

Planning Statement

Tower Pedestrian Scheme
At BAWNAFINNY, TOWER, CORK

Prepared for:

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1.0 INTRODUCTION

1.1 Overview

Tom Phillips + Associates,¹ in associated with a multi-disciplinary project design team, including Egis Group, have prepared this Planning Statement to support the proposed Part 8 Application, which relates to Tower Pedestrian Scheme at Bawnafinny, Tower, Co. Cork.

The proposed development includes the construction of a new c. 2 m wide pedestrian bridge spanning approximately 45 m over the Shournagh River, adjacent to Tower Bridge, along with associated footpath improvements along approximately 800 m of the Bawnafinny Road, several raised table crossings, junction upgrades, and enhanced signage and road markings.

As outlined in the enclosed documentation, the proposed bridge has been designed such that its piers are aligned on plan with the existing Tower Bridge piers, thereby minimising potential impacts on flow conveyance, river hydraulics, and existing site constraints. The new bridge is positioned approximately 8–9 m upstream of the existing Tower Bridge, a multi-span masonry structure of historical significance that is designated as a Protected Structure.

1.2 Project Requirement

The proposed development will deliver significant improvements to the existing pedestrian and cycling infrastructure available to residents of Tower, thereby facilitating safer and more sustainable active travel within the village. The scheme is of particular importance to residents along the Bawnafinny Road corridor, including those residing in the Gleann Fia housing estate, by providing a safer and more attractive route for access to Tower village and its associated services and amenities.

In this regard, it is noted that Cork City Council has identified and zoned additional lands within Tower for future residential development under the *Cork City Development Plan 2022-2028*. The provision of the proposed active travel infrastructure is therefore both timely and necessary, supporting not only the needs of the existing population but also accommodating future growth within the settlement. The delivery of these improvements will enhance connectivity, promote modal shift towards walking and cycling, and ensure that current and future residents can access the village in a safe and sustainable manner.

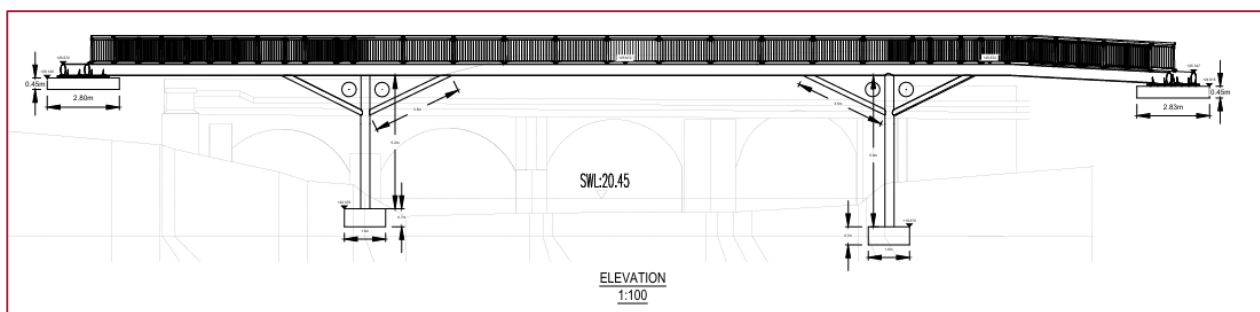


Figure 1.0: Extract of Proposed Bridge Elevation Drawing (Source: Egis, July 2026.)

¹ Mathew House, Father Mathew Street, Cork, T12 TN56.

2.0 SITE LOCATION

The subject lands are located within an established residential area on the approach to Tower village at the Bawnafinny Road and are characterised by a mix of residential development, local road infrastructure, and existing pedestrian and cycling facilities. The proposed scheme has been developed in response to the demonstrated demand for safe and accessible active travel routes within the area and seeks to address existing deficiencies in pedestrian and cyclist connectivity.

The development will provide targeted improvements along the Bawnafinny Road corridor, including upgrades to the local road network, footpaths, crossing facilities, and junction arrangements. These works will enhance accessibility, improve road safety for all users, and support increased levels of walking and cycling, thereby contributing to the delivery of a more sustainable and connected transport network for existing and future residents of Tower.

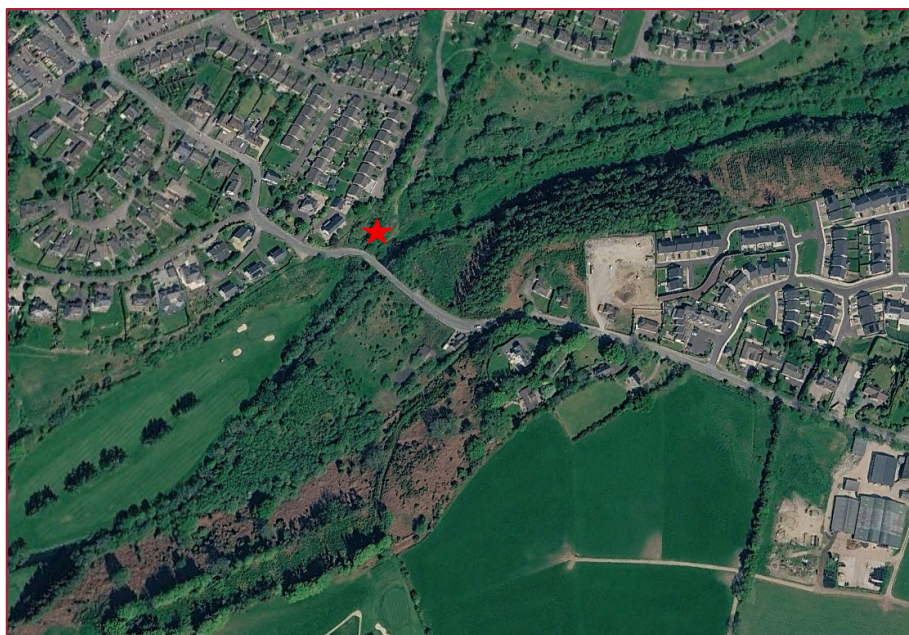


Figure 1.1: Satellite image of the Bawnafinny Road, with proposed bridge location annotated with a red star.

(Source: Mapped by Tom Phillips + Associates, October 2026.)

2.1 Multi-disciplinary Design Team

A project design team with significant experience in the preparation of Planning Applications and residential developments has been assembled by Egis Group.

The project design team includes:

- i. Egis Group – Civil Engineers;
- ii. Greenleaf Ecology – Ecological Consultants;
- iii. Holly Arboriculture – Arboriculture Consultants;
- iv. John Cronin + Associates – Conservation, Archaeology and Underwater Archaeological Consultants;
- v. John Kelleher and Associates – Public Lighting Consultants.

2.2 Legislative Context

Part 8 of the *Planning and Development Regulations 2001, (as amended)* set out the requirements in respect of certain classes of development by or on behalf of local authorities. Part 8 of the Regulations comprises 7 Articles – 79 to 85. Article 80(1) lists the type of Developments to which Part 8 is required. The proposed development is covered under the above article.

2.3 Outline of this Report

This *Planning Statement* provides a high-level planning overview of the proposed active travel improvements at Tower, Cork including development description, adherence of the proposed development to the relevant development management standards and set out the list of documents and drawings submitted as part of this Planning Application.

The *Statement* seeks to demonstrate that the proposed development is consistent with the relevant policies in a clear and concise way. A summary of the relevant policies from each policy document has been provided and our response setting out how the proposed development is compliant with the same.

3.0 DESCRIPTION OF PROPOSAL

3.1 Site Location

The subject site is located at the Bawnafinny Road (L2779), Tower, Cork. The proposed Part 8 Tower Pedestrian Scheme will include the addition of a new pedestrian bridge crossing the River Shournagh directly to the north and east of the existing Tower Bridge (RPS No. PS1159, NIAH Ref. 20907333, SMR Ref. C0073-016). As such, the proposed development will improve pedestrian and cyclist access to / from Tower town centre to existing development at Gleann Fia, to the south east of the village.

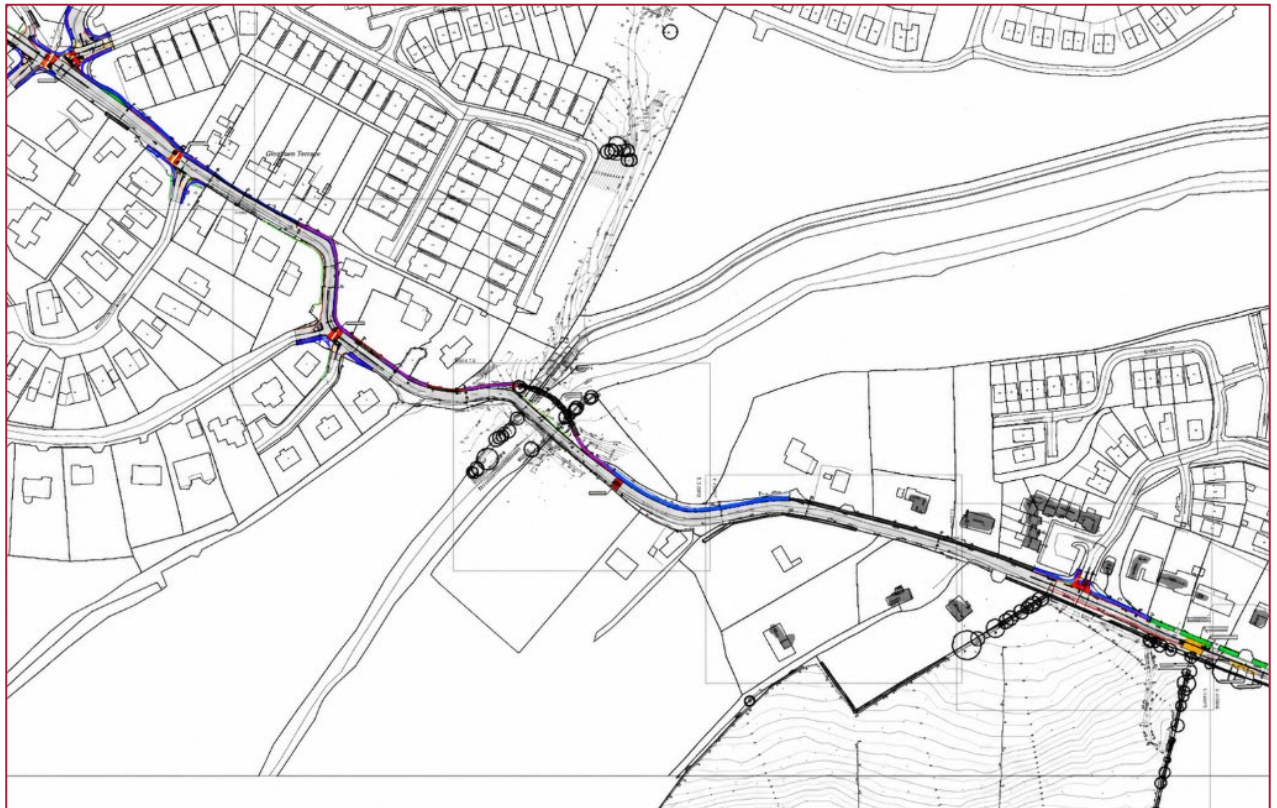


Figure 3.1: Extract of proposed road improvements overall scheme drawing prepared by Egis (Source: Egis, July 2026.)

3.2 Cork City Council Zoning

The subject site is surrounded by several land use zoning objectives, including ZO 01 – Sustainable Residential Neighbourhoods and ZO19 – Rivers and Water Bodies Protection under Map No. 18 (Tower and Hinterland) as per the City Development Plan. A walkways and cycleways route is also noted from the Bawnafinny bridge crossing.

ZO 01 objective states that it is an objective of Cork City Council to;

“To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.”

ZO 19 objective states that it is an objective of Cork City Council to;

“To protect and provide for the appropriate recreational, amenity and transport use of the City’s

rivers and waterways.”

The proposed development comprises the upgrade of existing roads and associated active travel infrastructure within Tower Village, together with the provision of a new pedestrian bridge over the River Shournagh. The proposed works are intended to enhance connectivity, accessibility and road safety for existing and future residents, while encouraging sustainable modes of transport and improving access to local services, amenities and community facilities.

The upgrading of the existing road network and provision of active travel infrastructure will support the residential function of the area by facilitating safer and more convenient movement throughout the village, thereby contributing to the objectives of ZO 01. In addition, the proposed bridge crossing will provide a sustainable transport link across the River Shournagh, enhancing permeability and accessibility for pedestrians and cyclists while enabling the appropriate transport and amenity use of the waterway corridor in accordance with the objectives of ZO 19.

Accordingly, it is considered that the proposed development is fully consistent with and supports the intent of the relevant zoning objectives contained within the Cork City Development Plan and is therefore in accordance with the zoning designations applicable to the subject area.

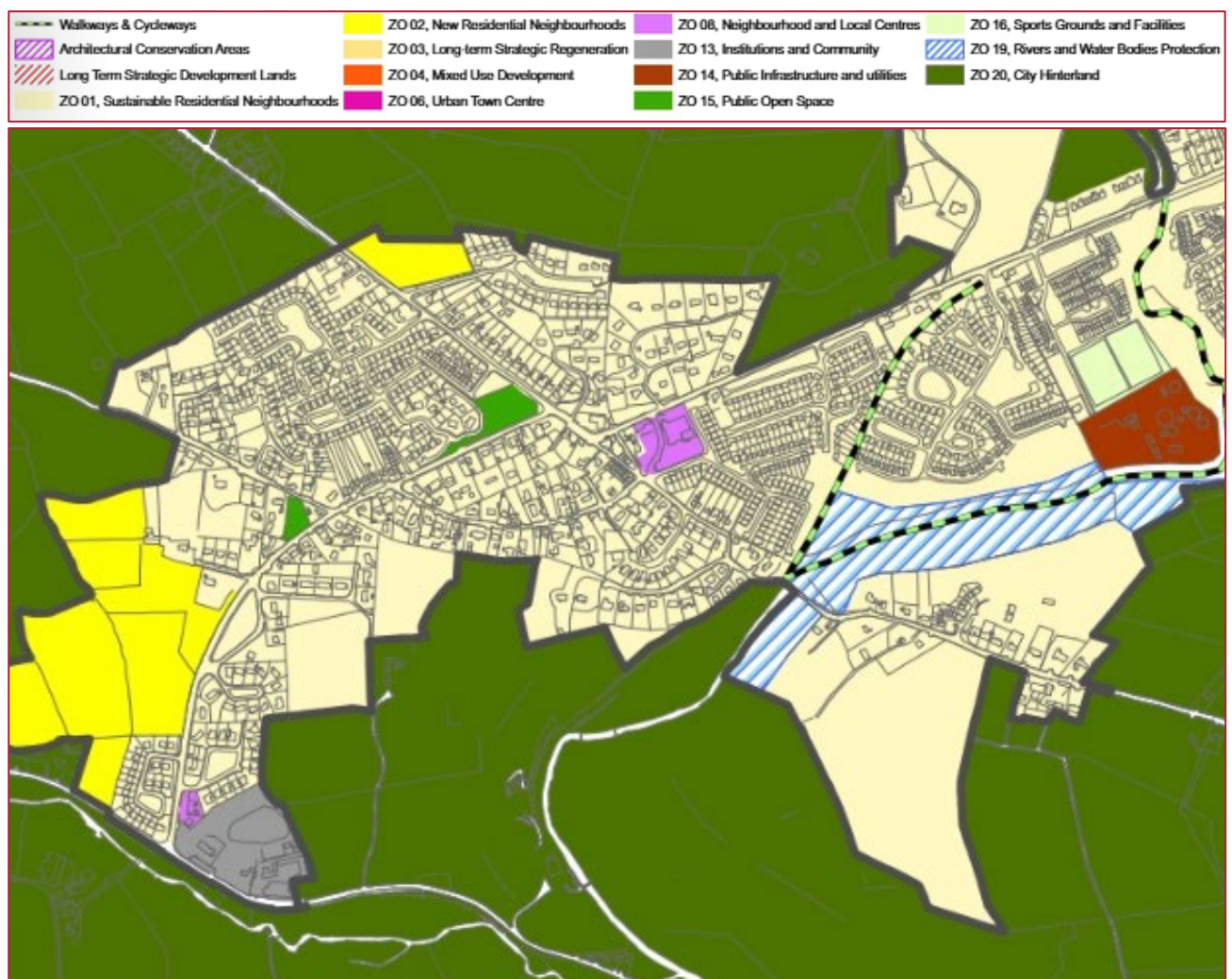


Figure 3.2: Extract of Tower Zoning Map (Source: Cork City Council, July 2026.)

3.2.1 National Policy: *Project Ireland 2040 – National Planning Framework First Revision (April 2025)*

The *National Planning Framework* (NPF) is the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF is based on 10. No. National Strategic Outcomes (NSO’s). The proposed development will positively assist in the achievement of a number of the NSO’s, including:

- NSO 1: Compact Growth.
- NSO 5: Sustainable Mobility.
- NSO 7: Enhanced Amenity and Heritage.
- NSO 8: Transition to a Low Carbon and Climate Resilient Society.

The NPF notes a requirement to accommodate approximately 50,000 additional households per annum to 2040. The NPF indicates a significant projected increase in population of 96,000 for Cork City and Suburbs to achieve a minimum population of 320,000 in this area by 2040. The NPF sets out an ambitious vision for the development of Cork, noting the need to accommodate a greater proportion of the growth it generates within its metropolitan boundaries, while offering improved housing choice, transport mobility and quality of life.

The NPF sets out significant growth projections for Cork City and the wider Cork Metropolitan Area, focussing on safeguarding balanced, connected and compact growth. There is an emphasis on ensuring future residential development and employment opportunities are located within existing urban centres. The following *Key Future Growth Enablers for Cork* set out in the NPF are of relevance to the proposed development:

X.	Key Future Growth Enabler	Statement of Consistency
3.	<i>“Implementation of a comprehensive cycle network for Cork as set out in the Cork Metropolitan Area Transport Strategy.”</i> (Source: National Planning Framework First Revision (April 2025), Page 45.)	The proposed development directly upgrades the cycle network for Tower and the settlement is included within the <i>Cork Metropolitan Area Transport Strategy</i> (CMATS) area. As such Tower is included in the proposed expanded cycle network for Cork City and Cork Metropolitan Area. The proposed development will benefit the development of this cycle network, with residents availing of the transport infrastructure and general amenity – increasing public interaction with the infrastructure and generating a safe atmosphere on the new cycle routes through increased footfall / passive surveillance.
4.	<i>“Measures to enhance and better link the existing network of green and blue spaces, in line with the County and City Biodiversity Action Plans, subject to carrying out a routing study</i>	The subject site includes a proposed new crossing over the Shournagh River, which is a central focus of the proposed development. This has been designed to protect and enhance local biodiversity, while reducing localised pollution through a reduction of car dependency.

X.	Key Future Growth Enabler	Statement of Consistency
	<i>and any necessary environmental assessments.”</i> (Source: National Planning Framework First Revision (April 2025), Page 45.)	

Table 3.1: Overview of some of the Key Future Growth Enablers for Cork from the NPF (April 2025) as they relate to the proposed development at the subject site. (Source: Project Ireland 2040 – National Planning Framework First Revision (April 2025), notes compiled by Tom Phillips + Associates, October 2026.)

It is noted that the proposed development will also connect existing and zoned residential land on the Bawnafinny Road to Tower. Emphasising the importance of developing infill sites within existing settlement boundaries, the NPF states:

“The National Planning Framework targets a significant proportion of future urban development on infill / brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.”

(Source: National Planning Framework First Revision (April 2025), Page 57.)

Thereafter, there are a number of National Policy Objectives (NPOs) set out in the NPF that are relevant to the proposed development and which the proposed development will positively assist in achieving. In particular, we consider the following NPOs to be of relevance to the proposed development:

NPO No.	National Policy Objective (NPO)	Statement of Consistency
10	<i>“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.”</i> (Source: National Planning Framework First Revision (April 2025), Page 175.)	The proposed development will assist in connecting existing and future residents of Tower to public transport facilities within the settlement in a safe manner. The proposed development is consistent with NPO No. 10.
12	<i>“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”</i> (Source: National Planning Framework First Revision (April 2025), Page 175.)	The proposed development is consistent with this policy objective through the delivery of enhanced active travel infrastructure, including upgraded footpaths, improved pedestrian facilities, dedicated cycling infrastructure and enhanced crossing points. These measures will improve the quality, safety and accessibility of the public realm within Tower, creating a more attractive and user-friendly environment for residents, visitors and vulnerable road users. The proposed upgrades will facilitate greater levels of walking and cycling by providing safe, convenient and accessible connections between residential areas, community facilities, schools, recreational amenities and

NPO No.	National Policy Objective (NPO)	Statement of Consistency
		local services. By prioritising active travel and reducing barriers to sustainable movement, the scheme will promote healthier lifestyles, encourage social interaction and support improved community well-being. Furthermore, the provision of high-quality pedestrian and cycle infrastructure will enhance connectivity throughout the village, contributing to a more integrated and inclusive community where people of all ages and abilities can travel safely and independently. The proposed works will also improve the overall quality and attractiveness of the streetscape, reinforcing the role of the public realm as a place for movement, recreation and social engagement. Accordingly, the proposed development will contribute positively to the creation of a well-designed, liveable and sustainable urban environment and is considered to be fully aligned with the objectives of the National Planning Framework in promoting high-quality places and improved quality of life for existing and future residents.
14	<i>“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress towards national achievement of the UN Sustainable Development Goals.”</i> (Source: National Planning Framework First Revision (April 2025), Page 175.)	The proposed development is consistent with this policy objective through the delivery of comprehensive active travel improvements within Tower Village, including upgraded footpaths, enhanced cycling infrastructure, improved pedestrian facilities and the provision of a new pedestrian bridge over the River Shournagh. The scheme will improve the quality, safety and accessibility of the village environment, supporting its continued growth and evolution as a sustainable and attractive place to live, work and visit. By enhancing connectivity between residential areas, schools, community facilities, recreational amenities and local services, the proposed development will strengthen the function and vitality of the village centre while supporting existing and future population growth. The delivery of high-quality walking and cycling infrastructure will encourage a modal shift towards more sustainable forms of transport, reducing reliance on private car use and contributing to broader climate action and sustainability objectives. The proposed works will also deliver significant placemaking benefits through improvements to the public realm, creating a more attractive, accessible and welcoming environment for residents and visitors.

NPO No.	National Policy Objective (NPO)	Statement of Consistency
		Enhanced pedestrian and cyclist facilities will encourage greater levels of activity within the village, supporting social interaction, community cohesion and the overall vitality of the area. In this regard, the proposal will contribute to the regeneration and enhancement of Tower Village as a high-quality and liveable settlement. Furthermore, the scheme supports several of the United Nations Sustainable Development Goals, including the promotion of sustainable communities, improved health and well-being, climate action and sustainable transport. The proposed development therefore represents a strategic investment in the long-term sustainability, resilience and attractiveness of Tower. Accordingly, it is considered that the proposed development accords with the objectives of the National Planning Framework by facilitating the ongoing regeneration and enhancement of the village through the provision of high-quality active travel infrastructure, improved connectivity and an enhanced public realm.
23	<i>“Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape including island communities that make Ireland’s rural areas authentic and attractive as places to live, work and visit. Any successor policy documents relating to national policy for rural areas and the islands will ensure continued alignment and consistency with the National Policy Objectives of this Framework.”</i> (Source: National Planning Framework First Revision (April 2025), Page 177.)	The proposed development is consistent with this policy objective as it seeks to enhance the accessibility, safety and attractiveness of Tower Village while respecting and reinforcing the character of the local environment. Through the provision of upgraded footpaths, improved cycling infrastructure and a new pedestrian bridge over the River Shournagh, the scheme will improve connections within the village and strengthen access to local amenities, community facilities and recreational areas.
37	<i>“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”</i> (Source: National Planning Framework First Revision (April 2025), Page 178.)	The proposal has been designed to integrate with the existing village setting and surrounding landscape, providing essential infrastructure improvements that support sustainable mobility without altering the established character or identity of the area. By encouraging walking and cycling, the development will facilitate greater appreciation and enjoyment of the local environment, river corridor and surrounding rural landscape by residents and visitors alike.

NPO No.	National Policy Objective (NPO)	Statement of Consistency
		The enhanced active travel network will contribute to the long-term vitality and attractiveness of Tower Village as a place to live, work and visit, supporting sustainable patterns of movement while fostering a stronger connection between the community and its natural and built heritage assets. The provision of safe and accessible pedestrian and cycling facilities will also improve access to recreational opportunities and local services, thereby enhancing quality of life and promoting social inclusion. Accordingly, the proposed development supports the objectives of the National Planning Framework by protecting and enhancing the distinct character and sense of place of the area, while delivering sustainable transport infrastructure that will contribute to the continued attractiveness, accessibility and resilience of the village and its surrounding environment.
38	<i>“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”</i> (Source: National Planning Framework First Revision (April 2025), Page 179.)	The proposed development is consistent with this policy objective through the provision of enhanced active travel infrastructure, including upgraded footpaths, improved pedestrian facilities, dedicated cycling infrastructure and a new pedestrian bridge over the River Shournagh. The proposed works will improve accessibility, connectivity and safety for all users, including pedestrians, cyclists, older persons, children and those with reduced mobility. The scheme has been assessed from a DMURS compliance perspective. By removing existing barriers to movement and providing safer and more direct walking and cycling routes, the scheme will improve access to schools, community facilities, recreational amenities, public services and local businesses within Tower Village. The enhanced active travel network will promote equality of opportunity by enabling a wider range of people to travel independently and safely, regardless of age, ability or access to a private vehicle. The proposed development will also support the creation of a more integrated and sustainable community by strengthening connections between residential areas and key destinations throughout the village. The provision of high-quality active travel infrastructure will encourage greater levels of walking and cycling, improve public health outcomes and foster greater social interaction and community cohesion.

NPO No.	National Policy Objective (NPO)	Statement of Consistency
89	<i>“Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.”</i> (Source: National Planning Framework First Revision (April 2025), Page 185.)	The proposed development has been designed having careful regard to the natural, cultural and built heritage assets within and adjoining the study area and is therefore consistent with the above policy objective. A protected structure comprising the existing bridge crossing the River Shournagh is located adjacent to the proposed pedestrian bridge. In recognition of the heritage significance of this structure, a detailed assessment of the potential impacts of the proposed development on its character, setting and significance has been undertaken. The design and siting of the proposed bridge have been informed by these assessments to ensure that any effects on the protected structure are avoided, minimised and appropriately mitigated. The proposed development will not adversely affect the special interest or heritage value of the protected structure and will preserve its architectural and historical significance. In addition, a comprehensive programme of archaeological assessment has been carried out to inform the design and development of the scheme. This has included both terrestrial and aquatic archaeological investigations, reflecting the location of the proposed bridge crossing and associated works in and adjacent to the River Shournagh. The findings of these assessments have informed the project design and appropriate mitigation measures, ensuring that any archaeological features, deposits or areas of potential archaeological interest are identified, protected and managed in accordance with best practice and relevant statutory requirements. The proposed development also incorporates environmental safeguards and construction management measures to protect the ecological and physical characteristics of the River Shournagh and its surrounding environment during the construction and operational phases of the project. Accordingly, it is considered that the proposed development accords with the objectives of the National Planning Framework by recognising and responding appropriately to the heritage sensitivities of the site, including the adjacent protected structure and archaeological resource, while facilitating the delivery of essential active travel infrastructure that will provide significant community and sustainable transport benefits.

NPO No.	National Policy Objective (NPO)	Statement of Consistency
93	<i>“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green and blue infrastructure planning and innovative design solutions.”</i> (Source: <i>National Planning Framework First Revision</i> (April 2025), Page 185.)	The scheme will contribute to an improved quality of life for existing and future residents by creating a safer, more attractive and accessible public realm that supports sustainable mobility and encourages active lifestyles. The enhanced connectivity provided by the development will assist in ensuring that essential services and community facilities are more readily accessible to all members of the community. Accordingly, it is considered that the proposed development strongly aligns with the objectives of the National Planning Framework by promoting social inclusion, accessibility and equality of opportunity through the delivery of high-quality active travel infrastructure that supports sustainable and connected communities.

Table 3.2: Overview of the National Policy Objectives (NPOs) relevant to the proposed development, including a statement on how the proposed development is consistent with the corresponding NPO. (Source: *Project Ireland 2040 – National Planning Framework First Revision* (April 2025), notes compiled by Tom Phillips + Associates, October 2026.)

3.2.2 National Policy: The *Climate Action Plan* (2025)

The *Climate Action Plan* (2025), released in April 2025, is the latest annual update to Ireland’s *Climate Action Plan* (2019). It delivers on carbon budgets and sectoral emissions targets. The documents outline a clear pathway to cut Ireland’s emissions in half by 2030 and achieve net zero no later than 2050 in line with commitments in the *Programme for Government*. The *Plan* highlights how Ireland can accelerate the measures needed to address the climate crisis, placing climate action at the core of the country’s social and economic development.

The proposed development is strongly aligned with the objectives of the *Climate Action Plan* 2025 through the provision of enhanced active travel infrastructure within Tower Village, including upgraded footpaths, improved pedestrian facilities, dedicated cycling infrastructure and the construction of a new pedestrian bridge over the River Shournagh. Collectively, these measures will support and encourage a shift towards sustainable modes of transport by providing safe, convenient and attractive alternatives to private vehicle use for local journeys.

3.2.3 National Policy: The *Design Manual for Urban Roads and Streets* (DMURS) (2019)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The Manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement.

The proposed development has been designed in accordance with DMURS principles and achieves a sense of place and residential amenity whilst also facilitating efficient and secure movement. Cyclist and pedestrian movements are prioritised within the scheme via a shared surface, multiple access points and

ease of connectivity to adjacent high quality footpaths and cycle paths. This is outlined further in the enclosed DMURS Compliance Statement prepared by Egis which concludes that:

“The proposed road improvement scheme has been developed in accordance with the principles of DMURS, providing enhanced pedestrian and cyclist facilities while maintaining appropriate vehicular access. Significant design risks have been considered throughout the design process and, where reasonably practicable, have been eliminated or reduced by design. Remaining residual risks are considered typical for infrastructure projects of this nature and can be managed through appropriate construction planning, maintenance procedures and operational management.”

(Source: DMURS Compliance Note, prepared by Egis.)

3.2.4 National Policy: The Architectural Heritage Protection Guidelines for Planning Authorities (2011)

The *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) state that all developments which may potentially impact Protected Structures or places designated as Architectural Conservation Areas must have regard to these *Guidelines*. We note that the proposed development is not located adjacent to any and it is not within or adjacent to any Architectural Conservation Areas.

A protected structure is noted adjoining a part of the proposed development, Tower Bridge (RPS Ref. PS1159) as per Volume 3 – Built Heritage Objectives of the Development Plan. This has been assessed for conservation impact by John Cronin and Associates accordingly.

3.2.5 National Policy: The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009). These *Guidelines* introduce the principle of a risk-based sequential approach to managing flood risk.

As part of the suite of documents submitted, a *Site-Specific Flood Risk Assessment* (SSFRA) was prepared by Egis. The site is located adjacent to the Shournagh River within the River Lee catchment. A review of historical flood records identified a recorded flood event at Tower Bridge in June 1990. In addition, CFRAM flood mapping and the Lee Catchment Flood Risk Management Plan indicate that the river corridor is susceptible to fluvial flooding.

The proposed bridge is located immediately upstream of the existing Tower Bridge and has been designed such that its supporting piers are aligned with the existing bridge piers. Although the bridge deck follows a curved alignment, the pier locations have been selected to coincide with the existing hydraulic control points within the river channel towards the left and right banks allowing to maintain the river effective width. The soffit level of the proposed bridge is 25.27 m AOD. This design approach minimises interruption to flood flows, reduces the potential for debris accumulation, and helps ensure that the proposed development does not adversely affect water levels or flood conveyance during design flood events.

The proposed bridge foundations shall be designed to accommodate potential scour associated with design flood events. Where required, local scour protection in the form of rock armour or equivalent erosion protection measures shall be provided around bridge supports. The proposed development has been assessed in accordance with the sequential approach set out in the FRM Guidelines. The development is classified as Less Vulnerable Development, comprising transport and active travel infrastructure. The bridge

is necessarily located at a river crossing and therefore cannot reasonably be located outside the river corridor.

A detailed hydraulic assessment has been undertaken as part of the OPW Section 50 application to assess the interaction between the proposed bridge and the existing flood regime. The assessment demonstrates that the proposed bridge will not result in any significant adverse impact on flood flow conveyance, floodplain storage or flood levels within the Shournagh River.

The proposed bridge has been designed with its piers aligned with the existing Tower Bridge piers, thereby minimising obstruction to flood flows and reducing potential hydraulic impacts during flood events. The active travel works outside of the bridge are to take place in Flood Zone C areas and therefore no flood risk issues arise.

Existing flood conveyance routes within the Shournagh River channel should be maintained throughout the construction period. Based on the available information and the results of the hydraulic assessment, the proposed development is not expected to increase flood risk at the site or elsewhere. Subject to the implementation of the proposed design and mitigation measures, the development is considered acceptable from a flood risk management perspective

3.2.6 National Policy: *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009)

The *Appropriate Assessment Guidance* was published to guide compliance with the *Birds Directive*, 1979 and the *Habitats Directive*, 1992 as implemented in Irish law by Part XAB of the *Planning and Development Act 2000* (as amended).

Greenleaf Ecology have prepared an *Appropriate Assessment (AA) Screening* to accompany this application. It outlines the information required for the competent authority to screen for *Appropriate Assessment* and to determine whether the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of any potential the European site.

The enclosed *Appropriate Assessment Screening*, prepared by Greenleaf Ecology states;

"This AA screening report was completed with due regard to relevant European Commission guidance, national guidance and case law. The potential impacts of the proposed development have been considered in the context of the European sites potentially affected, their qualifying interests or special conservation interests, and their conservation objectives. Through an assessment of the source-pathway-receptor model, which considered the zone of influence of effects from the proposed development and the potential in-combination effects with other plans or projects, the following are the main conclusions:

*The proposed Tower Pedestrian Scheme, Bawnafinny, Tower, Cork, either alone or in-combination with other plans and/or projects, **does not have the potential to significantly affect any European site, in light of their conservation objectives. Therefore, a Stage 2 Appropriate Assessment is deemed not to be required.**"* [Our Emphasis]

Please refer to the enclosed *Appropriate Assessment Screening Report* prepared by Greenleaf Ecology for further information in this regard.

3.3 Regional Policy: Overview

This section examines the consistency of the proposed development against the following regional policy documents:

- The *Southern Regional Assembly Regional Spatial and Economic Strategy* (RSES)(2020);
- The *Cork Metropolitan Area Transport Strategy* (CMATS) (2020).

We set out how the proposed development is consistent with each of the above relevant policies in the Sections below.

3.3.1 Regional Policy: *Southern Region Assembly Regional Spatial and Economic Strategy* (RSES) (2020)

The *Regional Spatial and Economic Strategy* (RSES) is a strategic framework for future development, guiding regional planning and economic growth across the Southern Region. It highlights key assets, opportunities, and challenges, while setting out policy responses through Regional Policy Objectives (RPOs).

The RSES has a statutory role in supporting the delivery of the National Planning Framework (NPF). Within it, the *Cork Metropolitan Area Strategic Plan* (MASP) provides a framework for sustainable development and investment in the Cork Metropolitan Area to 2031.

The settlement / built-up urban area of Tower is within the Cork Metropolitan Area.

The MASP, which covers the subject site, reinforces Metropolitan Cork's role as an international centre of scale to complement Dublin, with an anticipated population growth of 50–60% by 2040. A number of RPOs directly support the proposed development and provide strong regional policy support for the project.

3.3.2 Regional Policy: *Cork Metropolitan Area Transport Strategy* (CMATS) (2020)

The *Cork Metropolitan Area Transport Strategy* (CMATS) (2020) prepared by the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council to address the projected growth in the Cork Metropolitan Area and is derived to ensure that the aspirations of the *National Planning Framework* is achieved. Additionally, CMATS is aligned with national-level '*Climate Action Plan*' policy document and is committed to facilitating the shift towards sustainable and active modes of travel within Cork City and surrounding Metropolitan Area.

The introduction to CMATS defines the CMATS policy document as:

"CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area. It sets out a framework for the planning and delivery of transport infrastructure and services to support the CMA's development in the period up to 2040."

(Source: *Cork Metropolitan Area Transport Strategy* (2020), Page 3.)

CMATS places a strong emphasis on directing development along designated high-capacity public transport corridors and enhancement of active travel facilities.

3.3.3 Local Policy: The *Cork City Development Plan 2022-2028*

Having reviewed the *Cork City Development Plan 2022-2028*, it is considered that the proposed development accords with a number of the Plan's Strategic Objectives (SOs), which provide the overarching framework for the sustainable growth and development of Cork City. These objectives are aligned with the National Planning Framework and the United Nations Sustainable Development Goals and seek to guide development in a manner that promotes sustainable communities, climate resilience, accessibility and quality placemaking.

The proposed active travel scheme is considered to support several key Strategic Objectives, including SO3 – Transport and Mobility, SO4 – Climate and Environment, and SO9 – Placemaking and Managing Development.

SO3 – Transport and Mobility

SO3 seeks to promote sustainable and integrated transport networks that improve accessibility, connectivity and mobility throughout the city. The proposed development directly supports this objective through the delivery of enhanced active travel infrastructure, including upgraded footpaths, improved pedestrian crossing facilities, dedicated cycling infrastructure and a new pedestrian and cyclist over the River Shournagh. The scheme will improve connectivity between existing and planned residential areas, schools, community facilities, recreational amenities and local services within Tower Village.

The proposed works will provide safer and more attractive facilities for pedestrians and cyclists, encouraging a modal shift away from private car use towards more sustainable forms of transport. Furthermore, the enhanced active travel network will complement existing and planned public transport services within the area, contributing to a more integrated and sustainable transport system. Importantly, the proposed development will address longstanding connectivity constraints within the village and facilitate improved access to lands identified for future growth, thereby supporting the strategic transport objectives of the Development Plan and the wider objectives of the Cork Metropolitan Area Transport Strategy (CMATS).

SO4 – Climate and Environment

SO4 seeks to support climate action through sustainable development patterns, reduced transport emissions and the promotion of low-carbon transport choices. The proposed development will contribute positively to national, regional and local climate objectives by facilitating increased levels of walking and cycling and reducing dependence on private vehicle trips for local journeys. The delivery of safe and convenient active travel infrastructure will encourage more sustainable travel behaviours amongst existing and future residents of Tower Village. The scheme also supports the efficient and sustainable development of lands identified for growth under the Development Plan by ensuring that future residential development can be connected to the village centre and associated services through high-quality active travel routes. In this regard, the proposal represents critical enabling infrastructure that will promote compact growth and sustainable settlement patterns in accordance with climate and environmental objectives.

SO9 – Placemaking and Managing Development

SO9 seeks to promote high-quality placemaking and the creation of attractive, inclusive and accessible environments that enhance quality of life. The proposed development will significantly improve the public realm within Tower Village through the provision of upgraded pedestrian and cycling infrastructure and safer connections between key destinations. The scheme will create a more accessible, attractive and user-friendly environment, enhancing the experience of residents, visitors and vulnerable road users alike. The improved active travel network will encourage greater levels of social interaction, recreational activity and community engagement while providing safe and convenient access to schools, community facilities and open spaces. The proposed bridge crossing of the River Shournagh will further enhance permeability and connectivity within the village, helping to create a more cohesive and walkable settlement.

Core Strategy

In addition to the above Strategic Objectives, the proposed development will assist in the implementation of the Core Strategy of the Cork City Development Plan by facilitating the sustainable growth of Tower Village. The scheme represents key enabling infrastructure that will help unlock residentially zoned lands identified for future development within the settlement.

By improving accessibility, connectivity and active travel opportunities, the proposed works will support the delivery of planned housing growth in an integrated and sustainable manner, ensuring that future development is supported by appropriate transport infrastructure. As such, the proposal will contribute to the achievement of the Development Plan's strategic objectives for compact growth, sustainable mobility and the creation of high-quality communities.

Accordingly, it is considered that the proposed development is fully consistent with the Strategic Objectives of the Cork City Development Plan and will make a significant contribution towards the sustainable development and future growth of Tower Village.

4.0 SUPPORTIVE ASSESSMENTS

It should be noted that the proposed development has been informed by a comprehensive suite of technical, environmental and engineering assessments undertaken throughout the design process. These assessments have been prepared by appropriately qualified specialists and have informed the design evolution of the scheme in an iterative manner, ensuring that environmental, heritage, engineering, transport and planning considerations have been fully integrated into the development of the proposal.

The supporting documentation demonstrates that the proposed development has been subject to a robust assessment process and that potential impacts have been identified, assessed and addressed through design refinement and, where necessary, the incorporation of appropriate mitigation measures.

Given the presence of a protected structure in the vicinity of the proposed bridge crossing and the location of works adjacent to and within the River Shournagh, detailed archaeological, underwater archaeological and architectural heritage assessments were undertaken to ensure that the design of the project appropriately responds to the cultural heritage sensitivities of the area.

In this regard the enclosed documentation prepared by John Cronin & Associates concludes that the new pedestrian and cycle bridge has been designed to avoid any significant direct impacts on the fabric and architectural form of the existing protected bridge. The new pedestrian and cycle bridge is of a high-quality contemporary form and will be clearly legible as a modern intervention.

Ecological and environmental assessments have been undertaken by Greenleaf Ecology. These assessments informed the design and construction methodology of the scheme and ensure that ecological receptors, habitats and species are appropriately protected throughout the delivery of the project.

In this regard, we note that an EIA Screening, concludes;

“This assessment concluded that no significant effects on the environment are considered likely to arise. On this basis it is considered that the development does not require Environmental Impact Assessment and that an EIAR is not necessary.”

This EIA Screening was supported by a bat survey, undertaken by Greenleaf Ecology and an aquatic survey undertaken by Mayfly Ecology. Please refer to the enclosed EIA Screening Statement prepared by Greenleaf Ecology enclosed for further information in this regard. Appropriate Assessment is discussed in Section 3.2.6 above.

In relation to bats, the recommendations of the project ecologist, Greenleaf Ecology, are noted. These include the adoption of an appropriate bat-friendly public lighting specification. The specification of lighting can be determined at tender and detailed design stage, with the recommended mitigation measures implemented as part of the construction and operational phases of the proposed development.

Arboricultural impact has also been assessed by Holly Arb. This assessment identifies existing tree resources within the study area and has informed the design process to minimise impacts on trees where feasible and to guide appropriate protection measures during construction. In this regard, it is noted that cherry laurel specimens were identified within the Arboricultural Assessment prepared for the proposed development. The management and control of these specimens, from an invasive species perspective, will be addressed as part of the construction and implementation phase of the development.

Collectively, the above assessments demonstrate that the proposed development has been developed through a multidisciplinary and evidence-based approach. The iterative design process has ensured that environmental, engineering, transport, heritage, ecological and placemaking considerations have been fully evaluated and incorporated into the final design, resulting in a robust and sustainable proposal that is capable of being delivered without giving rise to significant adverse impacts.

5.0 CONCLUSION

As demonstrated throughout this *Planning Statement*, together with the accompanying Part 8 documentation, the proposed active travel scheme for Tower Village has been developed through a comprehensive and iterative design process informed by extensive stakeholder engagement, technical assessment and environmental appraisal. The proposed development will deliver significant improvements to active travel infrastructure within Tower Village through the upgrade of existing roads, footpaths and pedestrian facilities, the provision of dedicated cycling infrastructure, and the construction of a new pedestrian bridge over the River Shournagh. The scheme has been designed to improve connectivity, accessibility and safety for all road users while supporting a transition towards more sustainable modes of transport.

The development will provide substantial benefits for existing and future residents by creating a safer, more attractive and more accessible environment for walking and cycling. Enhanced connections between residential areas, schools, community facilities, recreational amenities and local services will encourage active travel, improve permeability throughout the village and reduce reliance on private car use for local journeys. The proposed development also represents key enabling infrastructure for the future growth of Tower Village. By addressing existing connectivity constraints and improving sustainable transport links within the settlement, the scheme will assist in unlocking residentially zoned lands identified for development under the Cork City Development Plan and support the delivery of the Core Strategy for the area.

Throughout the design process, careful consideration has been given to environmental, ecological, archaeological, architectural heritage, flood risk, transportation and engineering matters. A comprehensive suite of supporting assessments has informed the evolution of the proposal, ensuring that the final design responds appropriately to the opportunities and constraints of the receiving environment. In particular, the design has had regard to the adjacent protected structure, the River Shournagh and associated ecological and archaeological sensitivities, with appropriate mitigation measures incorporated where required.

It is considered that the proposed development accords with the relevant provisions of the *National Planning Framework, Climate Action Plan 2025, Regional Spatial and Economic Strategy for the Southern Region* and *Cork City Development Plan 2022-2028*. The proposal will make a positive contribution towards the achievement of national, regional and local objectives relating to sustainable mobility, climate action, placemaking, social inclusion, accessibility and compact growth.

Accordingly, it is concluded that the proposed development constitutes a sustainable and appropriate form of development and is consistent with the proper planning and sustainable development of the area.

We trust that this Part 8 submission is in order. Should any clarification or additional information be required in relation to the enclosed plans, particulars or supporting documentation, we would be pleased to assist.

Yours Sincerely,



Órla Casey
Associate
Tom Phillips + Associates