plan, even though the proposed population targets are reduced in the short term.</p> <p>Regarding Cobh it states the requirement for an additional post-primary school remains despite reduced population targets, as the UEA in Cobh will be developed over the lifetime of more than one development plan.</p> <p>The submission notes that there will be a potential requirement for further school places and the need to expand existing school facilities remains, as outlined in their previous submission.</p> <p>In relation to Chapter 6 it notes Proposed Amendments 1.6.4 and 1.6.7 are welcomed. The submission notes in Volume 4, Proposed Amendments 4.1.3.30 in Carrigaline and 4.3.3.4, 4.3.3.17 and 4.3.3.39 in Midleton and states the Department will work with the Council to identify these sites.</p> <p>In Volume 5, Proposed Amendment 5.1.4.6 and new objective KS-C-04 in Kinsale is noted.</p>
<b>Chief Executive's Response</b>	<p>This submission supports the changes set out in Proposed Amendments in Chapter 6 Social and Community, such as 1.64, 1.6.7, and Proposed Amendments in Volume Four and Five: 4.1.3.30, 4.3.3.4, 4.3.3.17, 4.3.3.39, and 5.1.4.6.</p> <p>The contents of this submission are noted and welcomed. The Council will continue to work with Department of Education with regard to identifying provision for educational facilities in the county.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendments in Chapter 6 and Proposed Amendments 4.1.3.30 in Carrigaline and 4.3.3.4, 4.3.3.17 and 4.3.3.39 in Midleton, and 5.1.4.6 in Kinsale with No Modification.
<b>Interested Party</b>	<b>Jack Long</b>
<b>Ref. No.</b>	PADP395823500

<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	Submission highlights the need to expand healthcare services in line with population expansion noting that this need is not addressed in the Plan. It also proposes that the Council should work with the HSE and Dept. of Health to produce a Development Plan that includes population health.
<b>Chief Executive's Response</b>	<p>This submission does not relate to any Proposed Amendment and therefore while the issues raised are noted, they cannot be considered further at this stage.</p> <p>In the Draft Plan Objective SC 6-1 in Chapter 6 Social and Community supports the provision of Social and Community Infrastructure, and Objective SC 6-8 in Chapter 6 provides support to the HSE, and other statutory and voluntary agencies in the provision of healthcare facilities in all sections of the community throughout the county. The National Planning Framework and the National Development Plan 2018-2027 both highlight the changes in population and health needs and consequential changes in health infrastructure going forward, and it is outlined in Chapter 6 where investment in health infrastructure is intended and based on delivery of health and social care facilities that meets the needs of our population.</p>
<b>Chief Executive's Recommendation</b>	No Further Action Required.

## 7 Chapter 7 Marine Coastal and Islands

<b>Interested Party</b>	<b>Dept. of Agriculture, Food &amp; the Marine</b>
<b>Ref. No.</b>	PADP401326639
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	This submission states that the Department Agriculture, Food and the Marine have no observations or comments on proposed amendments to the Draft Cork County Development Plan 2021 and preparation of a new County Development Plan at this time.
<b>Chief Executive's Response</b>	Submission is noted.
<b>Chief Executive's Recommendation</b>	No further action required.
<b>Interested Party</b>	<b>McCutcheon Halley</b>
<b>Ref. No.</b>	PADP401431288
<b>Proposed Amendment No.</b>	1.8.14
<b>Submission Summary</b>	<p>This submission relates specifically to Proposed Amendments 1.8.14 in Chapter 8 Economic Development. This submission proposes a modification to this Amendment as follows;</p> <p>Modification to Proposed Amendment 1.8.14</p> <p>The submission states that proposed amendment 1.8.14 is welcomed however it considers that a greater emphasis is required on new technologies with regard to fish farming and aquaculture, particularly where some have been proven to be more sustainable. Recirculation Aquaculture Systems (RAS) have the potential to overcome many traditional constraints while also increasing efficiencies. RAS has been identified as having a valuable role to play in the freshwater part of the life cycle of the salmon, as it would permit the Irish industry to avail of significant overall efficiencies by using RAS to increase smolt size/weight at transfer to sea. Potential for RAS exists on shore in specially designed tanks, and research also shows that this type of system can be successfully located in quarries which have access to the sea. Given the well documented issues associated with traditional aquaculture methods relating to salmon farming, we consider that emerging policy should encourage innovation in the sector including more sustainable methods such as RAS.</p> <p>The following additional wording is therefore suggested;</p> <p>"Development in Fisheries and Aquaculture production will need to have regard to ecological and environmental considerations to minimise any detrimental impacts on resources and ecosystems. The Council supports the use of new sustainable aquaculture technologies such as on-shore Recirculation Aquaculture Systems which minimise potential effects on the environment and ecology and are the preferred technology for future fish-farm proposals. "The Council supports the Marine Strategy Framework</p>

	Directive (MSFD) European Legislation, which aims to protect the marine environment which requires the application of an ecosystem-based approach to the management of human activities, enabling a sustainable use of marine goods and services.”
<b>Chief Executive's Response</b>	<p>This submission requests a change to proposed amendment 1.8.14.</p> <p>The Council is supportive of the deployment of new technology where appropriate and beneficial and where it supports the delivery of the objectives of the Development Plan. In a development context, the suitability of the deployment of any specific technology is best considered at the project level when all the facts about a specific development are known and can be assessed. It is not appropriate for the Plan to predetermine the broad suitability of a specific technology for deployment generally. Furthermore, it is not necessary or feasible for the plan to name check individual technologies for specific sectors of the economy. The change proposed is very specific in nature and would be a material change to the plan. It would not be appropriate at this stage of the review process to make the change requested to proposed amendment.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.8.14 with No Modification.

## 8 Chapter 8 Economic Development

<b>Interested Party</b>	<b>McCutcheon Halley Planning Consultants</b>
<b>Ref. No.</b>	PADP401346482
<b>Proposed Amendment No.</b>	1.8.14 and 1.13.11
<b>Submission Summary</b>	<p>This submission relates specifically to Proposed Amendments 1.8.14 and 1.13.11. Proposed Amendment 1.8.14 relates to Chapter 8 Economic Development and Proposed Amendment 1.13.11 relates to Chapter 13 Energy and Telecommunications. This submission proposes modifications to these two Amendments as follows;</p> <p>Modification to Proposed Amendment 1.8.14 relating to Fisheries and Aquaculture.</p> <p>The submission states that proposed amendment 1.8.14 is welcomed however it considers that a greater emphasis is required on new technologies with regard to fish farming and aquaculture, particularly where same have been proven to be more sustainable. The submission considers that emerging policy should encourage innovation in the sector including more sustainable methods such as <b>Recirculation Aquaculture Systems (RAS)</b> . The following additional wording is therefore suggested (<b>in bold</b>);</p> <p>“Development in Fisheries and Aquaculture production will need to have regard to ecological and environmental considerations to minimise any detrimental impacts on resources and ecosystems. <b>The Council supports the use of new sustainable aquaculture technologies such as on-shore Recirculation Aquaculture Systems which minimise potential effects on the environment and ecology and are the preferred technology for future fish-farm proposals.</b> The Council supports the Marine Strategy Framework Directive (MSFD) European Legislation, which aims to protect the marine environment which requires the application of an ecosystem-based approach to the management of human activities, enabling a sustainable use of marine goods and services.”</p> <p>Modification to Proposed Amendment 1.13.11 relating to Objective ET 13.16.</p> <p>The submission states that proposed amendment 1.13.11 correctly identifies the requirement for land-based infrastructure to support the appropriate development of ocean and offshore wind energy facilities. However, the submission considers that the text should be modified to acknowledge the need for <u>wet storage</u> of the turbines within the foreshore while they are awaiting transport to the off-shore site. Sufficient dry and wet storage is a key consideration in the development of offshore wind support facilities, with few seaports currently suitable to facilitate each of the required on-site stages. Furthermore, the submission suggests an additional modification to the text outlining the preferred option for such applications. In general, preference should be given to locations where existing port facilities can be altered and /or extended to provide the full range of services required for offshore deployment. The following additional wording is therefore suggested in bold;</p> <p>“Support the appropriate development of ocean and offshore wind energy</p>



	<p>production off the Cork Coast by ensuring adequate provision of land-based infrastructure in line with national policy, and in a way that avoids significant adverse impacts on sites of ecological value and protects the wider environmental, heritage, landscape and marine resources of the area. The need for land-based infrastructure to support the assembly, <b>wet-storage</b>, deployment, and maintenance of the offshore energy structures is recognised, and <b>favourable consideration will be given to areas where existing port facilities can be extended to provide the required range of services.</b> <del>as is the</del> The need for an integrated approach to the use and management of the coastal zone and coastal resources <b>is also recognised.</b>”</p>
<b>Chief Executive's Response</b>	<p>This submission requests changes to Proposed Amendments 1.8.14 and 1.13.11.</p> <p>With regard to Proposed Amendments 1.8.14, the Council is supportive of the deployment of new technology where appropriate and beneficial and where it supports the delivery of the objectives of the Development Plan. In a development context, the suitability of the deployment of any specific technology is best considered at the project level when all the facts about a specific development are known and can be assessed. It is not appropriate to predetermine the broad suitability of a specific technology for deployment generally. It is not necessary or feasible for the plan to name check individual technologies for specific sectors of the economy. The change proposed is very specific in nature and would be a material change to the plan. It would not be appropriate at this stage of the review process to make the change requested to proposed amendment 1.8.14.</p> <p>With regard to proposed amendment 1.13.11, the plan already supports the ocean and offshore energy production sectors, and this encompasses the ancillary and supporting infrastructure needed to enable that. It is not necessary for every infrastructural item to be specified in the Plan. The appropriateness of the nature and scale of a development is best considered at the project level when all the facts about a specific development are known and can be assessed against all the objectives of the plan. The change proposed is very specific in nature and would be a material change to the plan. It would not be appropriate at this stage of the review process to make the change requested to proposed amendment 1.13.11.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendment 1.8 .14 with No Modification. Adopt Proposed Amendment 1.13.11 with No Modification.</p>

## 9 Chapter 9 Town Centres and Retail

<b>Table 1.9</b>	<b>Chapter 9 Town Centres and Retail</b>
<b>Interested Party</b>	<b>Tesco Ireland Limited</b>
<b>Ref. No.</b>	PADP400971549
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	<p>The submission encourages the local authority to continue to engage with stakeholders in the retail sector to ensure that there are appropriate policies in the Draft Cork CDP to attract new investment in the County, protect the viability and vitality of existing retail premises and accommodate refurbishment and expansion of the older premises. It expresses disappointment over the lack of appropriate sites identified to facilitate convenience retailing and would encourage the CDP to consider further sites for convenience retailing.</p> <p>When suitable sites are not available in the town centre, edge of centre sites should be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorplate. Due to the nature of convenience retailing, policy should not be as restrictive as comparison retail, with a need for greater zoning flexibility to accommodate modern stores.</p> <p>The submission highlights in particular examples in Kinsale, Skibbereen, Carrigaline, Passage West and Bantry where there are a lack of suitable sites for convenience retail noting that it is important that additional sites are identified in order to ensure the population is served.</p> <p>The submission requests that flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan are provided.</p>
<b>Chief Executive's Response</b>	This submission does not relate to any Proposed Amendment and therefore while the issues raised are noted, they cannot be considered further at this stage.
<b>Chief Executive's Recommendation</b>	No Further Action Required.

## 10 Chapter 10 Tourism

<b>Interested Party</b>	<b>Andrew Ashford &amp; Marian O'Leary</b>
<b>Ref. No.</b>	PADP401329174
<b>Proposed Amendment No.</b>	1.10.6
<b>Submission Summary</b>	<p>This submission relates to Chapter 5 (Rural) and Chapter 10 (Tourism) and amendment number 1.10.6 (Eco Tourism). The submission raises the following:</p> <ul style="list-style-type: none"> <li>• Text set out within Chapter 10 (Tourism) relates only smaller scale developments being considered outside of settlement boundaries on farm holdings with no reference to other tourist related businesses or existing accommodation providers who may also have land suitable for camping/glamping development;</li> <li>• Similarly, Chapter 5 (Rural) relates only to development of farm and farm structures for owner run use as short term holiday accommodation or appropriately scaled camping being located within the main farm holdings;</li> <li>• Requests additional text to include other tourist related businesses or existing accommodation providers who may also have land suitable for camping/glamping development.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission requests a change to Proposed Amendment 1.10.6 to provide for other tourist related businesses or existing accommodation providers who may also have land suitable for camping/glamping development. A change here would be a material change that we cannot do at this stage of the review.</p> <p>Objective 10.10: Tourism Facilities in the draft plan provides scope for many different options inside and outside the development boundary to be considered on their own merits. See also amendment 1.10.17 in relation to objective TO:10.10.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.10.6 with no modification.
<b>Interested Party</b>	<b>Robbie Harrington</b>
<b>Ref. No.</b>	PADP400218773
<b>Proposed Amendment No.</b>	1.10.4 and 1.12.48
<b>Submission Summary</b>	<p>This submission requests that the Lee to Sea Greenway should be given priority for delivery as a key, strategic piece of transport infrastructure.</p> <p>It requests that a specific Lee to Sea Greenway objective is added to the Plan in line with the two Lee to Sea objectives in the Regional Spatial and Economic Strategy and the 2 Lee to Sea objectives in the Cork Metropolitan Area Transport Strategy (CMATS). A strategic Lee to Sea Greenway objective will help support future national funding from NTA on the feasibility route selection and phased delivery during the Plan period.</p>

	Submission requests a specific Lee to Sea Greenway Objective for the greenway to be delivered in the short to medium term within Plan 2022-2028.
<b>Chief Executive's Response</b>	<p>The Draft Plan notes in paragraph 12.7.14 that, <i>“This Plan supports the implementation of the Cork Cycle Network Plan for the metropolitan area originally published in 2017 and now included in CMATS. A key element of this in the County area is the Cork Harbour portion of the Lee to Sea Greenway which has subsequently been identified as a transport priority for Metropolitan Cork in the RSES. The Lee to Sea Greenway route comprises an east-west greenway through Cork city centre, connecting major employment/education hubs to Ballincollig, in the city, and Carrigaline in the county, and it is specifically supported in Southern RSES Cork MASP objectives 8i and 17c. CMATS identifies the ‘flagship Lee to Sea Greenway from Ballincollig to Crosshaven’ as a short to medium term deliverable.”</i></p> <p>There are two proposed amendments in relation to the Lee to Sea. Firstly, in amendment 1.10.4, the reference of the Lee to Sea as a ‘long term project’ has been removed. Secondly, Submission requests a specific Lee to Sea Greenway Objective for the greenway to be delivered in the short to medium term within Plan 2022-2028. Note that Proposed Amendment 1.12.48 is as follows TM 12.2.6: <i>Deliver the Cork Harbour Greenway, a component of the Lee to Sea Greenway, subject to environmental assessment. See also TM 12.2.5.</i> It is not proposed to further modify this Proposed Amendment.</p> <p>There are no more amendments considered necessary.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendment 1.10.4 with no modification.</p> <p>Adopt Proposed Amendment 1.12.48 with no modification.</p>

## 11 Chapter 11 Water Management

<b>Interested Party</b>	<b>Irish Water</b>
<b>Ref. No.</b>	PADP400523964
<b>Proposed Amendment No.</b>	Proposed Amendment No's 4.3.3.20, 4.3.3.18, 1.15.20, 1.11.12 and 1.13.35
<b>Submission Summary</b>	<p>Irish Water welcomes the proposal to Promote SuDS and in particular promotion of Nature based SuDS and would welcome a policy direction to prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.</p> <p>Midleton MD-X-01 site - Irish Water intend to locate strategic wastewater network infrastructure (i.e. below ground pump station and associated infrastructure including pipeline, kiosk, access and boundary fencing) within that site location. A compulsory purchase order (CPO) process is currently underway and Irish Water would respectfully request that the planning authority bear in mind the impact, if any, that the proposed rezoning would have on delivering this strategic and long planned water services at this location.</p> <p>Proposed Amendment no. 1.16.20 – considers that it is more appropriate that archaeological investigations take place pre-commencement, in the event of a grant of permission, rather than in advance of a planning decision.</p> <p>Proposed Amendment no.1.11.12 – delete reference to “in the context of the National Development Plan and the National Planning Framework”.</p> <p>Proposed Amendment no.1.13.35 – include text in part d) that proposals should make provision for appropriate onsite storage to protect the public water supply from surge take off, promotion of water conservation measures through the recycling and re-using of water and the provision of appropriate SuDS.</p> <p>Irish Water’s analysis of their ability to meet the population targets has been revised to reflect the new growth targets and Draft Wastewater and water capacity assessments are attached to the submission.</p>
<b>Chief Executive's Response</b>	<p>This submission supports the Council’s approach to the promotion of SuDS and Nature Based SuDS and requests a policy direction to prohibit the discharge of additional surface water to combined sewers. There is extensive policy in relation to SuDS and surface water management contained in the Draft Plan that consider these issues. The comments don’t relate to any Proposed Amendment, and therefore while the issues raised are noted, they cannot be considered further at this stage.</p> <p>The submission requests the Council considers the impact the proposal to revise the zoning of the MD-X-01 site to green infrastructure may have on a planned strategic wastewater infrastructure project. The Council are aware of Irish Water’s live proposal to locate strategic wastewater infrastructure on part of the site zoned as MD-X-01 in the Draft Plan. This proposal will be assessed on its merits in accordance with the Development Plan in force at the time of the making of a decision. For further discussion see detailed response provided in relation to submissions PADP401397343 and PADP401448017 in Volume Two Part 2 of this Report.</p>

	<p>The submission requests a change to Proposed Amendment no. 1.16.20 to require archaeological investigations take place pre-commencement, in the event of a grant of permission, rather than in advance of a planning decision. Carrying out investigations in advance of a planning decision de-risks the site from an archaeological perspective. It is considered appropriate to know in advance of any significant archaeology identified within a development site in order to <i>preserve in situ the archaeological site</i>, as outlined in the Departments 'Frameworks and Principles for the Protection of the Archaeological Heritage'.</p> <p>This submission requests a change to Proposed Amendment no.1.11.12 to exclude reference to the National Development Plan and National Planning Framework. The wording of the amendment is considered to adequately reflect the context of discussions ongoing in relation to this issue.</p> <p>Additional text is requested to Proposed Amendment no.1.13.35 to include text referring to onsite storage to protect the public water supply from surge and this additional text is considered appropriate and can be included as a minor modification.</p> <p>The updated analysis of the capacity of water and wastewater infrastructure to cater for the revised growth targets is noted. Where appropriate, the updated position will be reflected as non-material changes to the Draft Plan.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendment 4.3.3.20, 4.3.3.18, 1.11.12 and 1.16.20 with No Modification.</p> <p>Adopt Proposed Amendment 1.13.35 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.</p> <p>Make a non-material change to water services infrastructure capacity information.</p>
<b>Interested Party</b>	<b>Michael Murphy</b>
<b>Ref. No.</b>	PADP401446537
<b>Proposed Amendment No.</b>	Proposed Amendment Nos 1.11.4 and 4.4.6.1.
<b>Submission Summary</b>	<p>This submission refers to Vol 1&amp; 2 and Proposed Amendments to South Cork of the Cork CDP 2022-2028</p> <ol style="list-style-type: none"> <li>1. The minimum distance of any development from a river should be increased from 30m to a minimum of 130m.</li> <li>2. No remaining Assimilative Capacity exists for the River Bride in Ovens. Any treated effluent from any future residential and non-residential development in the Killumney Ovens area should discharge to the River Lee directly. The cumulative impact of all developments should be included when calculating the assimilative capacity of a river that is proposed as the receiving body of water for treated effluent.</li> <li>3. Grange Manor WWTP is not suitable for upgrade. It is in a flood zone and flooded 3 times in the past 11 years. A new WWTP on a suitable greenfield site away from a flood zone and discharging directly to the River Lee should be developed.</li> <li>4. The flood zones should be increased along the River Bride to reflect the recent multiple flooding events.</li> <li>5. The EU Habitats Directive, EU Floods Directive, EU Water Framework Directive, the 2009 Surface Water Regulations, the PDR 2009 and the Environmental Liability Directive should be followed fully when updating and implementing the Cork County Development Plan 2022-2028.</li> </ol>

<b>Chief Executive's Response</b>	<p>The submission requests the minimum distance of any development from a river be increased from 30m to 130m. Proposed Amendment 1.11.4 recognises the factors that may dictate the appropriate width of the riparian zone and this amendment in conjunction with Objective WM 11-11 in the Draft Plan are considered to provide adequate protection to the riparian zone.</p> <p>The submission requests the flood zones along the River Bride be increased. It is assumed that this request relates to Proposed Amendment No. 4.4.6.1 which provides for the inclusion of a updated flood zones map for Killumney/ Ovens. The flood zones have been derived in accordance with the requirements of the Flooding Guidelines and using best available information. For further discussion on this issue see Key Issue raised in relation to Water Management in Volume One Part 1 of this Report.</p> <p>This submission raises a number of further issues which are outside the scope of any Proposed Amendment and therefore while the issues raised are noted, they cannot be considered further at this stage.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.11.4 and 4.4.6.1 with No Modification.
<b>Interested Party</b>	<b>Office of Public Works</b>
<b>Ref. No.</b>	PADP401268237
<b>Proposed Amendment No.</b>	Proposed Amendments No. 1.11.1, 3.1.5.6, 3.2.3.15, 3.2.3.23, 4.4.7.3, 5.1.4.23 and other unspecified amendments.
<b>Submission Summary</b>	<p>The Office of Public Works (OPW) are the lead agency for flood risk management in Ireland.</p> <p>The updated Flood Zone Mapping is welcomed. Whilst Tables 2 and 51 of the SFRA set out the different mapping datasets used; it would be useful if the dataset used for each settlement could be noted within the SFRA document.</p> <p>The Justification Tests that have been provided in the updated SFRA are welcomed, noting that it would be helpful in cases where zonings are justified subject to specific mitigation measures, that these measures be incorporated into the text for the specific zoning objectives.</p> <p>They note that the majority of sites/zonings requiring a Justification Test have been identified by the Council. However, they note that there are areas of Existing Residential/Mixed Residential &amp; Other Uses zonings and Existing Mixed/General Business/Industrial Use zonings, for all settlements, that are located in Flood Zones A and B, for which Justification Tests have not been provided. They refer to Table 48 of the SFRA which states that Existing Mixed/General Business/Industrial Use zonings is not appropriate in Flood Zones A, and of Existing Residential/Mixed Residential &amp; Other Uses zonings is not appropriate in Flood Zones A or B, unless a Plan-making Justification Test can be satisfied.</p> <p>Reference is made to circular PL 2/2014 which provides further guidance and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B and requiring the planning authority to specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas.</p> <p>For sites where only a small portion of the site is at risk of flooding, that are intended to be zoned for development following the application of a Justification Test, a policy objective might be attached to such a zoning. They note that such an objective might require that the sequential approach be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within the site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied, following a detailed FRA. This would ensure that flood risk on these sites can be managed through the sequential approach only, without</p>

	<p>the requirement for further mitigation measures.</p> <p>They note there are a number of zonings in Flood Zones A and B, where the SFRA states that the sequential approach is to be applied, but for which the Justification Test has not been applied. They note that the application of the sequential approach as mitigation should be used for zoning that has passed the Justification Test, this mitigation should also be incorporated into the zoning objective text. The updated flooding objectives are welcomed.</p> <p>They note that the Guidelines recommend that the SFRA provide guidance on SuDS for managing surface water run-off and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.</p> <p>The OPW have provided site specific and settlement wide advice for the following settlements:</p> <ul style="list-style-type: none"> <li>• Mitchelstown – query regarding Amendment no. 3.1.5.6</li> <li>• Mallow – zoning objectives and existing built-up area not referenced in SFRA. An undeveloped area north of MW-GC-13 has failed the Justification test but has been re-zoned to less vulnerable Existing Mixed/ General Business/ Industrial use, but this is not appropriate in Flood Zone A.</li> <li>• Charleville - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Newmarket - existing built-up area not referenced in SFRA</li> <li>• Liscarroll - zoning objective not referenced in SFRA</li> <li>• Carrigaline - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Passage West - existing built-up area not referenced in SFRA</li> <li>• Crosshaven and Bays - existing built-up area not referenced in SFRA</li> <li>• Ringaskiddy - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Carrigtwohill - zoning objectives and existing built-up area not referenced in SFRA</li> <li>• Cobh - existing built-up area not referenced in SFRA</li> <li>Little Island - existing built-up area not referenced in SFRA</li> <li>• Glounthaune - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Middleton - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Youghal - existing built-up area not referenced in SFRA</li> <li>• Cloyne - existing built-up area not referenced in SFRA</li> <li>• Whitegate/Aghada - existing built-up area not referenced in SFRA</li> <li>• Macroom - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Millstreet - existing built-up area not referenced in SFRA</li> <li>• Béal Átha An Ghaorthaidh - query regarding Amendment no. 4.4.7.3 which relates to the most recent flood event in the area.</li> <li>• Bandon - existing built-up area not referenced in SFRA. Amendment 5.1.4.23 adds a Residential Reserve site but a small overlap with Flood Zone A exists and a highly vulnerable development in Flood Zone A is not appropriate unless a Plan Making Justification Test can be satisfied.</li> <li>• Kinsale - existing built-up area not referenced in SFRA</li> <li>• Clonakilty - existing built-up area not referenced in SFRA</li> <li>• Bantry - zoning objective and existing built-up area not referenced in SFRA.</li> </ul> <p>Further query regarding Justification Tests for BT-X-02 and BT-T-03 zonings.</p> <ul style="list-style-type: none"> <li>• Skibbereen - existing built-up area not referenced in SFRA</li> <li>• Dunmanway - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Castletownbere - zoning objective and existing built-up area not referenced in SFRA</li> <li>• Schull - existing built-up area not referenced in SFRA</li> <li>• Goleen - zoning objective not referenced in SFRA</li> </ul>
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<p><b>Chief Executive's Response</b></p>	<p><b>Flood Zone mapping</b></p> <p>The Local Authority welcomes OPW’s acceptance of the updated flood zone mapping. In order to provide clarity around the datasets used to generate the flood zone mapping in each settlement it is intended that the SFRA document be further updated to include a table with this information.</p> <p><b>Justification Tests</b></p> <p>The OPW requests that mitigation measures set out in Justification Tests be included in the specific zoning objectives. In the development of the SFRA, a deliberate decision was taken not to include the mitigation measures in the text of the specific zoning objective as it was felt that this approach may result in applicants/ developers focusing solely on addressing those issues set out in the objective without the benefit of the full context of the Justification Test and the wider comments on the settlement at large. The update flooding policy and objectives directs all potential applicants to the recommendations and commentary of the updated Strategic Flood Risk Assessment requiring that application of the flood policies of the Plan are fully informed by the SFRA and Justification Tests. Furthermore, reference back to the SFRA was deemed essential as it was clear that the conclusion of some of the Justification Tests involved matters that were applicable to the wider settlement and the SFRA was the appropriate place to provide the context for these conclusions. Amendments were also promoted across a variety of settlements to highlight the need to consult the updated SFRA to strongly establish the link between the Plan and the SFRA. This is therefore considered a more holistic approach and strengthens the link between the Plan and the Strategic Flood Risk Assessment.</p> <p>The absence of Justification Tests in some parts of the Existing Residential/Mixed Residential &amp; Other Uses zoning objective located within Flood Zone A and B has been queried. This zoning covers large areas of the towns and larger villages of the County. These are largely built out areas of predominantly residential use and in considering how best to apply the guidelines, the application of the Plan making Justification Tests within the built up areas were focussed on those parcels of land with development or re-development/ regeneration potential. The approach to lands outside of these sites, that is, parts of the built up areas within Flood Zone A and B where no Justification Test was carried out, was to restrict development to Minor Development only as set out in Section 5.28 of the Guidelines.</p> <p>Paragraph 3.4.5 of the SFRA outlines as follows;</p> <p style="text-align: center;"><i>“In the case of existing built up areas, such as for residential, commercial or business, within Flood Zones A and B, unless the Justification Test has been applied and passed, it is the case that no new development is permitted and the only works allowed will be in accordance with Section 5.28 of the Planning Guidelines, and the ‘Minor Development’ Section of this SFRA”.</i></p> <p>While these areas are not distinguished with a specific mapping layer, the Flood Zones have been overlaid on the land use zonings maps to ensure these areas are clearly identifiable. This has the effect of operating a constrained land use approach on these lands, limiting development to minor development only. This is clearly spelled out in the flood risk objectives set out in the Proposed Amendment 1.11.1.</p>
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*“Take the following approach in order to reduce the risk of new development being affected by possible future flooding:*

- *Avoid development in areas at risk of flooding; and*
- *Apply the sequential approach to flood risk management based on avoidance, substitution, justification and mitigation of risk.*
- *Where development in floodplains cannot be avoided, applications for development must meet the definition of Minor Development or have passed the Justification Test for Development Plans in the updated SFRA and can pass the Justification Test for Development Management to the satisfaction of the planning authority.*
- *Consider the impacts of climate change on the development”*

It should be noted that Table 48 is referring to the application of the Development Management Justification Test.

In relation to the application of Circular PL 2/2014, this has been done as a result of the conclusion of the Justification Tests and as set out above, appropriate text has been included in the text of relevant settlements.

The OPW have also queried the approach taken to sites where only a small portion of the site is at risk of flooding and the Justification Test has been passed. The proposed amendment to Chapter 11 setting out the updated flooding policy and objectives require the application of the sequential approach to all sites with flood risk. This is a fundamental principle of the flooding policy and specification in certain objectives could perhaps give an erroneous impression that this is only applicable in those instances.

The overwhelming majority of sites where flood risk was identified through the updated mapping have been amended to exclude the area at risk and zone that land for a water compatible use. In a very small number of locations, where only a minor portion of a site has been identified as having a flood risk, and no Justification Test has been carried out, and where zoning this portion of the site for green infrastructure was not practical or feasible, the SFRA has also recommended a sequential approach to development on the site and this has been clearly set out in the flooding policy and objectives.

Comments in relation to SuDS and Natural Water Retention Measures are noted however, this would require significant detailed work at settlement level which was not possible in the timeframe of the review of the Plan.

**Settlement specific issues**

The following table sets out the response to the settlement and site specific queries raised. These will largely be dealt with through an update of the SFRA.

Issues raised	CE Response
<p>Mitchelstown - MH-U-03 Amendment 3.1.5.6 rezones the area zoned as Existing Mixed General Business Industrial uses to MH-U-3 to reflect its use as a Wastewater Treatment Plant. It is unclear why only the section of the plant on the northern side of the Watercourse has been rezoned.</p>	<p>The land on the southern side of the watercourse are not part of the Municipal wastewater treatment plant site so have not been included. They are part of a private Wastewater Treatment Plant which serves the Dairygold complex.</p>
<p>Mallow - MW-R-03, MW-R-04 and MW-AG-01 - Missing from table 10</p>	<p>The SFRA will be updated.</p>

Mallow – Existing Mixed/General Business/Industrial Uses to the southwest of the settlement – Missing from Table 10	The SFRA will be updated.
Mallow - An undeveloped area north of MW-GC-13 has failed the Justification test but has been re-zoned to less vulnerable Existing Mixed/ General Business/ Industrial use, but this is not appropriate in Flood Zone A.	See response to PADP400147309. See also Response to Key Issue in Kanturk Mallow MD in Section 3 of Volume One, Part 1 and Response to Key Issue on Water Management in Section 2 of Volume One, Part 1 of this Report.
Charleville - Existing Residential/Mixed Residential and Other Uses to the west of CV-GR-03 - Missing from Table 10	The SFRA will be updated.
Charleville - CV-I-01 - Missing from Table 10	The SFRA will be updated.
Charleville - Existing Mixed/General Business/Industrial Uses zoned lands to the west of CV-GR-03 - Missing from Table 10 Clarified with OPW that the comment should have referred to the Existing Mixed/General Business/Industrial Uses zoned lands to the north of CV-I-01.	The SFRA will be updated.
Newmarket - Existing Residential/Mixed Residential zoned lands to the west of NK-R-01 - Missing from Table 10	The SFRA will be updated.
Newmarket - Existing Residential/Mixed Residential zoned lands to the east of NK-B-01, NK-B-01 and NK-B-02 - Missing from Table 10	Clarified with the OPW that updated mapping no longer shows these areas at risk of flooding.
Liscarroll - C-01 - Missing from Table 10	The SFRA will be updated.
Carrigaline - Existing Residential/Mixed Residential lands and CL-R-06 - Missing from Table 16	The SFRA will be updated.
Passage West - Existing Residential/Mixed Residential lands - Missing from Table 16	The SFRA will be updated.
Crosshaven and Bays - Existing Residential/Mixed Residential lands - Missing from Table 16	The SFRA will be updated.
Ringaskiddy - Existing Residential/Mixed Residential lands - Missing from Table 16	The SFRA will be updated.
Ringaskiddy - RY-I-02 and RY-I-07- Missing from Table 16	The SFRA will be updated.
Ringaskiddy - Existing Mixed/General Business/Industrial Uses - Missing from Table 16	The SFRA will be updated.
Carrigtwohill - CT-R-03, CT-B-02 and CT-B-07 - Missing from Table 22	The SFRA will be updated.
Carrigtwohill - Existing Residential/Mixed Residential lands - Missing from Table 22	The SFRA will be updated.
Cobh - Existing Residential/Mixed Residential lands - Missing from Table 22	The SFRA will be updated.
Little Island - Existing Residential/Mixed Residential lands - Missing from Table 22	The SFRA will be updated.
Little Island - Existing Mixed/General Business/Industrial Uses - Missing from Table 22	The SFRA will be updated.
Glounthaune - GN-R-01 - Missing from Table 22	The SFRA will be updated.
Glounthaune - Existing Residential/Mixed Residential lands - Missing from Table 22	The SFRA will be updated.
Midleton - Existing Residential/Mixed Residential lands and MD-R-05 - Missing from Table 29	The SFRA will be updated.
Midleton - Existing Mixed/General Business/Industrial Uses - Missing from Table 29	The SFRA will be updated.
Youghal - Existing Residential/Mixed Residential lands - Missing from Table 29	The SFRA will be updated.
Cloyne - Existing Residential/Mixed Residential lands - Missing from Table 29	The SFRA will be updated.

Whitegate / Aghada - Existing Residential/Mixed Residential lands - Missing from Table 29	The SFRA will be updated.
Macroom - Existing Residential/Mixed Residential lands - Missing from Table 34	The SFRA will be updated.
Macroom - MM-X-01 - Missing from Table 34 Clarified with the OPW that this site is in Table 34 of the SFRA. They noted that "Table 34 states that the sequential approach is to be applied and development avoided in Flood Zones A and B. Reference might be made to objective on "Flood Risks-Overall Approach" as mitigation."	Please refer to the earlier explanation of our application of the sequential approach on sites with limited encroachment of flood zone A and / or B.
Macroom - Existing Mixed/General Business/Industrial Uses - Missing from Table 34	The SFRA will be updated.
Millstreet - Existing Residential/Mixed Residential lands - Missing from Table 34	The SFRA will be updated.
Millstreet - Existing Mixed/General Business/Industrial Uses - Missing from Table 34	The SFRA will be updated.
Béal Átha An Ghaorthaidh - Amendment 4.4.7.3 inserted wording regarding the most recent flood event occurring in 2009. The OPW has records of flood events from 2015 which have been provided by the local authority.	A minor modification is proposed to the text of amendment 4.4.7.3 to address this.
Bandon - Existing Residential/Mixed Residential lands and Existing Mixed/ General Business/ Industrial Uses - Missing from Table 36	The SFRA will be updated.
Bandon - Amendment 5.1.4.23 adds a Residential Reserve site but a small overlap with Flood Zone A exists and a highly vulnerable development in Flood Zone A is not appropriate unless a Plan Making Justification Test can be satisfied.	The CE has recommended this amendment not be adopted – See Volume One, Part 1 of this Report – Section 2.2.
Kinsale - Existing Residential/Mixed Residential lands - Missing from Table 36	The SFRA will be updated.
Clonakilty - Existing Mixed/General Business/Industrial Uses - Missing from Table 42	The SFRA will be updated.
Bantry - Existing Residential/Mixed Residential lands - Missing from Table 42	The SFRA will be updated.
Bantry - BT-I-01 - Missing from Table 42	The SFRA will be updated.
Bantry - BT-X-02 & BT-T-03 - The SFRA states that <i>Special Policy Area</i> BT-X-02, which overlaps with Flood Zone A has been partially rezoned to BT-T-03 and is now water compatible. As both BT-X-02 and BT-T-03 allow highly vulnerable <i>Residential</i> development, these zonings would be classed as highly vulnerable, and inappropriate unless a Justification Test, undertaken by the local authority has been applied and passed.	Proposed amendment number 5.2.6.7 proposes a new town centre zoning BT-T-03 for which a Justification Test has been carried out. See page 169 and 186-187 of the SFRA.  Amended zoning BT-X-02 now proposes to '...Support the redevelopment of the Inner Harbour for recreational, amenity, tourist related uses, having due regard to the protection of natural resources and amenities of the area.' These are considered water compatible uses.
Skibbereen - Existing Mixed/General Business/Industrial Uses - Missing from Table 42	The SFRA will be updated.
Dunmanway - DY-I-01 - Missing from Table 42	The SFRA will be updated.
Dunmanway - Existing Mixed/General Business/Industrial Uses - Missing from Table 42	The SFRA will be updated.
Castletownbere - CT-T-02 - Missing from Table 42	The SFRA will be updated.
Castletownbere - Existing Residential/Mixed Residential lands - Missing from Table 42	The SFRA will be updated.

	Schull - Existing Residential/Mixed Residential lands - Missing from Table 42	The SFRA will be updated.
	Goleen - X-02 - Missing from Table 42	The SFRA will be updated.
	<p>A number of amendments will require a minor modification to ensure that an asterisk is included in the zoning objective in the final Plan while a further number of amendments proposing to remove the * will need to be rejected.</p>	
<p><b>Chief Executive's Recommendation</b></p>	<p>Adopt Proposed Amendment 1.11.1 with No Modification.  Adopt Proposed Amendment 3.2.4.14 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.  Adopt Proposed Amendment 3.2.3.20 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification. See also Recommendation to Key Issue in Kanturk Mallow MD in Section 3 of Volume One, Part 1 and Recommendation to Key Issue on Water Management in Section 2 of Volume One, Part 1 of this Report.  Adopt Proposed Amendment 4.1.3.6 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.  Adopt Proposed Amendment 4.2.8.2 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.  Adopt Proposed Amendment 4.2.8.3 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.  Not to Adopt the Proposed Amendment 4.1.5.19 and Revert back to the Draft Plan.  Adopt Proposed Amendment 4.4.7.3 with Minor Modification. See Section 1.2 of Volume One Part 2 of this report for details of the Modification.  Not to Adopt the Proposed Amendment 5.1.4.23 and Revert back to the Draft Plan.  Not to Adopt the Proposed Amendment 5.2.8.12 and Revert back to the Draft Plan.</p>	

## 12 Chapter 12 Transport and Mobility

<b>Interested Party</b>	<b>Colum Murphy</b>
<b>Ref. No.</b>	PADP396282872
<b>Proposed Amendment No.</b>	1.12.1
<b>Submission Summary</b>	Submits that Cork City and County Councils need to let the Minister of Transport know how vital the M20 is for the region. States that the road is needed for safety and economic reasons. Submits that towns like Mallow, Charleville and Buttevant need to be bypassed in order to regenerate them and that much of the County Development Plan depends on this happening.
<b>Chief Executive's Response</b>	Proposed amendment 1.12.1 is to include a reference to the N/M20 as a major national project in the text of the Plan. This submission would seem to support this.
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.12.1 with No Modification.
<b>Interested Party</b>	<b>Cork Transport &amp; Mobility Forum</b>
<b>Ref. No.</b>	PADP401386470
<b>Proposed Amendment No.</b>	Multiple Proposed Amendments relating to several Chapters and Volumes of the Draft Plan. See summary below for Proposed Amendment numbers.
<b>Submission Summary</b>	<p>Submission sets out that the Transport and Mobility Forum, Cork is a representative group of organisations that have a common interest in sustainable travel, that the TMF fully supports sustainable modes of travel measures and policies and that sustainable travel helps reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.</p> <p>The submission primarily concentrates on the wider aspects of Transport and Travel, but also looks at the determining factors that shape transport patterns, like housing, densities of developments, locations of targeted growth and location of schools.</p> <p>Submits that the County Development Plan 2022-2028 is the means to shape the county (and commuting to the City) for decades to come and that it has the opportunity to create a spatial structure that is more sustainable in relation to daily travel and transport, as these are a result of functions such as the location of housing, employment, education and retail.</p> <p>Fully supports the emphasis on compact growth, higher densities and concentration of developments in places with high quality public transport accessibility. Outlines a concern it raised in its submission on the draft plan stating that the Draft CDP fell severely short of providing for the multitude of regional and local actions and objectives that would be necessary to begin to realise the above vision.</p> <p>States that while it supports the vast majority of amendments it has commented on, it is disappointed at the lack of solid commitments on improving density and permeability to produce truly compact, walkable sustainable low carbon communities. Submits that in the short term not everybody working in town centres will live close by, and also in return, not all residents of new centre-oriented developments will work locally, but that if we do not prioritise and incentivise communities where people can live, work, shop and socialise all within walking distance now that will never change. Submits that without those radical measures, the high level change mandated by the NDP and RSES cannot be achieved with dire implication for public health, the environment and our competitiveness.</p> <p>Points to the need to take substantial action to tackle climate change immediately and urgency in addressing high levels of diseases caused by lack of physical activity and by poor air quality, both an effect of over reliance on daily car travel. States that it is vital that</p>

daily travel distances by private car get drastically reduced, through better connectivity of sustainable travel modes, and by the right location of future developments. Finds that, in terms of concrete actions, the amendments address very few of the aforementioned challenges in particular in relation to achieving the required density and permeability of settlements and that a cross sectoral approach, e.g. relating to the Transportation chapter, cannot be seen to a sufficient extent.

Supports, with or without reservations detailed below, or strongly supports, the following Proposed Amendments:

Chapter 1:

Proposed Amendments no. 1.1.1, 1.1.2 and 1.1.3.

Chapter 2:

Proposed Amendments no. 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.14, 1.2.17 and 1.2.18.

Proposed Amendment no. 1.2.6 – supports but feels that the text does not firmly enough establish that compact growth contiguous to the town centre or core should be prioritised and constitute an absolute minimum of 30% of development in all urban centres and be far higher in the majority in cases rather than a minimum of 30% county wide. Suggests amending the Proposed Amendment text so that the approach it outlines applies to all settlements identified as having a population of 1,500 or greater in the last census.

Proposed Amendment no. 1.2.11 - supports the provision of a strategic reserve to meet higher than projected housing demand but raises a concern that all of these sites are proposed to be developed at densities far below the minimum of 75 units/ha which could be considered sustainable and are proposed to be low density suburban and car dependant developments.

Proposed Amendment no. 1.2.13 – welcomes increased clarity but raises a concern that the level of proposed compact growth in large town is far below the required 30% absolute minimum.

Chapter 3

Proposed Amendments no. 1.3.1, 1.3.2, 1.3.3, 1.3.4, 1.3.5, 1.3.6, 1.3.7, 1.3.8, 1.3.9, 1.3.10, 1.3.11, 1.3.12, 1.3.13 and 1.3.15.

Chapter 4

Proposed Amendments no. 1.4.2, 1.4.3, 1.4.4, 1.4.9 and 1.4.11.

Chapter 8

Proposed Amendment no. 1.8.1, 1.8.2, 1.8.6, 1.8.7, 1.8.8, 1.8.9, 1.8.10, 1.8.11, 1.8.14, 1.8.15, 1.8.16, 1.8.17, 1.8.18, 1.8.19, 1.8.21, 1.8.22, 1.8.23 and 1.8.27.

Proposed Amendment no. 1.8.24 - supports this on the basis of keeping employment, retail and residential development close to reduce commuting distances and notes the possible need for update to account of remote and blended working.

Chapter 9:

Proposed Amendments no. 1.9.1, 1.9.2, 1.9.3, 1.9.4, 1.9.5, 1.9.6, 1.9.7, 1.9.8, 1.9.9, 1.9.10, 1.9.11, 1.9.12, 1.9.15, 1.9.17 and 1.9.21.

Chapter 12

Proposed Amendments no.1.12.1, 1.12.2, 1.12.3, 1.12.5, 1.12.6, 1.12.7, 1.12.8, 1.12.9, 1.12.10, 1.12.11, 1.12.13, 1.12.14, 1.12.15, 1.12.16, 1.12.18, 1.12.19, 1.12.20, 1.12.21, 1.12.22, 1.12.24, 1.12.25, 1.12.26, 1.12.27, 1.12.28, 1.12.29, 1.12.30, 1.12.31, 1.12.32, 1.12.33, 1.12.34, 1.12.35, 1.12.36, 1.12.37, 1.12.38, 1.12.40, 1.12.41, 1.12.42, 1.12.44, 1.12.45, 1.12.46, 1.12.47, 1.12.48, 1.12.49, 1.12.50, 1.12.51, 1.12.52, 1.12.53, 1.12.54, 1.12.55, 1.12.58, 1.12.60, 1.12.61, 1.12.62 and 1.12.63.

Proposed Amendment no. 1.12.43 - states that, regarding terminology, measures such as

safety, attractive environment, greening of routes should also be deemed hard measures, as they are integral part of the physical design and that soft measures would rather be awareness campaigns.

Proposed Amendment no. 1.12.57 - states that any upgrade of the Cobh Cross junction shall also include dedicated infrastructure for cycling.

#### Chapter 17

Proposed Amendments no. 1.17.1 and 1.17.2.

#### Chapter 18

Proposed Amendments no. 1.18.3, 1.18.4, 1.18.6, 1.18.7, 1.18.9, 1.18.10, 1.18.11, 1.18.12, 1.18.13, 1.18.14, 1.18.15, 1.18.16

#### Chapter 19

Proposed Amendments no. 1.19.1, 1.19.2, 1.19.3, 1.19.4 and 1.19.5.

#### Volume 4:

Proposed Amendment no. 4.2.4.7, 4.2.8.2 and 4.2.8.4.

Does NOT support the following Proposed Amendments:

#### Volume 1:

Proposed Amendment no. 1.4.5 (amend wording of objective HOU 4-7 housing density on residential zoned land) - outlines benefits of compact growth, a central feature of national and regional planning policy. States that these benefits are only possible at higher residential population density generally above 75 units per hectare and not below 50 units/ha in combination with excellent pedestrian permeability and mixed use zoning.

Submits that the residential densities set out in table 4.5/4.7 (and table 4.1) are fundamentally low-density suburban car dominated densities with the possible exception of the "High" density. Submits that any move to confine "High" density zoning to only the very centre of larger towns must not be allowed to become part of the plan, that "High" density should be the norm for all development in all urban settlements and that the predominance of low-density suburban densities is fundamentally incompatible with compact growth and sustainable development.

Proposed Amendments no. 1.4.6, 1.4.7, 1.4.8, 1.4.10 and 1.12.17.

Proposed Amendment no. 1.8.3 - states that while it supports many aspects of this it cannot support this amendment which does not seek any form of link between the national rail network and a major port development and pharma cluster. Suggests that innovative solutions must be examined such as a link to the rail network at Marino Point via autonomous barge. States that it cannot support the references to building a motorway connection (M28) as it notes that the vast majority of traffic on the existing N28 is commuter not freight traffic.

Proposed Amendment no. 1.9.13 (retail: delete duplicate text on transport policy) – finds no such duplication and fears the deletion will weaken the protections intended.

Proposed Amendment no. 1.9.20 (retail: update to paragraphs 9.11.9 to 9.11.13 on retail outlet centres) - states that major retail developments should be confined to town centres and that destination shopping of a regional scale should be located in Cork City centre in line with TCR 9-4. Points to car dependency of out of town developments.

Proposed Amendment no. 1.12.59 - states that as the CCNP is a document that feeds into CMATS, it should be mentioned here, especially as it contained far higher mode share targets for active travel (cycling) than later documents.

Proposed Amendment no. 1.18.1 (additional wording to section on residential reserve) – submits that this is potentially ambiguous.

Proposed Amendment no. 1.18.2 (additional wording to objective ZU-18-12 residential reserve) – submits that good planning, sustainable development and the commitment in the National Planning Framework and the Regional Spatial & Economic Strategy to compact growth favours mixed use zoning over purely residential. Spatial separation of



	<p>residential, commercial and retail developments increases the distances required by people to travel to live their everyday life and as such drives congestion, increased energy usage and car dependency. For these reasons submits that strategic reserves should be zoned as mixed use rather than purely residential.</p> <p>Volume 4  Proposed Amendment no. 4.2.3.41 (Carrigtwohill: change CT-R-18 from Medium A density to Medium B density).  Proposed amendment no. 4.2.3.43 (Carrigtwohill: change density of CT-R-04 from High density to Medium A density).</p> <p>Additional comments:  Proposed Amendment no. 1.8.25 (update employment land supply figures in table 8.5) – submits that the proposed Table 8.5 should be subject to public consultation before adoption.  Proposed Amendment no. 1.9.16 (retail: new paragraph 9.5.7 Joint Retail Study for Metropolitan Cork) – submits that the proposed Table 8.5 should be subject to public consultation before adoption.  Proposed Amendment no. 1.9.19 (retail: additional text in section 9.9 requirement for future retail – metropolitan area) – submits that the proposed figures produced on the basis on the new Joint Retail Strategy should be subject to public consultation before adoption.  Proposed Amendment no. 1.8.26 (chapter 8 economic development: update employment land supply figures in table 8.6 ) - submits that the proposed Table 8.5 should be subject to public consultation before adoption.  Chapter 12 - Submits that it is pleased that many suggestions from the public consultation on the Draft CDP have led to Proposed Amendments in chapter 12 and that it supports most of them.  Submits that it is a disappointment that highly questionable modal share targets given in table 12.5 (Vol 1) shall remain unchanged adding that it is obvious that no differentiated consideration has been given to the potential that individual towns offer for a substantial modal shift to cycle traffic. Gives examples of towns with potential for a far higher cycle mode share. It adds that this contravenes established national and regional policy.  Volumes 3, 4 &amp; 5 North Cork, South Cork &amp; West Cork:  States that the vast majority of residential zoning throughout the county are for extremely low density car-dependent suburban developments and reiterates previous comments in relation to density.  Reiterates points made in a previous submission regarding a stated omission of any improvements for Active Travel connections, particularly cycling infrastructure, between Carrigaline and Ringaskiddy, that would materialise before the completion of the M28 motorway. Expresses disappointment that no amendments are proposed in this regard, referring in particular to objective RY-GO-05 and stating a view that this contravenes basic goals in the CDP’s transportation chapter – as well as national policy objectives.  Submission also includes 4 appendices regarding sustainable transport hierarchy of provision, Tables of population required to support various services and the number of such services likely to be found within walking distance at different density and permeabilities, example of permeability metric calculation/audit and Cork Transport and Mobility Forum Priorities to reduce Transport emissions.</p>
<p><b>Chief Executive's Response</b></p>	<p>The support for the following Proposed Amendments is noted, as are the additional comments made in the submission in relation to these Proposed Amendments:</p> <p>Chapter 1:  Proposed Amendments no. 1.1.1, 1.1.2 and 1.1.3.</p> <p>Chapter 2:</p>

	<p>Proposed Amendments no. 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.14, 1.2.17 and 1.2.18.</p> <p>With regard to Proposed Amendment no. 1.2.6, the Planning Authority, in identifying land to meet the growth targets for the settlements has aligned with national policy regarding compact growth and aims to deliver at least 30% of the overall net housing requirement in or contiguous to the town centre or core and to identify key locations and opportunity sites, which are capable in terms of physical and social infrastructure, of being delivered over the lifetime of the plan period. The plan does not zone residential development within the boundaries of villages less than 1,500 population.</p> <p>With regard to Proposed Amendment 1.2.11, in relation to housing density, Cork County Council’s approach in applying densities to towns and key villages is broadly in line with the objectives of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and Sustainable Residential Guidelines incorporating active travel.</p> <p>Proposed Amendment no. 1.2.13 – see response under Proposed Amendment 1.2.6 above.</p> <p>See also responses to submissions PADP401372742, PADP401337641, PADP401445300 in Vol 2, Part 1 of this report.</p> <p>Chapter 3</p> <p>Proposed Amendments no. 1.3.1, 1.3.2, 1.3.3, 1.3.4, 1.3.5, 1.3.6, 1.3.7, 1.3.8, 1.3.9, 1.3.10, 1.3.11, 1.3.12, 1.3.13 and 1.3.15.</p> <p>Chapter 4</p> <p>Proposed Amendments no. 1.4.2, 1.4.3, 1.4.4, 1.4.9 and 1.4.11.</p> <p>Chapter 8</p> <p>Proposed Amendment no. 1.8.1, 1.8.2, 1.8.6, 1.8.7, 1.8.8, 1.8.9, 1.8.10, 1.8.11, 1.8.14, 1.8.15, 1.8.16, 1.8.17, 1.8.18, 1.8.19, 1.8.21, 1.8.22, 1.8.23, 1.8.24 and 1.8.27.</p> <p>Chapter 9:</p> <p>Proposed Amendments no. 1.9.1, 1.9.2, 1.9.3, 1.9.4, 1.9.5, 1.9.6, 1.9.7, 1.9.8, 1.9.9, 1.9.10, 1.9.11, 1.9.12, 1.9.15, 1.9.17 and 1.9.21.</p> <p>Chapter 12</p> <p>Proposed Amendments no.1.12.1, 1.12.2, 1.12.3, 1.12.5, 1.12.6, 1.12.7, 1.12.8, 1.12.9, 1.12.10, 1.12.11, 1.12.13, 1.12.14, 1.12.15, 1.12.16, 1.12.18, 1.12.19, 1.12.20, 1.12.21, 1.12.22, 1.12.24, 1.12.25, 1.12.26, 1.12.27, 1.12.28, 1.12.29, 1.12.30, 1.12.31, 1.12.32, 1.12.33, 1.12.34, 1.12.35, 1.12.36, 1.12.37, 1.12.38, 1.12.40, 1.12.41, 1.12.42, 1.12.44, 1.12.45, 1.12.46, 1.12.47, 1.12.48, 1.12.49, 1.12.50, 1.12.51, 1.12.52, 1.12.53, 1.12.54, 1.12.55, 1.12.58, 1.12.60, 1.12.61, 1.12.62 and 1.12.63.</p> <p>Proposed Amendment no. 1.12.43 – It is accepted that measures such as safety, attractive environment, greening of routes may not be considered to be soft measures and as such a minor modification of the Proposed Amendment is proposed to delete the word ‘soft’.</p> <p>Proposed Amendment 1.12.46 – it is noted that the proposed reference to a footnote should refer to the TM 12.12 footnote. A minor modification is proposed to correct this.</p>
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Proposed Amendment no. 1.12.57 – It is not proposed to include additional wording in the plan to state that any upgrade of the Cobh Cross junction shall also include dedicated infrastructure for cycling. This would be considered to be a material modification of the Proposed Amendment and as such cannot be considered at this stage. Note that there is currently a Part 8 process underway (Part 8 Proposed Carrigtwohill Urban Regeneration and Development Fund (URDF) Initiative – Public Realm Infrastructure Bundle, Carrigtwohill, Co. Cork which includes proposals regarding Cobh Cross Junction <https://www.corkcoco.ie/en/planning/housing-infrastructure-implementation-team/public-consultation-part-8s>).

Chapter 17

Proposed Amendments no. 1.17.1 and 1.17.2.

Chapter 18

Proposed Amendments no. 1.18.3, 1.18.4, 1.18.6, 1.18.7, 1.18.9, 1.18.10, 1.18.11, 1.18.12, 1.18.13, 1.18.14, 1.18.15, 1.18.16

Chapter 19

Proposed Amendments no. 1.19.1, 1.19.2, 1.19.3, 1.19.4 and 1.19.5.

Volume 4:

Proposed Amendment no. 4.2.4.7, 4.2.8.2 and 4.2.8.4.

Other Proposed Amendments which are not supported or where a modification is requested are as follows:

Chapter 4:

Proposed Amendment 1.4.5, 1.4.6, 1.4.7, 1.4.8, 1.4.10: Cork County Council's approach in applying densities to towns and key villages is broadly in line with the objectives of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and Sustainable Residential Guidelines incorporating active travel. The changes requested cannot be considered at this stage of the review process. Regarding 1.4.6, see Response to Submission PADP400575617, in Volume 2, Part 1, Chap 4 of this Report.

Chapter 8:

Proposed Amendment 1.8.3: The points raised are noted. The M28 has been subject to its own consent process.

Chapter 9:

Proposed Amendment 1.9.13: Objective TM12.8 in Chapter 12 Transport and Mobility requires the submission of Mobility Management Plans for larger developments and as such inclusion of a similar objective in this section is considered to be unnecessary duplication and therefore it is proposed to delete text from the Draft Plan.

Proposed Amendment 1.9.20: Please see CE response, regarding Town Centres and Retail, to the submission from the OPR in Volume One, Part 1 of this report.

Chapter 12:

	<p>Proposed Amendment 1.12.17 - this is to delete an objective regarding the preparation of local transport plans to avoid duplication – the objective will remain in the Plan under TM 12-1 Integration of Land Use and Transport, g).</p> <p>Proposed Amendment no. 1.12.59 - the Cork Cycle Network Plan informed CMATS but, nevertheless, it is superseded by CMATS.</p> <p>In relation to the concern regarding mode share targets used in the Draft Plan see Chapter 12 Transport and Mobility, Key Issue in Volume One, Part 1 of this report.</p> <p>Chapter 18:</p> <p>Proposed Amendment no. 1.18.1 – this refers to adding in County towns where there is now Residential Reserve whereas in the Draft Plan, Residential Reserve zonings were only in specified towns in Metropolitan Cork. It is not proposed to modify this Proposed Amendment.</p> <p>Proposed Amendment no. 1.18.2 – this is subject to a minor modification arising from the submission from the OPR which further expands on the zoning objective for Residential Reserve. See Response to OPR Submission in Key Issues Section of Volume One, Part 1 of this Report.</p> <p>Volume 4</p> <p>Proposed Amendment no. 4.2.3.41 (Carrigtwohill: change CT-R-18 from medium A density to medium B density).</p> <p>Proposed amendment no. 4.2.3.43 (Carrigtwohill: change density of CT-R-04 from high to medium A).</p> <p>In relation to both of these Proposed Amendments see the response to the OPR submission in Volume One, Part 1 of this Report.</p> <p>Other comments:</p> <p>The submission raises concerns regarding density. As outlined above, Cork County Council’s approach in applying densities to towns and key villages is broadly in line with the objectives of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and Sustainable Residential Guidelines incorporating active travel.</p> <p>Other comments that do not relate to any Proposed Amendment, while noted, cannot be considered further at this stage.</p>		
<p><b>Chief Executive's Recommendation</b></p>	<p>Adopt the following Proposed Amendments with No Modification:</p>		
	<p>1.1.1</p> <p>1.1.2</p> <p>1.1.3</p> <p>1.2.1</p> <p>1.2.14</p> <p>1.2.17</p> <p>1.2.18</p> <p>1.3.1</p>	<p>1.8.27</p> <p>1.9.1</p> <p>1.9.2</p> <p>1.9.3</p> <p>1.9.4</p> <p>1.9.5</p> <p>1.9.6</p> <p>1.9.7</p>	<p>1.12.34</p> <p>1.12.35</p> <p>1.12.36</p> <p>1.12.37</p> <p>1.12.38</p> <p>1.12.40</p> <p>1.12.41</p> <p>1.12.42</p>

1.3.2	1.9.8	1.12.44
1.3.3	1.9.9	1.12.45
1.3.4	1.9.10	1.12.47
1.3.5	1.9.11	1.12.48
1.3.6	1.9.12	1.12.49
1.3.7	1.9.13	1.12.50
1.3.8	1.9.15	1.12.51
1.3.9	1.9.17	1.12.52
1.3.10	1.9.21	1.12.53
1.3.11	1.12.1	1.12.54
1.3.12	1.12.2	1.12.55
1.3.13	1.12.3	1.12.57
1.3.15	1.12.5	1.12.60
1.4.2	1.12.6	1.12.61
1.4.3	1.12.7	1.12.62
1.4.4	1.12.8	1.12.63
1.4.5	1.12.9	1.17.1
1.4.7	1.12.10	1.17.2
1.4.8	1.12.11	1.18.1
1.4.10	1.12.13	1.18.3
1.4.11	1.12.14	1.18.4
1.8.1	1.12.15	1.18.6
1.8.2	1.12.16	1.18.7
1.8.3	1.12.17	1.18.9
1.8.6	1.12.18	1.18.10
1.8.7	1.12.19	1.18.11
1.8.8	1.12.20	1.18.12
1.8.9	1.12.21	1.18.13
1.8.10	1.12.22	1.18.14
1.8.11	1.12.24	1.18.15
1.8.15	1.12.25	1.18.16
1.8.16	1.12.26	1.19.1
1.8.17	1.12.27	1.19.2
1.8.18	1.12.28	1.19.3

1.8.19	1.12.29	1.19.4
1.8.21	1.12.30	1.19.5
1.8.22	1.12.31	4.2.4.7
1.8.23	1.12.32	See also recommendations in Volume 1, Part 2
1.8.24	1.12.33	
<p>Adopt the following Proposed Amendment with minor modification: 1.12.43 See Section 1.2 of Volume One, Part 2 of this report for details of the Modification.</p> <p>Adopt the following Proposed Amendment with minor modification: 1.12.46 See Section 1.2 of Volume One, Part 2 of this report for details of the Modification.</p> <p>Adopt the following Proposed Amendment with minor modification: 1.12.58 See Section 1.2 of Volume One, Part 2 of this report for details of the Modification.</p> <p>Adopt the following Proposed Amendment with minor modification: 1.12.59 See Section 1.2 of Volume One, Part 2 of this report for details of the Modification.</p> <p>Core Strategy Proposed Amendments 1.2.2, 1.2.3, 1.2.4, 1.2.6, 1.2.11, 1.2.13: see Recommendations to submissions PADP400772237, PADP401372742, PADP401337641, PADP401445300, in Volume Two, Part 1, Ch. 2 of this Report.</p> <p>Proposed Amendment 1.4.6, see Response to Submission PADP400575617, in Volume Two, Part 1, Ch. 4 of this Report.</p> <p>Proposed Amendment 1.4.9, see response to submission PADP401348006, in Volume Two, Part 1, Ch. 4 of this Report.</p> <p>Proposed Amendment 1.9.20, see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment no. 1.18.2: see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment no. 4.2.3.41: see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed amendment no. 4.2.3.43: see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed amendment no. 1.8.14: see Recommendation to Submission PADP401346482 in Volume Two, Part 1, Ch. 8 of this Report.</p> <p>Proposed Amendment 4.2.8.2: see response to submission PADP401448816, in Volume Two, Part 2, Cobh MD of this Report.</p> <p>Proposed Amendment 4.2.8.4: see response to submission PADP401443534 and PADP401448816, in Volume Two, Part 2, Cobh MD of this Report.</p> <p>See also recommendations in Volume 1, Part 2 of this Report.</p> <p>In relation to comments which do not relate to Proposed Amendments no further action is required.</p>		
<b>Interested Party</b>	<b>daa</b>	

<b>Ref. No.</b>	PADP401286774
<b>Proposed Amendment No.</b>	Proposed Amendments 1.12.39 and 1.13.4
<b>Submission Summary</b>	<p>The submission, on behalf of Cork Airport, welcomes the Proposed Amendments to the Draft Cork County Development Plan 2021 and the preparation of a new County Development Plan – with specific reference to proposed amendments 1.12.39 and 1.13.4 relating to Cork Airport and its associated infrastructure.</p> <p>States that the daa welcomes further engagement with Cork County Council with regards to the County Development Plan and would be happy to meet to provide technical advice as required. In addition, it recommends consultation with the IAA and the IAA-ANSP in this regard.</p>
<b>Chief Executive's Response</b>	The daa's support for proposed amendments 1.12.39 and 1.13.4 is noted.
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendments 1.12.39 with No Modification.</p> <p>Adopt Proposed Amendments 1.13.4 with No Modification.</p>
<b>Interested Party</b>	<b>Department of Transport</b>
<b>Ref. No.</b>	PADP397782066
<b>Proposed Amendment No.</b>	1.12.6, 1.12.7, 1.12.8, 1.12.9
<b>Submission Summary</b>	The Department makes reference to recent policy documents of relevance to accessible and integrated public transport. In that context it refers to a number of proposed amendments to Chapter 12 which it notes/welcomes. Specifically, it welcomes the Proposed Amendment (1.12.6) to include additional text outlining examples of actions regarding the National Disability Inclusion Strategy 2017-2022, it notes the Proposed Amendment (1.12.7) to include a reference to the 2020 DMURS Interim Advice Note - Covid 19 Pandemic Response and it states that references in the Draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note, it welcomes the Proposed Amendment (1.12.8) to include additional text explaining the 'whole journey' approach to public transport and it also notes the Proposed Amendment (1.12.9) to include additional text setting out key priorities in relation to the Local Link Rural Transport Programme.
<b>Chief Executive's Response</b>	The Department's support for Proposed Amendments 1.12.6 and 1.12.8 and its noting of Proposed Amendments 1.12.7 and 1.12.9 is acknowledged.
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendment 1.12.6 with No Modification.</p> <p>Adopt Proposed Amendment 1.12.7 with No Modification.</p> <p>Adopt Proposed Amendment 1.12.8 with No Modification.</p> <p>Adopt Proposed Amendment 1.12.9 with No Modification.</p>
<b>Interested Party</b>	<b>National Transport Authority</b>
<b>Ref. No.</b>	PADP401396294
<b>Proposed Amendment No.</b>	1.4.5, 1.4.6, 1.4.7, 1.4.8, 1.8.17, 1.9.16, 1.9.20, 1.12.35, 1.12.58, 1.12.59, 4.1.3.20.
<b>Submission Summary</b>	<p>This submission makes a number of recommendations in relation to the Proposed Amendments to the Draft Plan as well as in relation to the Draft Plan as follows:</p> <p>Volume 1:</p>

#### Chapter 4 Housing

Proposed Amendments 1.4.5, 1.4.6, 1.4.7 and 1.4.8 - Submission notes the proposed amendments, where reference is now made to 'larger towns with a population of >1500' in relation to the application of the minimum net density of 50 DPH but reiterates concerns that it submits have not been addressed regarding housing density, stating that whilst it is stated that higher densities (>50dph) are provided for in metropolitan area towns, in town centres and locations which are deemed to be 'close to' existing or proposed high quality public transport corridors, no spatial definition has been provided which allows for a clear determination of those sites / areas deemed to be in close proximity to public transport. It makes reference to Section 5.8 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas in this regard. It recommends that commitment is made to the spatial definition of areas to which the 'High' residential density is applied with this definition more appropriately applied based on the preparation of local transport plans.

#### Chapter 8 Employment Development

Proposed Amendment No. 1.8.17 - Recommends that further explanation is required as to what constitutes an appropriate location within the main towns and strategic employment locations and the criteria that would typically be applied, taking into consideration employment density and operational requirements.

#### Chapter 9 Town Centres and Retail

Proposed Amendment No. 1.9.16 - Questions the delay to the completion of the Draft Joint Retail Strategy and Study which led to an expectation of a coordinated and complementary approach between the Councils, and recommends that specific reference is made to a commitment to consult with key stakeholders, including the NTA and TII, during the course of the preparation of the Joint Retail Strategy and Study. States that NTA has not been consulted with during the preparation of the study.

Proposed Amendment 1.9.20 - Notes the proposal to replace text with a statement that the Council is satisfied with the findings of a Study undertaken in 2019 on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area and submits that it does not consider that the study referenced in the proposed amendment provides a satisfactory basis for the Development Plan's provision for a Retail Outlet Centre, as outlined. Restates part of a previous submission on Variation No.2 of the County Development Plan in November 2019 including a view that the formulation of policy relating to retail outlet centres would be best undertaken as part of a review of the Metropolitan Cork Joint Retail Strategy, that the basis for the identification of appropriate locations would be more appropriately based on a more extensive area than that of the Cork Metropolitan Area, and a concern regarding the manner in which public transport accessibility was applied as part of the multi-criteria analysis used in the corridor selection process and the assumed mode share figures, adding that the siting of what the Study confirms to be a mainly car-based form of retail development on a national road with capacity constraint issues should be reconsidered, based on its inconsistency with national policy. Reiterates the need to take the Retail Planning Guidelines 2012 and the Spatial Planning and National Roads Guidelines 2012 into consideration, highlighting particular provisions. Recommends that it would be prudent for the Council to revise this proposed amendment, highlighting the need to a review of "Study on the Requirement for Retail Outlet Centre(s) in the Cork Metropolitan Area" to reflect current national transport and land use policies, the Climate Action Plan 2021 objectives as they relate to Spatial and Planning Policy, the constraints and strategic requirements of the N25 and to be informed by the Joint Metropolitan Area Retail Strategy.

#### Chapter 12 Transport and Mobility

Draft Plan - Objective TM12-1 Integration of Land Use and Transport (d) - Reiterates a concern raised in submission to Draft Plan relating to the statement in Objective TM12-



1(d) that in regards to provision within the Metropolitan Area for trip intensive developments in locations which are not well served by existing or proposed high capacity public transport, it is not clear what 'limited planned circumstances' might apply, which would justify this. Submits that this has not been a consideration of the proposed amendments and recommends that the provision be removed from the Draft Plan.

Draft Plan - Objective TM12.9 Parking - Reiterates previous recommendation to Draft Plan that the Draft Development Plan's approach to the restriction of residential parking provision as outlined in point b) may need to be coupled with an area-based approach to parking management in order to minimise any impact such restrictions might have on over spill (on-street) parking and also suggests the inclusion of an objective which provides for the development of town centre parking management plans, relating to both on-street and off-street parking, as a basis for the determination of the most appropriate level of parking and location of parking facilities and taking other transport objectives (including the operation of public transport services, walking and cycling) into consideration. Recommends that both matters are included in Objective TM12.9.

Proposed Amendment No. 1.12.35 - Submission notes proposed amendment to TM 12-11 b) and recommends an amendment to point d) regarding specific EV charging provision and residential development.

Proposed Amendment No. 1.12.58 - Recommends that engagement with NTA is added to text regarding any integration of cycleways and walkways with the existing rail stations along the eastern rail corridor.

Proposed Amendment No. 1.12.59 - Recommends minor correction of heading of table 12.2.

Draft Plan - Section 12.5 Avoid-Shift-Improve Framework - Reiterates request made in submission to Draft Plan that cycle mode share targets specified for the towns should be subject to review, and with the benefit of the preparation of Local Transport Plans for the Metropolitan Area towns.

Draft Plan Paragraphs 12.5.5 – 7 and Table 12.5 (2028 Target Share for Commuting to Work) – reiterates view expressed in submission to Draft Plan that it is unclear how the 2028 mode shares for each of the towns listed in Table 12.5 have been derived, based on the explanation provided in paragraphs 12.5.5-7. Also notes that when determining the car mode share (a standardised 60%), no distinction has been made between the Metropolitan Area towns and those in other parts of the county. Questions public transport mode share targets. Recommends that a profiling of travel patterns is undertaken, through an interrogation of existing transport data in order to better understand transport demand and associated travel patterns and what influences/determines them and to inform the formulation of land use policies which affect more sustainable travel pattern outcomes, as well as the identification / prioritisation of transport infrastructure and services needed to meet future travel demand at inter settlement level.

VOLUME 4, South Cork, Carrigaline

Proposed Amendment No. 4.1.3.20 (Amend text to Fernhill Urban Expansion Special Policy Area – Carrigaline). Notes that the proposed new objective provides for the preparation of a framework masterplan and the statement that the local authority will consider the identification of these lands for more detailed planning over the lifetime of the Plan.

Reiterates a recommendation previously made that any further urban extension being considered for Carrigaline, including the subject lands, should be limited in extent and be informed by the need to clearly demonstrate how they can be developed in a permeable manner for bus services, providing good connectivity to the town centre / other local destinations, as well as Cork City and Ringaskiddy. States that would be best informed by

	<p>the preparation of a Local Transport Plan for the town as a whole, based on the ABTA approach set out in the NTA/TII Advice Note and Pilot Methodology.</p> <p>Draft Plan - Objective CL-GO-12 Western Outer Relief Road. Reiterates a view expressed in a submission to the Draft Plan that it does not consider that it has been demonstrated how the objective to provide a Western Outer Relief Road is consistent with the Draft Plan's Objective TM12-1 (Integration of Land use and Transport). Reiterates a concern that is not clearly demonstrated why this road would be required to meet the anticipated growth in transport demand in a manner which supports the use of sustainable transport and that supports the consolidation of future development.</p>
<p><b>Chief Executive's Response</b></p>	<p>Chapter 4 In relation to Proposed Amendments 1.4.5, 1.4.6, 1.4.7 and 1.4.8 Cork County Council's approach in applying densities to towns and key villages is broadly in line with the objectives of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and Sustainable Residential Guidelines incorporating active travel. The changes requested cannot be considered at this stage of the review process. Proposed Amendment 1.4.6: see Response to Submission PADP400575617, in Volume Two, Part 1, Ch. 4 of this Report.</p> <p>Chapter 8 Proposed Amendment No. 1.8.17: The appropriateness of a location will be considered in the round in any given case having regard to all the provisions of the Plan as a whole, the location, land use zoning, nature of what is proposed in terms of scale and use etc. and having regard to the Employment Network set out in Table 8.4.</p> <p>Chapter 9 Proposed Amendment No. 1.9.16 - see response provided to the OPR submission in Volume One, Part 1 of this Report. Proposed Amendment No. 1.9.20 - see response provided to the OPR submission in Volume One, Part 1 of this Report.</p> <p>Chapter 12 Transport and Mobility: The submission raises a concern relating to the statement in Objective TM12-1(d). Contrary to what the submission states this concern has been addressed in Proposed Amendment 1.12.24.</p> <p>In relation to Objective TM 12.9 and a recommendation made to the Draft Plan regarding the approach to the restriction of residential parking provision and town centre parking management plans, this recommendation does not relate to any Proposed Amendment and therefore while the issues raised are noted, they cannot be considered further at this stage. Notwithstanding this, the Planning Authority would like to bring the following Proposed Amendments to the attention of the NTA: Proposed Amendment 1.12.30 is to add new text to the end of paragraph 12.12.8 to state that where a Local Transport Plan exists, it may determine the appropriate level of car parking provision. Proposed Amendment 1.12.62 is to add new text stating that the Council will monitor town centre parking provision to ensure that on-street parking does not negatively impact the placemaking and sustainable mobility aims of this County Development Plan. If deficiencies in specific areas arise the Council will seek to address them through the development management process and by the provision of adequate off-street public parking.</p> <p>The NTA seeks a modification of Proposed Amendment 1.12.35 in relation to EV charging provision. As this is not a minor modification it cannot be considered at this stage. However, TM 12.11 a) requires that infrastructure for Electric Vehicles will be integrated</p>

	<p>into developments in line with national requirements. This ensures that at all times over the lifetime of the Plan the requirements of this evolving national policy will apply.</p> <p>In relation to Proposed Amendment 1.12.58 a modification is recommended to add that the Council will engage with the NTA regarding any integration of cycleways and walkways with the existing rail stations along the eastern rail corridor. This already occurs as part of normal procedures and is considered to be a minor modification.</p> <p>A minor modification to Proposed Amendment 1.12.59 is proposed to correct the heading of table 12.2.</p> <p>In relation to the issue of the commuting mode share targets used in the Draft Plan, which were not the subject of a Proposed Amendment, see Key Issue in Volume One, Part 1 of this Report.</p> <p>Volume 4</p> <p>The submission raised issues in relation to Carrigaline and Proposed Amendment 4.1.3.20. Carrigaline is the largest town in the County and has experienced significant population and housing growth over a long period of time. Also, there is a lack of sufficient employment land within the town which influences the high car dependency. IDA have indicated that there is a requirement to identify additional employment lands in the area. The proposal to develop the Fernhill Urban Expansion Special Policy Area is a prudent and strategic response to these strategic issues ensuring that future housing and employment land supply is properly planned for over the lifetime of the Plan. The objective of the Special Policy Area is to prepare a Framework Masterplan which will decide the allocation of uses within the area. However, the main uses under consideration will be Recreational and Amenity Areas, Residential/Residential Reserve, Business and High Technology Campus areas. The overall mix of uses and their extent, and location will be decided in the preparation of the Framework Masterplan which will aim to achieve a balance between the various uses identified. A detailed landscaping scheme is to form part of the Framework Masterplan to identify an area within the Fernhill Urban Expansion Special Policy Area to make provision for a distinctive separation between the settlements of Carrigaline and Ringaskiddy.</p> <p>The proposal has been fully assessed as part of the preparation of the Carrigaline Transport and Public Realm Strategy (TPREP) to ensure that it has strong sustainable walking and cycling links with the town and the town centre to encourage modal shift away from cars.</p> <p>Development of these lands will be subject to the opening of the M28 and the preparation of a Framework Plan which will address the issues raised and will be subject to a Variation to the County Development Plan 2022-2028.</p> <p>The Local Authority consider the identification of these lands for more detailed planning over the lifetime of the Plan is a prudent proper planning approach to help guide the future development of Carrigaline in a sustainable manner and in consultation with key stakeholders including NTA and TII.</p> <p>See also responses to multiple submissions in Volume Two, Part 2, Carrigaline MD in this Report.</p>
<p><b>Chief Executive's Recommendation</b></p>	<p>Adopt Proposed Amendment 1.4.5 with No Modification.</p> <p>Adopt Proposed Amendment 1.4.7 with No Modification.</p> <p>Adopt Proposed Amendment 1.4.8 with No Modification.</p> <p>Adopt Proposed Amendment 1.8.17 with No Modification.</p> <p>Adopt Proposed Amendment 1.12.24 with No Modification.</p> <p>Adopt Proposed Amendment 1.12.35 with No Modification.</p>

	<p>Adopt Proposed Amendment 1.12.58 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p> <p>Adopt Proposed Amendment 1.12.59 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p> <p>Proposed Amendment 1.4.6, see Recommendation to Submission PADP400575617, in Volume Two, Part 1, Ch. 4 of this Report.</p> <p>Proposed Amendment No. 1.9.16 - see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report</p> <p>Proposed Amendment 1.9.20: see Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Carrigaline and Proposed Amendment 4.1.3.20: See responses to multiple submissions in Volume Two, Part 2, Carrigaline MD in this Report.</p> <p>In relation to comments which do not relate to Proposed Amendments no further action is required.</p>
<b>Interested Party</b>	<b>Transport Infrastructure Ireland</b>
<b>Ref. No.</b>	PADP400492339
<b>Proposed Amendment No.</b>	Multiple Proposed Amendments relating to several Chapters and Volumes of the Draft Plan. See summary below for Proposed Amendment numbers.
<b>Submission Summary</b>	<p>The submission relates to a number of proposed amendments and other issues in Volumes 1, 3, 4 and 5 of the Draft Plan as follows:</p> <p>Volume 1:</p> <p>1.2.20 (Table setting out residential land NPF tiering, appendix D) – submits that NPF revisions and DoT funding will impact a number of towns in the County and that Local Transport Plans need to reflect national policy change and consequential funding changes in the new development plan cycle. Advises that measures to facilitate private development are for the Council to address and are not TII priorities and recommends that the Council provide for same in its general development contribution scheme. Also recommends a review of LTPs that have been completed or commenced, and consultation with TII regarding same.</p> <p>1.12.53 (Additional text referencing spatial planning and national roads guidelines in the context of motorway service areas) – recommends that amendment no 1.12.53 should be amended to include the statutory requirements associated with Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities relating to the provision of service areas and roadside facilities to reflect Section 28 national policy rather than TII policy.</p> <p>1.5.8 (replaces and updates figure 5.1 rural housing policy area types) – supports inclusion of this and advises that the map should be revised to include national roads for clarity purposes.</p> <p>1.6.9 (additional wording in section 6.4, paragraph 6.4.6 regarding schools) – in relation to reduced requirements for parking and set down areas TII recommend additional wording ('subject to public and road safety concerns') so that road safety is not undermined.</p> <p>1.8.4 (Include additional text after section 8.7.16 in relation to the review of employment lands) – TII supports this statement but requests clarification of the process which will be</p>

undertaken and details of consultation exercise which will be undertaken in view of the requirements for sustainable transport and stakeholders.

1.8.18 (New objective on business development in rural areas) - TII acknowledges business development in rural areas and the requirement for rural communities need to be sustained. It requests that official transport policy and inclusions in relation to the extensive national road network in the County, public safety and in the interests of advising applicants/developers of such policy provisions at the earliest stage of their pre-planning is addressed for clarity in this amendment.

1.9.16 (New paragraph 9.5.7 joint retail study for metropolitan cork) - notes reference to the preparation of a Joint Retail Study for the Metropolitan Area. Raises concern that the approach adopted in the draft development plan for retail is at variance with specific aspects of national policy and guidelines and with the existing known constraints on capacity and safety of the national road infrastructure within Cork. Requests that this amendment is postponed until public/stakeholder consultation on the Joint Retail Study for the Metropolitan Area has been commenced/concluded to ensure that the requirement of Section 4.11.4 of the Retail Planning Guidelines, 2012 and the protection of strategic national road network have been achieved.

1.9.20 (Update to paragraphs 9.11.9 to 9.11.13 on retail outlet centres) – reminds the Council that the NPF indicates a need to improve regional connectivity in tandem with targeted urban growth strategies for Cork, Limerick, and Waterford and to maintain the strategic capacity and safety of the national roads network including planning for future capacity enhancement. TII seeks to ensure that these objectives are not undermined and references the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

With respect to Retail Outlet Centres or Outlet Centres as described in Section 4.11.4 of the Retail Planning Guidelines, TII highlights that the Retail Planning Guidelines, 2012, establish that the presumption against large out-of-town retail centres located adjacent or close to existing, new, or planned national roads/motorways with no exception to this policy applied to “Outlet Centres” which are large out of town retail centres with a significant reliance on the private car.

TII raises issues of known and acknowledged capacity constraints and safety concerns associated with the N25 corridor and Cobh Cross Junction, detailing extracts from N25 Carrigtwohill to Midleton Upgrade Scheme, Project Appraisal Plan as well as Council correspondence to TII.

Submits that this amendment is supported by a draft report entitled “Study on the Requirement for Retail Outlet Centre(s) in the Cork Metropolitan Area” and reiterates points, previously submitted to the Planning Authority, regarding its content and findings including in relation to Traffic Impact on National Roads, Multi-Criteria Analysis and Corridor Selection, N25 Retail Outlet Centres Location.

It submits that a land use of a scale and typology such as a Retail Outlet Centre on the N25 corridor would impact adversely on capacity and safety of the N25 and associated junctions on a route with acknowledged constraints related to capacity operation and safety and that the proposed amendment is at variance in its current form with national regional and local transport and land use policy, making reference to the following:

- Project 2040 National Strategic Outcome no 2 Enhanced Regional Accessibility (page 140 National Planning Framework) indicates the need for “Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancement.”
- Sections 2.5, 2.7 and 2.9 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

- Section 4.11.4 of the Retail Planning Guidelines, 2012, establish that there should be a general presumption against large out-of-town retail centres those located adjacent or close to existing, new, or planned national roads/motorways.

Submits that , given the importance of the N25 to Cork County and its community, economic and social at this time, it would be prudent of the planning authority to omit this amendment as included and establish a new objective in the future which seeks a review and update the “Study on the Requirement for Retail Outlet Centre(s) in the Cork Metropolitan Area to reflect current national transport and land use policies, the well-known constraints and strategic requirements of the N25, as well as to be informed by the joint metropolitan retail strategy.

1.10.17 (Insert a part f to objective to 10-10 tourism facilities referring to small agri-tourism accommodation) - TII acknowledges agri-businesses and the requirement for rural communities to be sustained and request that official transport policy and inclusions regarding transport provision is addressed in this amendment in relation to the extensive national road network in the County, public safety and in the interests of advising applicants/developers of such policy provisions at the earliest stage of their pre-planning. It makes reference to Section 2.5 of DoECLG Spatial Planning and National Roads Guidelines.

Volume 1, Other Issues:

In relation to potential route corridors TII advises that in relation to national road schemes, the Spatial Planning and National Roads for Planning Authorities DoHLG Guidelines states; “Development objectives, including the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified and brought to the attention of the planning authority.” and TII submits that section 12.16.4 of the Draft Plan does not address this in its reference to where the route selection process has been completed/approved and where preferred route corridors have been identified.

In relation to the requirement for a Traffic Impact Assessment or Road Safety Audit in certain development objectives of the Draft Plan (denoted by ^) TII advise that the approach to be taken in the Section 28 Guidelines advocates a forward planning plan led approach and request that clarification be included in the amended draft development plan text to explain the evidence base for the areas in question and the statutory forward planning approach proposed for these sites/zoning with ^ symbol to ensure compliance with the Spatial Planning and National Roads Guidelines for Planning Authorities. Such an approach would also provide clarity for members of the public and developers alike.

Volume 3

3.1.4.15 (Fermoy: new industrial site) – TII, making reference to DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), raises a concern with this proposed amendment taken in conjunction with proposed amendment 31.4.16 and recommends that the zoning objectives is omitted to protect the steady-state maintenance, operation, and safety of the National Roads network.

3.1.4.16 (Fermoy: new special policy area) - TII, making reference to DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and to requirements of the National Planning Framework, and RSES to maintain and protect the national road network, raises a concern with this proposed amendment taken in conjunction with proposed amendment 31.4.15. and recommends should be re-evaluated and accompanied by an appropriate evidence base as indicated in the DoECLG Spatial Planning and National Road Guidelines for Planning Authorities to demonstrate that proposals support and protect the steady-state maintenance and safety of the National Roads network.

3.1.5.28 (Mitchelstown: new industrial zoning) – submits that this zoning is at variance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. The proposed zoning would also not be in accordance with requirements of the National Planning Framework, and RSES to maintain and protect the national road network and recommends its omission.

3.2.3.23 (Mallow: change part of the existing residential/mixed residential and other uses zoning to existing mixed/general business/industrial uses.) – with reference to potential adverse impact on the N20 TII recommends that this zoning should be evaluated to take cognizance of its impact on the existing and future national road network in this area.

Volume 3, Other Issues: TII requests removal of Fermoy Objective FY-U-01

Volume 4

4.1.3.2 (amend lands to be zoned existing residential/mixed residential and other uses – Carrigaline),

4.1.3.10 (remove flood risk reference to Fernhill urban expansion area- Carrigaline),

4.1.3.20 (amend text to Fernhill urban expansion special policy area – Carrigaline )

4.1.3.26 (amend text to Fernhill urban expansion special policy area – Carrigaline)

In relation to these proposed amendments, TII highlights the national objective to maintain the strategic capacity and safety of the national roads network with reference to NPF, NDP, Draft NIFTI and Spatial Planning and National Roads Guidelines for Planning Authorities, and also raises concern regarding impact on the proposed M28 road scheme.

TII notes the recommendation with regards to the preparation of a Framework Masterplan but raises a concern regarding absence of details of the statutory basis for this and regarding statements made in Section 1.3.104 which may create a potential for an inappropriate ad-hoc approach to be prescribed to this area over the lifetime of the Plan. Submits that where such masterplans are proposed to be used to inform development management decisions, particularly in relation to areas with the potential to impact the transport network, planning authorities should undertake public consultation and incorporate them in the development plan or local area plan.

Primary concerns relate to the absence of appropriate plan-led evidence-based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for the existing and future national roads network. Submits that, unlike the NTA, TII has not been consulted in the preparation of a transportation plan for Carrigaline.

TII recommends that the proposed amendments, including the proposed Framework Masterplan, are clarified and addressed to address statutory status, consultation, liaison, and evidence base requirements as required by official policy provisions related to national roads. TII also again requests consultation on the preparation of transportation plan for Carrigaline.

4.1.3.24 (extend development boundary of Carrigaline and boundary of CL-R-12 and CL-R-13) – in the context of seeking the protection of the national road network and its junctions, with respect to the future M28 Cork to Ringaskiddy Project Motorway Scheme, as part of the EU Core TEN-T network, and of the NPF NSO of High-Quality International Connectivity, TII cautions that development objectives must not compromise the route selection process, stating that it is contiguous with lands the subject of the M28 scheme. It makes reference to Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines with regard to identifying land required for future national road projects and implementing measures so that development of sensitive uses are compatible with the

	<p>construction and long- term operation of the road.</p> <p>It submits that the amendment is premature pending the planning authority demonstrating that the proposed zoning can proceed complementary to safeguarding the future M28 motorway scheme.</p> <p>4.2.3.40 (Carrigtwohill: deletion of objective CT-R-15 and zoning of the site as CT-B-08 business) – with reference to national objective to maintain the strategic capacity and safety of the national roads network states that TII is not aware of any analysis undertaken by the Council to develop an evidence base to establish potential implications for the road network in the area and to support the proposed zoning at this location, submitting that, in the absence of this, the zoning is premature.</p> <p>Advises that the mitigation measures and costs identified and associated with providing or upgrading of public infrastructure elements in the amendment, including national roads improvements, be included in the Cork County Council's General Development Contribution Scheme.</p> <p>4.4.3.20 (Macroom: provision of a service station along the N22) – references section 2.5 of the Spatial Planning and National Roads Guidelines for Planning Authorities that in situations where lands adjoining National Roads to which speed limits greater than 60 kph apply, the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kph apply. Also makes reference to section 2.8 of same regarding motorway and roadside service areas/facilities. Considers that the provision of on online service area in the manner implied in Amendment no 4.4.3.20 would be at variance to these. Also references the national objective to maintain the strategic capacity and safety of the national roads network. Advises that the that the approach outlined the amendment should be altered to ensure that requirements of Sections 2.5 and 2.8 of the Spatial Planning and National Roads Guidelines for planning authorities to ensure national policy requirements on access to national roads and roadside service facilities at non-motorway national roads and junctions are complied with.</p> <p>4.4.6.5 (Killumney Ovens: new business and employment zoning) – Submits that amendment would adversely impact on the capacity, efficiency, and safety of existing N22 and associated junction and undermine the Government investment made on the N22 and that the proposed zoning would be at variance with Sections 2.5 and 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. Submits that the zoning would also not be in accordance with requirements of the National Planning Framework, RSES and CMATS to maintain and protect the national road network. Recommends that proposed amendment be omitted.</p> <p>This is set in the context of the following:</p> <ul style="list-style-type: none"> <li>• NPF National Strategic Outcome no 2 Enhanced Regional Accessibility,</li> <li>• the national road network being a critical enabler in facilitating an island wide sustainable national transport system,</li> <li>• the NDP investment priority to ensure that transport networks are maintained to a high level,</li> <li>• RSES RPO 140 regarding international connectivity</li> <li>• RSES RPO 166 Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors</li> <li>• RSES Section 6.3.6.3 'Transport Priorities for the Cork Metropolitan Area'</li> <li>• DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities</li> </ul> <p>Volume 5</p>
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	<p>5.1.4.18 (Bandon: updated text where spatial planning &amp; national roads guidelines apply) – submits that it appears that the material amendments do not seek to develop a plan led approach as required by Spatial Planning and National Road Guidelines for Planning Authorities. Based on the text associated with these amendments and the ^ symbol, it is unclear how this evaluation is to be undertaken. Submits that it would have been expected that the sustainable development approach to these sites would have been developed through the preparation of a local transport plan or through the current development plan process. TII advises that a plan led approach needs to be undertaken for this site and requests clarification on the approach to be taken in the instances of this amendment.</p> <p>The submission concludes by advocating a consultative approach to integrated land use and transportation planning to promote sustainable development stating that TII would welcome an opportunity to meet with the executive to further discuss the issues raised.</p>
<p><b>Chief Executive's Response</b></p>	<p>Volume One Comments in relation to Proposed Amendment 1.2.20. are noted. See also response to submission PADP401372742 in Volume Two, part 1, Ch 2 of this Report.</p> <p>The submission requests an amendment of Proposed Amendment 1.12.53 to reflect that DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities are Section 28 Guidelines. As these guidelines are already listed in Table 1 of Appendix A of the Draft Plan (implementation of the Ministerial Guidelines in the Cork County Development Plan 2022-2028) under Section 28 Guidelines it is not considered necessary to repeat this in the Proposed Amendment text.</p> <p>Proposed Amendment 1.5.8: The planning authority notes the request to indicate the National Road network on the Rural Housing Policy Area Types Map. It is not considered feasible to do this, as the scale of map is not conducive to showing this information clearly. It is noted however, that the base mapping options in the Development Plan Map Browser, already show the national road network. Accordingly, no change is proposed.</p> <p>Proposed Amendment 1.6.9: A minor modification is proposed to include additional wording 'subject to public and road safety concerns.</p> <p>Proposed Amendment 1.8.4: The project has yet to be scoped so further details are not yet available. The points raised are noted and will be considered as part of the project scoping and brief.</p> <p>Proposed Amendment 1.8.18: the points raised are noted. Such changes to Chapter 8 would be material in nature at this stage of the process. However, all relevant transport objectives in Chapter 12 apply to all types of development across the county and do not need to be restated. The provision of the DoECLG Spatial Planning and National Roads Guidelines will be implemented at project level.</p> <p>In relation to Proposed Amendments 1.9.16 and 1.9.20 please See Response to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>In relation to Proposed Amendment 1.10.17 the points raised are noted. To consider changes to Chapter 10 would be material in nature. However, all relevant transport objectives in Chapter 12 apply to all types of development across the county and do not need to be restated. The provision of the DoECLG Spatial Planning and National Roads Guidelines will be implemented at project level.</p> <p>The submission raises an issue regarding potential route corridors. As this is not subject of a Proposed Amendment it cannot be considered at this stage. Note however that the</p>

Planning Authority considers it to be appropriate that the Council will protect proposed national road route corridors where the route selection process has been completed/approved and where preferred route corridors have been identified. In practice, this means that in the case of the N/M20 the preferred option which is due to be announced in April will be protected rather than the six routes that are currently included in the selection process.

The submission requests clarification regarding the evidence base for sites denoted by ^, requiring RSA and TIA. This however does not relate to a Proposed Amendment and cannot be considered at this stage. The ^ symbol is used in the Draft Plan (and was used in the 2017 Local Area Plans) to indicate a requirement to carry out a Road Safety Audit and a Traffic Impact Assessment. The Planning Authority does not propose to change this approach in the Plan. This issue is also raised separately in the submission in relation to Proposed Amendment 5.14.18 – see below.

#### Volume 3

Proposed Amendment 3.1.4.15: See Response to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report. See also Section 3.1 of Volume One, Part 1 of this Report for Fermoy MD Key issues.

Proposed Amendment 3.1.4.16: See Response to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report. See also Section 3.1 of Volume One, Part 1 of this Report for Fermoy MD Key issues.

Proposed Amendment 3.1.5.28: See Response to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report. See also Section 3.1 of Volume One, Part 1 of this Report for Fermoy MD Key issues.

Fermoy U-01: the submission does not support objective FY-U-01 for a proposed slip road off the M8. The Elected Members have consistently requested that the proposed slip road is retained in the County Development Plan. No change proposed.

In relation to Proposed Amendments 3.2.3.23: See response to PADP400147309 in Volume Two, Part 2, Kanturk Mallow MD of this Report. As well as considering the impact of flood risk on this site any proposals at this location will need to consider other project level impacts including the potential for intensification of use of the access and its potential for adverse impacts on the existing N20.

#### Volume 4

The submission raised issues in relation to Carrigaline and Proposed Amendments 4.1.3.2, 4.3.1.10, 4.1.3.20, 4.3.1.26, and 4.1.3.24. Carrigaline is the largest town in the County and has experienced significant population and housing growth over a long period of time. Also, there is a lack of sufficient employment land within the town which influences the high car dependency. IDA have indicated that there is a requirement to identify additional employment lands in the area. The proposal to develop the Fernhill Urban Expansion Special Policy Area is a prudent and strategic response to these strategic issues ensuring that future housing and employment land supply is properly planned for over the lifetime of the Plan. The objective of the Special Policy Area is to prepare a Framework Masterplan which will decide the allocation of uses within the area. However, the main uses under consideration will be Recreational and Amenity Areas, Residential/Residential Reserve, Business and High Technology Campus areas. The overall mix of uses and their extent, and location will be decided in the preparation of the Framework Masterplan which will aim to achieve a balance between the various uses identified. A detailed landscaping scheme is to form part of the Framework Masterplan to identify an area

	<p>within the Fernhill Urban Expansion Special Policy Area to make provision for a distinctive separation between the settlements of Carrigaline and Ringaskiddy.</p> <p>The proposal has been fully assessed as part of the preparation of the Carrigaline Transport and Public Realm Strategy (TPREP) to ensure that it has strong sustainable walking and cycling links with the town and the town centre to encourage modal shift away from cars.</p> <p>Development of these lands will be subject to the opening of the M28 and the preparation of a Framework Plan which will address the issues raised and will be subject to a Variation to the County Development Plan 2022.</p> <p>The Local Authority consider the identification of these lands for more detailed planning over the lifetime of the Plan is a prudent proper planning approach to help guide the future development of Carrigaline in a sustainable manner and in consultation with key stakeholders including NTA and TII.</p> <p>In relation to Proposed Amendment 4.1.3.24 the Planning Authority does not feel that the extension of the development boundary of Carrigaline to reach the southern line of the CPO which involves an extension to the CL-R-12 and CL-R-13 zonings will compromise the M28 route selection process. The lands are contiguous and not overlapping the lands that are the subject of the M28 scheme. Proposed Amendment 4.1.3.28 includes provision in objectives CL-R-12 and CL-R-13 that the layout should also include the provision of appropriate boundary treatment and landscaping buffer of native tree species along the northern boundary of the site to protect residential amenities of adjoining property and maintain visual separation from the M28. TII will be consulted with as part of Development Management procedures in relation to the delivery of these objectives.</p> <p>Proposed Amendment 4.2.3.40 - the proposal to zone a 5Ha site to the east of Carrigtwohill for business use is considered appropriate due to its alignment with the integrated land use and transport planning approach of the plan, where the provision of residential development and employment opportunities in Carrigtwohill will allow for a reduction of the need to travel and will support the 10-minute town concept. Given the population and housing growth targets identified for the town it is important that sufficient employment land is available to allow people to choose to both live and work in the town. The Planning Authority has committed to carrying out a Business Land Availability Study which will inform the need for any future changes to employment land provision.</p> <p>In relation to Proposed Amendment 4.4.3.20, Macroom, a minor modification is proposed to make reference to Sections 2.5 and 2.8 of the Spatial Planning and National Roads Guidelines for planning authorities as requested in the submission.</p> <p>In relation to Proposed Amendment 4.4.6.5 (Killumney Ovens: new business and employment zoning), it is recommended that the Proposed Amendment be retained.</p> <p>Volume 5</p> <p>In relation to Proposed Amendment 5.1.4.18, Bandon, the issue raised by the TII seems to relate to the general use of the ^ symbol which is used in the Draft Plan (and which was used in the 2017 Local Area Plans) to indicate a requirement to carry out a Road Safety Audit and a Traffic Impact Assessment. This was also raised elsewhere in the submission but not in the context of any Proposed Amendment (see above). The Planning Authority does not propose to change this approach in the Draft Plan generally or in relation to this Proposed Amendment.</p>
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 1.12.53 with No Modification.

	<p>Adopt Proposed Amendment 1.5.8 with No Modification.</p> <p>Adopt Proposed Amendment 1.8.4 with No Modification.</p> <p>Adopt Proposed Amendment 1.8.18 with No Modification.</p> <p>Adopt Proposed Amendment 1.10.17 with No Modification.</p> <p>Adopt Proposed Amendment 3.2.3.23 with no Modification.</p> <p>Adopt Proposed Amendment 4.4.6.5 with No Modification.</p> <p>Adopt Proposed Amendment 4.1.3.24 with No Modification.</p> <p>Adopt Proposed Amendment 5.1.4.18 with no Modification.</p> <p>Proposed Amendment 1.2.20: See also Recommendation to submission PADP401372742 in Volume Two, Part 1, Ch 2 of this Report.</p> <p>Proposed Amendment 1.9.20: See Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment 1.9.16: See Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment 3.1.4.15: See Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment 3.1.4.16: See Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment 3.1.5.28: See Recommendation to OPR Submission in Key Issues Section 2.2 of Volume One, Part 1 of this Report.</p> <p>Proposed Amendment 3.2.3.23: See recommendation to submission PADP400147309 in Volume Two, Part 2, Kanturk Mallow MD in this Report.</p> <p>Proposed Amendment 4.1.3.2: See recommendation to submission PADP401365134 in Volume Two, Part 2, Carrigaline MD in this Report.</p> <p>Proposed Amendment 4.1.3.10: See recommendation to submission PADP401227539 in Volume Two, Part 2, Carrigaline MD in this Report.</p> <p>Proposed Amendment 4.1.3.20: See recommendation to submission PADP401227539 in Volume Two, Part 2, Carrigaline MD in this Report.</p> <p>Proposed Amendment 4.1.3.26: See recommendation to submission PADP401227539 in Volume Two, Part 2, Carrigaline MD in this Report.</p> <p>Adopt Proposed Amendment 1.6.9 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p> <p>Adopt Proposed Amendment 4.4.3.20 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p> <p>No further action required in relation to FY-U-01, Fermoy.</p>
<b>Interested Party</b>	<b>UCC - Commuter Plan</b>

<b>Ref. No.</b>	PADP401450506
<b>Proposed Amendment No.</b>	Various – see summary for details.
<b>Submission Summary</b>	<p>Submission states that UCC is fully committed to a sustainable Green Campus policy and that a major element is the promotion of sustainable travel for staff and students to and from the UCC Campus. States that they are pleased to see that sustainable travel, and especially the conditions for active travel, plays an important role in the County Development Plan 2022-2028 and that this will also have positive effects on more sustainable commutes to UCC.</p> <p>Notes that many items raised in their submission to the Draft CDP in relation to Transport in July 2021 have resulted in proposed amendments. States support for the following proposed amendments in Chapter 12 (Transport) that it submits are of direct relevance to sustainable commuting to UCC:</p> <p>1.12.19 - States that this will help to ensure the development of high quality public transport corridors, leading to a spatial structure that better promotes the use of sustainable modes.</p> <p>1.12.39 - Welcomes the stronger support for the role of Cork Airport as international connectivity is vital for a world-wide connected university.</p> <p>1.12.41 - States that cycling is as a sustainable mode with a high potential for modal shift and that adequate (residential) parking facilities for bikes are an important part of cycling infrastructure.</p> <p>1.12.48 - Submits that the Cork Harbour Greenway, as part of the Lee to Sea Greenway, is as an important element of active travel infrastructure, connecting specific residential areas and UCC’s Beaufort laboratory, to the City and UCC Campus and that they support a timely delivery of the Lee to Sea greenway.</p> <p>1.12.50 - Strongly welcomes support for the ‘Safe Routes to School’ programme believing that safe active travel access routes to schools will lead to a higher proportion of students travelling independently to schools, uncoupling the school run from the parents’ commute, giving them more options for the use of sustainable travel modes. Further submits that the experience of non-car dependent school travel at school age is likely to support the use of sustainable travel modes once the students enter third-level education.</p> <p>1.12.54, 1.12.55, 1.12.40 - states that they welcome the expansion of section 12.14 regarding the support for emerging innovations in the transport and mobility sector, as new forms of mobility will promote higher uptake of sustainable travel modes, seeing themselves as a unique driver of innovation.</p> <p>1.12.58 - welcomes promotion of multi modal travel here through the better integration of active travel and train journeys.</p> <p>1.12.8, 1.12.25, 1.12.63 - states that it strongly welcomes the inclusion of people of all ages and abilities in transport and mobility.</p>
<b>Chief Executive's Response</b>	The support for the above-mentioned Proposed Amendments is noted.
<b>Chief Executive's Recommendation</b>	<p>Adopt the following Proposed Amendments with No Modification: 1.12.8, 1.12.19, 1.12.25, 1.12.39, 1.12.40, 1.12.41, 1.12.48, 1.12.50, 1.12.54, 1.12.55, 1.12.63.</p> <p>Adopt Proposed Amendment 1.12.58 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p>
<b>Interested Party</b>	<b>University College Cork</b>
<b>Ref. No.</b>	PADP401553373
<b>Proposed Amendment No.</b>	Various – see summary for details.

<p><b>Submission Summary</b></p>	<p>Submission states that UCC is fully committed to a sustainable Green Campus policy and that a major element is the promotion of sustainable travel for staff and students to and from the UCC Campus. States that they are pleased to see that sustainable travel, and especially the conditions for active travel, plays an important role in the County Development Plan 2022-2028 and that this will also have positive effects on more sustainable commutes to UCC.</p> <p>Notes that many items raised in their submission to the Draft CDP in relation to Transport in July 2021 have resulted in proposed amendments. States support for the following proposed amendments in Chapter 12 (Transport) that it submits are of direct relevance to sustainable commuting to UCC:</p> <p>1.12.19 - States that this will help to ensure the development of high quality public transport corridors, leading to a spatial structure that better promotes the use of sustainable modes.</p> <p>1.12.39 - Welcomes the stronger support for the role of Cork Airport as international connectivity is vital for a world-wide connected university.</p> <p>1.12.41 - States that cycling is as a sustainable mode with a high potential for modal shift and that adequate (residential) parking facilities for bikes are an important part of cycling infrastructure.</p> <p>1.12.48 - Submits that the Cork Harbour Greenway, as part of the Lee to Sea Greenway, is as an important element of active travel infrastructure, connecting specific residential areas and UCC’s Beaufort laboratory, to the City and UCC Campus and that they support a timely delivery of the Lee to Sea greenway.</p> <p>1.12.50 - Strongly welcomes support for the ‘Safe Routes to School’ programme believing that safe active travel access routes to schools will lead to a higher proportion of students travelling independently to schools, uncoupling the school run from the parents’ commute, giving them more options for the use of sustainable travel modes. Further submits that the experience of non-car dependent school travel at school age is likely to support the use of sustainable travel modes once the students enter third-level education.</p> <p>1.12.54, 1.12.55, 1.12.40 - states that they welcome the expansion of section 12.14 regarding the support for emerging innovations in the transport and mobility sector, as new forms of mobility will promote higher uptake of sustainable travel modes, seeing themselves as a unique driver of innovation.</p> <p>1.12.58 - welcomes promotion of multi modal travel here through the better integration of active travel and train journeys.</p> <p>1.12.8, 1.12.25, 1.12.63 - states that it strongly welcomes the inclusion of people of all ages and abilities in transport and mobility.</p>
<p><b>Chief Executive's Response</b></p>	<p>The support for the above-mentioned Proposed Amendments is noted.</p>
<p><b>Chief Executive's Recommendation</b></p>	<p>Adopt the following Proposed Amendments with No Modification: 1.12.8, 1.12.19, 1.12.25, 1.12.39, 1.12.40, 1.12.41, 1.12.48, 1.12.50, 1.12.54, 1.12.55, 1.12.63.</p> <p>Adopt Proposed Amendment 1.12.58 with Minor Modification. See Section 1.2 of Volume One, Part 2 of this Report for details of the Modification.</p>

## 13 Chapter 13 Energy and Telecommunications

<b>Interested Party</b>	<b>Electricity Supply Board</b>
<b>Ref. No.</b>	PADP401372492
<b>Proposed Amendment No.</b>	1.13.1, 1.13.2, 1.13.3, 1.13.11, 1.13.30, 1.13.32, 1.12.10, 1.12.35
<b>Submission Summary</b>	<p>The submission welcomes the further emphasis being delivered through the proposed amendments and alignment with the recently published Climate Action and Low Carbon Development (Amendment) Act 2021. Submission gives details on the Climate Action Plan 2021, recent energy consumption trends and the Governments updated renewable energy targets set out for the country. Submission welcomes the Proposed Amendments, No. 1.17.2 and No. 1.7.10 that highlight the cross-cutting updates required to reflect legislative changes since publication of the Draft Plan.</p> <p>Submission notes that, in support of the transition of the National Grid to a low-carbon future, the ESB is developing assets such as battery storage and flexible gas fired units that respond quickly to system demand, which will be key to facilitating large scale renewables in the future and therefore wishes to make the following comments on the proposed amendments below.</p> <p>The submission welcomes the following amendments:</p> <ul style="list-style-type: none"> <li>• Proposed Amendment 1.13.1- Renewable Energy Strategy.</li> <li>• Proposed Amendment No. 1.13.2 – Repowering Existing Infrastructure.</li> <li>• Proposed Amendment No. 1.13.3 – Hybrid Energy.</li> <li>• Proposed Amendment No. 1.13.11 – Land Based Infrastructure.</li> <li>• Proposed Amendment No. 1.13.30 – Hydro Power.</li> <li>• Proposed Amendment No. 1.13.32 – Hydrogen.</li> <li>• Proposed Amendment No’s. 1.12.10 &amp; 1.12.35 – EV Charging Provision.</li> </ul> <p>Submission gives details on the most up to date status of Electric vehicles on the Irish roads. It notes since the Draft Plan was published last year, there has been a change in standards required for EV charging infrastructure. Submission highlights the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure and sets out standards for various developments. Submission suggests in the preparation final CDP, an opportunity exists to ensure availability is expanded, in line with the new directive so that the County is consistent with National and Regional Policy. The Submission requests the following to be updated in the final draft of the CDP:</p> <ul style="list-style-type: none"> <li>• Requests that the standards as set out in Statutory Instrument No. 393/2021 European Union (Energy Performance of Buildings) Regulations 2021 are fully implemented to ensure that the Cork County Development Plan increases capacity for the usage of electric vehicles to the levels required.</li> <li>• To further amend TM 12.11 and also update Table 12.6 Car Parking Requirements for New Developments in the final plan.</li> </ul>
<b>Chief Executive's Response</b>	<p>The submission supports the change set out in Proposed Amendments: 1.17.2, 1.7.10, 1.13.1, 1.13.2, 1.13.3, 1.13.11, 1.13.30, 1.13.32, 1.12.10, 1.12.35.</p> <p>The submission seeks a further amendment to objective TM 12.11 in relation to EV charging provision. As this is not a minor modification it cannot be considered at this stage. However, TM 12.11 a) requires that infrastructure for Electric Vehicles will be integrated into developments in line with national requirements. This</p>

	<p>ensures that at all times over the lifetime of the Plan the requirements of this evolving national policy will apply.</p> <p>In relation to Parking Standards, a cross reference to TM 12.1 can be added to Table 12.6 Parking Standards as a non-material change.</p>
<b>Chief Executive's Recommendation</b>	<p>Adopt Proposed Amendments 1.17.2 with no modification.</p> <p>Adopt Proposed Amendments 1.7.10 with no modification.</p> <p>Adopt Proposed Amendments 1.13.1 with no modification.</p> <p>Adopt Proposed Amendments 1.13.2 with no modification.</p> <p>Adopt Proposed Amendments 1.13.3 with no modification.</p> <p>Adopt Proposed Amendments 1.13.11 with no modification.</p> <p>Adopt Proposed Amendments 1.13.30 with no modification.</p> <p>Adopt Proposed Amendments 1.13.32 with no modification.</p> <p>Adopt Proposed Amendments 1.12.10 with no modification.</p> <p>Adopt Proposed Amendments 1.12.35 with no modification.</p> <p>Make a non-material change to Proposed Amendment TM12.1.</p>
<b>Interested Party</b>	<b>FuturEnergy Ireland</b>
<b>Ref. No.</b>	PADP401382023
<b>Proposed Amendment No.</b>	1.13.1 and 1.13.16
<b>Submission Summary</b>	<p>The submission is from FuturEnergy Ireland (FEI), a new joint venture company owned on a 50:50 basis by Coillte and ESB. Submission notes FEI is one of the largest dedicated developers of onshore wind in Ireland and the mission of FEI is to maximise the potential of Ireland's national resources and accelerate Ireland's transformation to a low carbon energy economy. The key points of this submission are as follows:</p> <ul style="list-style-type: none"> <li>• With regard to proposed amendment 1.13.1 and the proposed additional text in Objective ET13.1. which states that ' during the life of this plan the Council will prepare a renewable energy strategy' , the submission requests a tighter timeline for the preparation and adoption of a strategy given the climate emergency and long lead-in times for energy projects. Submission also wants the strategy to include an update of the Wind Energy Strategy. Submission requests that the amendment be revised to read as follows: 'During the first 18 months of the plan, the Planning Authority will prepare and adopt a renewable energy strategy for the county, incorporating an update of the Wind Energy Strategy'.</li> <li>• With regard to amendment No. 1.13.16 which proposes to amend Objective ET13.5 Wind Energy Projects to include text indicating that wind energy projects should generally avoid 'sites and locations of ecological sensitivity' submission notes that these areas are not mapped or defined in the plan and inclusion of this text will therefore add a new and confusing constraint to the adopted wind energy strategy designations. It is argued that the consequential impact of this change on onshore wind generation has not been considered or assessed. Submission requests amendment No. 1.13.16 is deleted and the appropriateness of same considered holistically during the upcoming renewable energy strategy</li> </ul>



	<p>preparation.</p> <ul style="list-style-type: none"> <li>• Submission requests that existing operating wind farm sites, and areas proximate to same, should be considered favourably under the new Plan and in the new RES, where such development comprises infill wind farm development and/or maximises the efficiency of pre-existing infrastructure and subject to the other standard development management principles.</li> <li>• Submission supports a regional approach to renewable energy strategies and the spatial planning of renewable energy developments to compliment the Local Authority-level approach. Submission strongly suggests any review of the current wind energy strategy removes wind speeds and grid infrastructure constraints and actively seeks opportunities to facilitate wind in new areas in the County including infill sites, in accordance with the principles of proper planning and sustainable development.</li> </ul> <p>Submission concludes, Cork has always been a leader and exemplar in facilitating renewable energy and onshore wind and believes the requests above will ensure this continues.</p>
<b>Chief Executive's Response</b>	<ol style="list-style-type: none"> <li>1. This submission requests a change to Proposed Amendment 1.13.1. The Local Authority is fully committed to preparing Renewable Energy Strategy. There are additional factors determining the timeframe for completion of a RES. The RES will need to be prepared in parallel with a landscape strategy and the adoption of the wind energy guidelines along with the release of proposed solar guidelines will help commit to the adoption of a renewable energy strategy in a timely manner. It is not feasible to commit to preparing and adopting a renewable energy strategy within 18 months.</li> <li>2. This submission requests a change to Proposed Amendment 1.13.16 to request an amendment to objective ET 13.5 Wind Energy projects to omit the text saying, 'wind energy projects should generally avoid sites and locations of ecological sensitivity'. The Local Authority acknowledges that sites of ecological sensitivity are not mapped. Equally the Local Authority acknowledges that it is not possible for the sieve mapping to pick up everything. It is considered most appropriate to consider these issues at project stage when full information is available showing scale and nature of the project. In this instance the proposed amendment is considered reasonable.</li> <li>3. The other issues raised in this submission do not relate to any proposed amendment and therefore while the issues raised are noted, they cannot be considered further at this stage. These issues will be considered further as part of the preparation of the Renewable Energy Strategy.</li> </ol>
<b>Chief Executive's Recommendation</b>	<ol style="list-style-type: none"> <li>1. Adopt Proposed Amendment 1.13.1 with No Modification.</li> <li>2. Adopt Proposed Amendment 1.13.16 with No Modification.</li> <li>3. No Further Action Required.</li> </ol>
<b>Interested Party</b>	<b>Sophie Brazil</b>
<b>Ref. No.</b>	PADP401440035
<b>Proposed Amendment No.</b>	1.13.29 and 1.13.35
<b>Submission Summary</b>	The submission relates to the Energy and Telecommunications chapter in the Draft County Development Plan. It notes to avoid the most severe impacts of climate change, global temperatures must be kept below 1.5C above pre-industrialised

	<p>levels, and we will need rapid and deep action to decarbonise our energy systems. It highlights that burning fossil fuels is the biggest cause of climate change and City and County council's play a hugely important role in helping communities to transition from fossil fuels to renewable energy. Submission makes the following recommendation to the plan:</p> <ol style="list-style-type: none"> <li>1. Requests that the CDP should not allow for the expansion of the gas grid in objective ET13.24 (amendment 1.13.29) and that the expansion of the grid is not sustainable. It states the CDP should ban fracked gas in its energy mix and any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment in line with the Paris agreement. Submission includes details on the impacts of fossil gas projects, Energy Security and LNG.</li> <li>2. Requests that new data centres must be powered entirely by onsite or new off-site renewable energy and existing centres must rapidly transition to onsite or new offsite renewables. It requests where technically possible, heat generated from a data centre should be utilised for district heating systems. Submission welcomes objective ET13.29 Data Centres, however rather than just "promoting co-location" the submission is seeking for the Council to follow the Danish example to legally bind data centre owners and developers to contribute to the infrastructure required to supply the centres with renewable energy. Submission argues it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.</li> <li>3. Outside of the development plan, the submission makes several requests in relation to public participation and people-led policy with the following: <ul style="list-style-type: none"> <li>- the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.</li> <li>- The Climate Action and Environment office, or equivalent, within the council must be adequately resourced, publicised and staffed.</li> <li>- Participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part.</li> <li>- Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes.</li> <li>- Support and establish community energy projects throughout the lifetime of the county development plan.</li> </ul> </li> </ol> <p>Submission states that throughout the lifetime of this county development plan, Ireland's transition to a low carbon society is entering its most crucial decade. It's vital that it should be centred around providing people and communities with clean, affordable and reliable energy. The best way to do so is to ensure citizen participation at all levels and stages of the energy transition. Submission includes details of how community participation and ownership has proved important for public acceptance of the energy transition and includes examples of how it is more advanced in other countries in Europe.</p>
<p><b>Chief Executive's Response</b></p>	<ol style="list-style-type: none"> <li>1. Paragraph 13.17.7 in draft plan acknowledges the need to reduce reliance on fossil fuels. See also section 13.17 regarding the use of gas infrastructure. The issue highlighted in this submission are noted but would be material changes and are beyond the scope of what is feasible at this stage of the review process and are a matter for national policy.</li> <li>2. The Local Authority is mindful of the urgency to transition to renewable energy, notes the NPF and RSES acknowledges the important role of data centres and support the development of these facilities in the country. The issues highlighted in</li> </ol>

	<p>this submission are noted but are beyond the scope of the amendments and the County Development Plan. This issue is a matter for national policy.</p> <p>3. Chapter 6 of the plan supports community engagement regarding same to recognise the diversity of needs of all citizens of various life stages, cultural and ethnic minorities, and ensure all have the opportunity to contribute to the development of their communities. See also objective SC6-2 Social and Community Engagement. The Planning Authority will continue to actively engage with all citizens in order to encourage involvement in their community, so people have a voice in the decisions that affect their quality of life in their county, where appropriate. See also paragraph 6.1.5 and reference to the Cork County Public Participation Network.</p>
<p><b>Chief Executive's Recommendation</b></p>	<ol style="list-style-type: none"> <li>1. No further action required.</li> <li>2. No further action required.</li> <li>3. No further action required.</li> </ol>

## 14 Chapter 14 Green Infrastructure

<b>Table 1.14</b>	<b>Chapter 14 Green Infrastructure</b>
<b>Interested Party</b>	<b>Cork Environmental Forum</b>
<b>Ref. No.</b>	PADP401450223
<b>Proposed Amendment No.</b>	Multiple amendments
<b>Submission Summary</b>	This submission lists the proposed amendments across the plan that are supported by the Cork Environmental Forum under various headings including: Environmental Limits, Light Pollution and Protecting our Dark Sky Assets, Blue and Green Infrastructure and ecosystems, Nature Based Solutions, Landscape, Re-use of Buildings, Glenbeg Lough/ Glanmore Bog SAC, SEA monitoring, Local Transport Plans and Permeability, Sustainable and Resilient Places, Development within the Coastal Zone.
<b>Chief Executive's Response</b>	Support for the proposed amendments as outlined in the submission is noted.
<b>Chief Executive's Recommendation</b>	Adopt proposed amendments and/or minor modifications where applicable.

## 15 Chapter 15 Biodiversity and Environment

<b>Interested Party</b>	<b>Dept of Housing, Local Government &amp; Heritage (Prescribed Body)</b>
<b>Ref. No.</b>	PADP401363305
<b>Proposed Amendment No.</b>	Various
<b>Submission Summary</b>	<p>The Screening assessment has been thorough and SEA monitoring of the plan is welcomed however consideration of the following is requested:</p> <ul style="list-style-type: none"> <li>• Glenbeg Lough- No further abstraction from Glanmore Bog SAC should be reflected in the relevant development objectives.</li> <li>• R624 Upgrade: Clarify that the footnote in 1.12.45 will be taken into account as a modification to the wording of the objective TM12-12.</li> <li>• Clarify whether Fermoy WWTP is listed in the Irish Water Investment Plan 2020-2024 as per pg.80 of the main text</li> <li>• Recommend inclusion of the word ‘sustainably’ regarding Malin Head to Kinsale path</li> <li>• Clarification required regarding invasive species amendment. The NPWS is not the sole authority responsible for enforcement of Regulation 49 offences in relation to listed invasive species.</li> </ul> <p>Zoning Amendments are also requested to be considered:</p> <ul style="list-style-type: none"> <li>• Kanturk (3.2.5.5) include a clause for a riparian buffer, stormwater discharge points and SuDS to avoid adverse effects on the SAC.</li> <li>• Mallow (3.2.3.12) For SEA and NIR, check if SuDS or WWTP infrastructure upgrade is required and can be achieved before the development is operational.</li> <li>• Passage West (4.1.4.11) cumulative impacts of developing old estate-type areas with mature deciduous woodland in both Cork City and the County environs of the city should be considered. Needs to be assessed by SEA and suggests inclusion of a specific clause on ecological impact assessment and ensuring minimal biodiversity impacts.</li> <li>• Middleton (4.3.3.17) AA needs to consider the reasons why the field adjoining the estuarine SAC can be included in the zoning.</li> <li>• Bandon (5.1.4.27) contains ancient and residual alluvial woodland so consider narrowing the zoning, excluding the northern part of the zone.</li> <li>• Bandon (5.1.4.28) welcomes mention of full ecological assessment given overmature trees of high biodiversity value could otherwise be classed as dangerous.</li> </ul>
<b>Chief Executive's Response</b>	<ul style="list-style-type: none"> <li>• Water abstraction is addressed in Volume 1, Chapter 11 particularly through reference to the Water Framework Directive. Objective WM 11-1 seeks to protect and improve the County’s water resources and ensure that development permitted does not contravene the objectives of the EU Water Framework Directive. Proposed Amendment no. 1.11.11 also includes additional text in relation to Glenbeg Lough/ Glanmore Bog SAC clarifying AA sensitivities relating to water abstraction from Glenbeg Lough. Proposed Amendment no. 1.11.11 was considered sufficient in the corresponding AA screening report. In addition, Table 5.2.2 in Proposed Amendment 5.2.2.1 makes clear that new development in Castletownbere requiring a connection to the public water supply cannot be permitted if it</li> </ul>

	<p>will result in an increase in abstraction rates from Glenbeg Lough. (This also applies to any other settlements in the Beara area relying on the Glenbeg Lough Water Supply). Overall, there are sufficient provisions in the Draft Plan to address the concerns regarding Glanmore Bog SAC and no further action is considered necessary.</p> <ul style="list-style-type: none"> <li>• The footnote in Amendment no. 1.12.45 has been drafted to be taken into account as part of Objective TM12-12. Adopt Proposed Amendment No. 1.12.45 with No Modification.</li> <li>• Fermoy Wastewater Treatment Plant- Irish Water, in their submission dated 11/02/22, have advised that Fermoy’s WWTP has capacity to cater for the growth proposed in the Draft County Development Plan. It is recommended that the text and table in Appendix D for Fermoy WWTP in Amendment 1.2.20 be updated to reflect the most recent data as a non-material amendment.</li> <li>• It is not considered necessary to repeat the term ‘sustainability’ for Malin Head path as this is addressed in Objective TO-10-1 and Objective TO-10-2. It is recommended to Adopt Proposed Amendment No. 1.10.8 with No Modification.</li> <li>• The text on invasive species in Proposed Amendment no. 1.15.26 should be updated to better reflect that the NPWS is not the sole authority tasked with invasive species enforcement. It is recommended that this be done as a Non-Material Change.</li> <li>• For Kanturk (3.2.5.5) Objective WM 11-10 requires any new development to incorporate sustainable drainage systems (SuDS) and Objective WM 11-11 River Channel Protection requires adequate protection measures along watercourses, keeping them free from development by ensuring development is kept 10m or other appropriate distance from stream and river banks in line with best practice for riparian corridors. Development altering the hydromorphology of a watercourse will not normally be permitted, where it may result in the deterioration in the status of a water body through for example, impacts on water quality, quantity or flow rate, riparian habitat or protected species. Overall, it is recommended to Adopt Proposed Amendment No. 3.2.5.5 with No Modification. The Dalua should be changed to the Allow River as a non-material change.</li> <li>• For Mallow Proposed Amendment No. 3.2.3.12, there are considered to be sufficient caveats in Volume One of the Plan to address concerns, including Objective WM-11-9 which advises that development in all settlements connect to public wastewater treatment facilities subject to sufficient capacity being available which does not interfere with Council’s ability to meet the requirements of the Water Framework Directive and the Habitats Directive. In settlements where no public wastewater system is either available or proposed, or where design, capacity or licensing issues have been identified in existing plants, new developments will be unable to proceed until adequate wastewater infrastructure is provided. In assessing proposals for development, it is a requirement that adequate assimilative capacity in the receiving waterbody be retained so as to allow for the overall growth of the settlement. Objective WM-11(1)G also requires that development may only proceed where appropriate wastewater treatment is available which meets the requirements of environmental legislation, the Water Framework Directive and the requirements of the Habitats Directive</li> <li>• For Passage West, the concerns raised in relation to the heritage and ecological impacts of Proposed Amendment No. 4.1.4.11 Rockenham House have been considered and it is recommended that the proposed amendment does not proceed. In particular, the subject site adjoins both the Great Island Channel SAC and Cork Harbour SPA and also support habitats which are likely to be used by qualifying interest species of the</li> </ul>
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	<p>SPA. Aerial imagery would indicate that high nature habitats occur within the site which include two waterbodies, which are described as brackish waters and significant tree cover from mature broadleaf woodland. The lagoon is likely to be utilised by a number of special conservation interest species for which the SPA is designated. This site supports habitats of high ecological value including woodland and wetlands. Numerous habitats are found on this site such as Brackish Water, Scrub Traditional Woodland, Semi-natural grassland, Highly Modified/Non and an Ecological Corridor. The site is currently located within part of the prominent and strategic metropolitan greenbelt – the visual and landscape impacts of residential development on the Greenbelt site would be of concern. Part of the site is located within flood zone and concern remains regarding including land within flood zone A which would only be appropriate for water compatible uses such as Green Infrastructure. Furthermore, Rockenham House is a protected structure on the Record of Protected Sites (00510) which includes the historic demesne including woodlands, which forms part of the curtilage of the protected structure. Rockenham House is also listed on the NIAH: 20975010 Regional Rating. The proposed rezoning would conflict with development management objectives as set out in Objective HE 16-11: Record of Protected Structures and Objective HE 16-12: Protection of Structures on the NIAH. The request to better consider the cumulative impacts of the development of demesne sites in Cork is also noted and an inventory of such sites will be added to the environmental baseline for future SEA's so that cumulative impacts can be better assessed in the future.</p> <ul style="list-style-type: none"> <li>• Midleton (4.3.3.17) - Having regard to the sufficiency of land zoned for residential development in the respective towns consistent with the Core Strategy (table under MA 1.2.13), and the approach to the zoning for residential lands under the Development Plans, Guidelines for Planning Authorities – Draft for Consultation (August, 2021), the planning authority is required to make the Plan without the Residential Reserve zoning objectives and associated objectives where relevant. It is therefore recommended to not to Adopt the Proposed Amendment 4.3.3.17 and revert to the Draft Plan as Agricultural zoning MD- AG-02.</li> <li>• Bandon (5.1.4.27) – It is considered that the proposed new green infrastructure conservation zoning BD-GC-09 is appropriate for the lands and it is recommended to Adopt Proposed Amendment 5.1.4.27 with No Modification.</li> </ul>
<p><b>Chief Executive's Recommendation</b></p>	<ul style="list-style-type: none"> <li>• Adopt Proposed Amendment No. 1.12.45 with no modification.</li> <li>• Update the text and table in Appendix D for Fermoy WWTP in Amendment 1.2.20 to reflect the most recent Irish Water data as a non-material amendment.</li> <li>• Adopt Proposed Amendment No. 1.10.8 with no modification.</li> <li>• Adopt Proposed Amendment 5.1.4.27 with no modification.</li> <li>• Adopt Proposed Amendment 3.2.5.5 with no modification.</li> <li>• Adopt Proposed Amendment No. 3.2.3.12 with no modification.</li> <li>• Change the Dalua River to the Allow River in Proposed Amendment no. 3.2.5.5 as a non-material amendment.</li> <li>• Amend text in Proposed Amendment no. 1.15.26 to better reflect that the NPWS is not the sole authority tasked with invasive species enforcement as a non-material amendment.</li> <li>• Not to Adopt the Proposed Amendment 4.1.4.11 and revert to the Draft Plan.</li> <li>• Not to Adopt the Proposed Amendment 4.3.3.17 and revert to the Draft Plan as MD- AG-02.</li> </ul>

	<ul style="list-style-type: none"><li>• Adopt Proposed Amendment 5.1.4.27 with no modification.</li></ul>
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## 16 Chapter 16 Built and Cultural Heritage

Table 1.16	Chapter 16 Built and Cultural Heritage
Interested Party	Conradh na Gaeilge
Ref. No.	PADP401234478
Proposed Amendment No.	N/A
Submission Summary	<p>This submission relates to Chapter 16 – Built and Cultural Heritage. It does not relate to any specific proposed amendments. The submission raises the following:</p> <ul style="list-style-type: none"> <li>• Cork County Council is failing to protect the Gaeltacht in terms of housing planning and this should be addressed as a matter of urgency;</li> <li>• Housing planning in the Gaeltacht should be focussed entirely on preservation and strengthening of the Gaeltacht Community and it should be assumed that the Irish speaker has a ‘local need’ to facilitate the planning process of people of the Gaeltacht.</li> <li>• The Guidelines of the Minister for Housing under S.28 of the Planning &amp; Development Act 2000 are not being implement by Cork County Council. Most of these policies highlight that there should be a good mix in the Gaeltacht community in terms of age and that the large increase in English speakers from outside should be restricted.</li> <li>• The commercial and cultural development of the Gaeltacht as a Gaeltacht is also recommended with an emphasis on language - based industries and emphasis is placed on the teaching of the language itself.</li> <li>• The references made to the Gaeltacht in the National Planning Framework and the emphasis placed there on the importance of the Gaeltacht, the Gaeltacht islands, and the importance of Gaeltacht Language Planning.</li> </ul> <p>While we are delighted that Cork County Council has recognized these aspirations in the Draft Development Plan, the County Council is not implementing a program of action to achieve these aspirations.</p> <ul style="list-style-type: none"> <li>• Reference is made to a High Court decision (Comharchumann Ráth Chairn v. An Bord Pleanála). In this case, it was determined that it had not been proved that the proposed housing and hotel development would be in the interests of the Irish language.</li> <li>• Housing Estates: It is recommended proficiency at TEG B2 level or above in spoken Irish as an acceptable standard for people coming to the area from outside. It must be proved that the estate would make a significant contribution to the promotion of Irish as the main language of the community and to this end, a language clause must be implemented so that 90% of houses in housing estates in Gaeltacht areas in categories A and B and 35% of houses in Gaeltacht areas in category C have an Irish language requirement.</li> <li>• Holiday Homes: We recommend that no more than 10% of the houses in any one electoral division are holiday homes.</li> <li>• Social Housing: That those entitled to social housing have the right to be provided with such housing in their own community - rather than being driven into the surrounding towns.</li> </ul> <p>There should be a social housing scheme for one-off houses for the Gaeltacht community on their own land or that of their families.</p> <p>The County Council should have a strategy to purchase houses / land where available and to build social housing or convert properties into social housing. Sheltered housing schemes for older people in local communities should be developed.</p> <ul style="list-style-type: none"> <li>• Affordable Housing: It is necessary to examine in particular the most effective way of providing affordable housing in the Gaeltacht in a way that would</li> </ul>

	<p>strengthen the use of the Irish language, including housing associations.</p> <ul style="list-style-type: none"> <li>• The Gaeltacht Islands: Provide all support to the Gaeltacht islands in relation to travel systems and infrastructure. Research the conservation areas, especially the islands, and the wind farms that influence local planning.</li> <li>• Gaeltacht Language Planning: Integrate the work programs and policies of the County Council with the Language Plans which have been approved by the Minister for the Gaeltacht in accordance with the Gaeltacht Act 2012. No policy to be implemented which contravenes these Language Plans.</li> <li>• Gaeltacht Co – operatives (Comharchumainn): That the work program and policies of the County Council be integrated with the work program of the local Co – operatives, in recognition of the essential community service provided by these Comharchumainn Ghaeltachta.</li> <li>• Gaeltacht Tourism: That Cork County Council's tourism policies to focus on established language projects and provide support for projects that will enhance the benefit of the Irish language in the Gaeltacht.</li> <li>• The implementation of these recommendations is essential if Cork County Council is to adhere to the aims of the Government's, "20 year Strategy for the Irish Language 2010 - 2030" including the preservation and promotion of the Irish language in the Gaeltacht, conservation and protection of heritage, the culture and richness of the language as well as strengthening the role of the Irish language in the home, workplace and community - a goal identified by the County Council itself.</li> <li>• The basis of every Gaeltacht Language Plan is for the increase in the number of daily Irish speakers in the Gaeltacht, and that steps must be taken to assist this.</li> </ul>
<p><b>Chief Executive's Response</b></p>	<p>This submission does not relate to any specific Proposed Amendments but rather raises a number of areas of concern in relation to the preservation and promotion of the Irish language in the Gaeltacht, conservation and protection of heritage, the culture and richness of the language as well as strengthening the role of the Irish language in the home, workplace and community and acknowledges that this is a goal identified by the County Council itself.</p> <p>The submission highlights the following areas as a concern and suggests recommendations for same:</p> <ul style="list-style-type: none"> <li>• Housing Estates;</li> <li>• Holiday homes;</li> <li>• Social &amp; Affordable Housing;</li> <li>• The Gaeltacht Islands;</li> <li>• Gaeltacht Language Planning;</li> <li>• Gaeltacht Co-operatives; and</li> <li>• Gaeltacht Tourism.</li> </ul> <p>There is a strong set of policies and objectives within the Draft County Development Plan and Proposed Amendments stages to reinforce the importance of the Gaeltacht areas and the Irish language within Cork County as set out below:</p> <ul style="list-style-type: none"> <li>➤ Proposed Amendment 1.16.27: Paragraph 16.4.12</li> <li>➤ Proposed Amendment 1.16.30: Policy Objective HE 16-22: Gaeltacht Areas</li> <li>➤ 1.10.15: Objective TO 10-5: Protection of Natural, Built and Cultural <a href="#">Features</a></li> </ul> <p>It is considered the existing policies and objectives sets a good base for the development of Gaeltacht areas while ensuring the protection and promotion of the Irish language within the Community.</p> <p>Further Material changes to wording of the Draft Plan, as requested, cannot be considered at this stage of the review process.</p>
<p><b>Chief Executive's Recommendation</b></p>	<p>No Further Action Required.</p>

Interested Party	Údarás na Gaeltachta
Ref. No.	PADP401305013
Proposed Amendment No.	4.4.2.2, 4.4.3.2, 4.4.25.1, 5.2.26.3
Submission Summary	<p>This submission welcomes the opportunity to participate in this planning process and firstly sets out Údarás na Gaeltachta’s Mission Statement and Vision and the role of its stakeholders, including Cork County Council, which the submission notes play a key role in the development and preservation of the language. The submission sets out the main Strategy Themes which form part of the Mission Statement and also the basis for each theme; Empowerment, Strengthening, Sustainability. The submission states that the vision for Gaeltacht communities that will be sustainable in all aspects of life and that will play a key role in enabling and strengthening communities to achieve this.</p> <p>The submission also makes a number of specific references regarding the Proposed Amendments to the Draft County Development Plan 2022-2028. Firstly, the submission requests that the previous suggestion regarding the mapping of the Gaeltacht Areas of the County should be reinforced and given appropriate recognition through a separate chapter entitled ‘The Gaeltacht’. It is proposed that particular reference should be made to the statutory status of Gaeltacht areas, Gaeltacht service towns and the recognition of this designated status as a rich resource in the complementary development of County Cork.</p> <p><u>Volumes 1 and 2:</u></p> <p>The submission supports the recommendations and proposed amendments set out in Volume 1 - Part 1, Key Policy Issues, and in relation to Volume 2 Heritage and Amenity the submission agrees with the amendment to paragraph (2.1.11) which sets out that the names of the townlands should be in Irish only.</p> <p><u>Volume 4: South Cork</u></p> <ul style="list-style-type: none"> <li>• Proposed Amendment 4.4.3.2: Submission recommends that the text under this paragraph be amended as follows: <b><u>BAILE SEIRBHÍSE GAELTACHTA or GAELTACHT SERVICE TOWN</u></b></li> <li>• Proposed Amendment 4.4.3.2: The submission requests that additional wording is included under MM-GO-04.</li> <li>• Proposed Amendment 4.4.2.2. – suggests further minor modifications to update the 2021 employment figures, number of people employed and number of Hubs.</li> <li>• Proposed Amendment 4.4.25.1: Údarás na Gaeltachta supports the proposal for the Irish language version - Guagán Barra.</li> </ul> <p><u>Volume 5 West Cork</u></p> <ul style="list-style-type: none"> <li>• Proposed Amendment 5.2.26.3: recommended that the text be amended to update the progress on the Gteic on Oileán Chléire.</li> </ul> <p><u>Other issues raised in the submission include;</u></p> <p>The submission requests that the following locations be included in the zoning of industrial and other material development in the Cork County Development Plan 2022-2028.</p> <ul style="list-style-type: none"> <li>• Cléire &amp; Bhéal Átha an Ghaorthaidh industrial estates.</li> </ul>

	<ul style="list-style-type: none"> <li>• Páirceanna Gnó (Business Parks) at Baile Mhic Íre, Béal Átha an Ghaorthaidh and Baile Bhuirne (including Coláiste Íosagáin).</li> <li>• Sites in Réidh na nDoirí, Cill na Martra &amp; Cúil Aodha.</li> </ul> <p>The submission also requests that Cork County Council recognize the Comharchumann Forbartha Mhúscraí Teoranta community structure in the County Development Plan 2022-2028.</p> <p>Regarding Language Planning, the submission states that Údarás na Gaeltachta are satisfied with the recommendations adopted and considered in the draft of the Plan and have nothing further to recommend in relation to the matter at this stage.</p> <p>The submission states that it is clear that the housing market (sale and rental) in the Gaeltacht areas throughout the country has failed and the submission sets out the various reasons for this. The submission states that Údarás na Gaeltachta as the main development body in the Gaeltacht area are willing to look at the land portfolio we hold and if some of that is suitable for development we are willing to co-operate with the relevant Council to achieve such an objective. The submission also states that it is particularly important to give people of Gaeltacht origin and those who are amenable or fond of the Gaeltacht and the Irish language the opportunity to settle in the area and obtain planning permission if they so wish.</p> <p>Regarding Language Conditions the submission states that it is important that such conditions are included in all new Housing Estate developments to be developed in the Múscraí Gaeltacht. It will ensure that the language is protected and that the Múscraí Language Plan is protected, and this will help to achieve the specific goals set out in that plan. It is recommended that the standard of fluency for the accepted Language Fluency Clause be raised to B1.</p> <p>Finally, the submission requests that reference is made to the official Brand 'Gaeltacht na hÉireann' that Údarás na Gaeltachta have developed for Gaeltacht producers and businesses and that it would be helpful to have this brand recognised as an integral part of the Cork County Development Plan 2022-2028 to promote the concept throughout the County and the country.</p>
<p><b>Chief Executive's Response</b></p>	<p>The submission raises many issues relating to Chapter 16 and the Gaeltacht sections in the West Cork and Macroom Municipal Districts and the scope of changes sought is beyond the legal scope of what is feasible at this late stage of the review process.</p> <p>The request for inclusion of Language Conditions for Housing Estate Developments and specific reference to the Language Fluency Clause being raised to B1 is noted. To date, Cork County Council Policy as per Proposed Amendment 1.16.30 (Policy Objective HE 16-22 (f): Gaeltacht Areas) and Proposed Amendment 1.16.27 (which includes additional text regarding promotion of Irish as the community language) address the issue of language planning and additional wording is beyond the legal scope of what is feasible at this late stage of the review process.</p> <p>This submission supports the changes set out within Volumes One and Two of the Plan and specifically Proposed Amendment 2.1.11.</p> <p>The submission requests a change to Proposed Amendment 4.4.3.2 to provide for additional text. This can be dealt with by way of a Non-Material Change within the final Plan.</p> <p>The submission requests a change to Proposed Amendment 4.4.2.2 to provide for additional text and this Minor Modification is considered appropriate.</p> <p>The submission supports the change set out in Proposed Amendment 4.4.25.1.</p>

	The submission requests a change to Proposed Amendment 5.2.26.3 to provide for additional text. This text can be updated by way of a Non-Material Change within the Final Plan.
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment No. 4.4.2.2 with Minor Modification – see Volume One Part 2 – Macroom Municipal District. Proposed Amendment 4.4.3.2: Make a Non-Material Change Adopt Proposed Amendment 4.4.25.1 with No Modification. Proposed Amendment 5.2.26.3: Make a Non-Material Change

## 17 Chapter 17 Climate Action

<b>Table 1.17</b>	<b>Chapter 17 Climate Action</b>
<b>Interested Party</b>	Transport Infrastructure Ireland
<b>Ref. No.</b>	PADP400515202
<b>Proposed Amendment No.</b>	Multiple.
<b>Submission Summary</b>	This is a duplicate of submission PADP400492339 which has been included under Chapter 12 Transport and Mobility. See above.
<b>Chief Executive's Response</b>	This is a duplicate of submission PADP400492339 which has been included under Chapter 12 Transport and Mobility. See above.
<b>Chief Executive's Recommendation</b>	This is a duplicate of submission PADP400492339 which has been included under Chapter 12 Transport and Mobility. See above.

## 18 Chapter 18 Zoning and Land Use

There were no specific submissions attributed to Chapter 18 Zoning and Land Use.

## 19 Chapter 19 Implementation and Delivery

There were no specific submissions attributed to Chapter 19 Implementation and Delivery.



## 20 Volume Two: Heritage and Amenity

<b>Table 2.1</b>	<b>Volume Two: Heritage and Amenity</b>
<b>Interested Party</b>	<b>Brian and Coreen Marten</b>
<b>Ref. No.</b>	PADP396572729
<b>Proposed Amendment No.</b>	2.1.1
<b>Submission Summary</b>	This submission relates to Volume Two: Heritage and Amenity – Record of Protected Structures and Proposed Amendment 2.1.1 (Baltimore Railway Station and Signal). The submission raises the following: <ul style="list-style-type: none"> <li>• Endorses proposal to include Baltimore Railway Station and Signal as a Protected Structure.</li> </ul>
<b>Chief Executive's Response</b>	This submission supports the change set out in Proposed Amendment 2.1.1. Baltimore Railway Station and Signal Post have regional rating on the NIAH (Ref. 20833019 & 20833020) and form part of the Ministerial recommendations for inclusion in Record of Protected Structures and it is recommended to retain Proposed Amendment 2.1.1.
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 2.1.1 with No Modification.
<b>Interested Party</b>	<b>Dermot and Diana Kennedy</b>
<b>Ref. No.</b>	PADP396578339
<b>Proposed Amendment No.</b>	2.1.1
<b>Submission Summary</b>	This submission relates to Volume Two: Heritage and Amenity – Record of Protected Structures and Proposed Amendment 2.1.1 (Baltimore Railway Station and Signal). The submission raises the following: <ul style="list-style-type: none"> <li>• Support proposal to list Baltimore Railway Station and Signal as Protected Structure.</li> </ul>
<b>Chief Executive's Response</b>	This submission supports the change set out in Proposed Amendment 2.1.1. Baltimore Railway Station and Signal Post have regional rating on the NIAH (Ref. 20833019 & 20833020) and form part of the Ministerial recommendations for inclusion in Record of Protected Structures and it is recommended to retain Proposed Amendment 2.1.1.
<b>Chief Executive's Recommendation</b>	Adopt Proposed Amendment 2.1.1 with No Modification.
<b>Interested Party</b>	<b>Dúchas Clonakilty Heritage</b>
<b>Ref. No.</b>	PADP400976114
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	This submission relates to Volume Two - Heritage and Amenity – RPS ID 01528: <ul style="list-style-type: none"> <li>• Proposed replacement of text with updated and correct description – “Corner-sited three-bay two-storey former bakery built 1930s–40s on site of older Linen Hall, with chamfered corner to south-west and double-height two-bay projection to north built as part of Linen Hall c.1817”;</li> <li>• Existing description limited to The Record of Protected Structures listing is limited to a corner-sited, two-storey building, constructed in two stages in the 1930s and 40s as a bakery, on the site of the southern part of the former Linen</li> </ul>

<b>Table 2.1</b>	<b>Volume Two: Heritage and Amenity</b>
	<p>Hall. To the north and adjoining the 1930s–1940s structure is a projection: a double-height wall which is the only remnant of the original Linen Hall. Thus, the RPS protection at present does not cover the extant remains of the Linen Hall built c.1817 but only the later bakery building.</p> <ul style="list-style-type: none"> <li>• Requests description be extended to the c.1817 Linen Hall wall, which is an important reminder of Clonakilty’s thriving linen industry in the late eighteenth and early nineteenth centuries</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission does not relate to any specific Proposed Amendment. The issue raised relates to the descriptive text for RPS ID 01528 in Clonakilty.</p> <p>It is noted that the brief description that accompanies the Record of Protected Structures List is not a full comprehensive description of the buildings that are included on the site and form part of the protected structure, but merely a concise inventory of the identifiable characteristics of building to assist members of the public. Furthermore, the particulars of each protected structure would normally be included in the Record of Protected Structures file retained by the local authority, while the list contained within the County Development Plan is merely for reference for members of the public.</p> <p>In addition, this site and adjoining buildings are located within the Clonakilty Architectural Conservation Area which allows for protection of a wider number of buildings than the Record of Protected Structures alone.</p> <p>In this case, the building description within the Record of Protected Structures for RPS ID 01528 is considered sufficient and does not need to be expanded further.</p>
<b>Chief Executive's Recommendation</b>	No further Action Required.
<b>Interested Party</b>	<b>Mitchelstown Heritage Society</b>
<b>Ref. No.</b>	PADP401355814
<b>Proposed Amendment No.</b>	N/A
<b>Submission Summary</b>	<p>This submission relates to Volume Two: Heritage and Amenity. The submission raises the following:</p> <ul style="list-style-type: none"> <li>• Commends the Record of Protected Structures and especially the inclusion of structures in Mitchelstown and environs;</li> <li>• Proposes addition of Former Christian Brothers Monastery, Mitchelstown to the Record of Protected Structures.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission does not relate to a specific Proposed Amendment as such but requests a further addition to the Record of Protected Structures.</p> <p>S.12(10)(c)(ii) of the 2000 Planning &amp; Development Act (as amended) states that Further modification to the alteration shall not be made where it refers to an addition to or deletion from the record of protected structures. Therefore, Further Material changes to the Record of Protected Structures cannot be considered at this stage of the review process.</p>
<b>Chief Executive's Recommendation</b>	No Further Action Required.
<b>Interested Party</b>	<b>Patrick Dwane</b>
<b>Ref. No.</b>	PADP396524166
<b>Proposed Amendment No.</b>	2.1.5

Table 2.1	Volume Two: Heritage and Amenity
<b>Submission Summary</b>	<p>This submission relates to Volume Two: Heritage and Amenity – Record of Protected Structures and Proposed Amendment 2.1.5. The submission raises the following:</p> <ul style="list-style-type: none"> <li>• Formal objection to proposed addition to Record of Protected Structures of 02991 (Former Fever Hospital, Mitchelstown);</li> <li>• Previous letter from Cork County Council in 2009 stating that the structure was not added to the Record of Protected Structures as part of the 2009 County Development Plan;</li> <li>• Previous professional report submitted showing condition of structure in 2008. Submission states that no modifications have been made since;</li> <li>• Correspondence from NIAH confirming that this structure was not included in Ministerial recommendations made to Elected Members under S.53 of the Planning &amp; Development Act, 2000.</li> </ul>
<b>Chief Executive's Response</b>	<p>This submission does not support the change set out in Proposed Amendment 2.1.5 and requests that the proposed addition of the Former Fever Hospital in Mitchelstown to the Record of Protected Structures be deleted. Supporting documentation has also been submitted.</p> <p>It is noted that this building was assessed for inclusion in the Record of Protected Structures in 2009 and it was subsequently recommended not to include it in the Record of Protected Structures. No further information has been provided to warrant a change to this position.</p> <p>Furthermore, it is noted that the building is afforded statutory protection under the National Monuments Act 1930 (as amended).</p>
<b>Chief Executive's Recommendation</b>	<p>Not to Adopt the Proposed Amendment 2.1.5 and Revert back to the Draft Plan.</p>



Comhairle Contae Chorcaí  
Cork County Council