

Development Plan Submissions
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork City

By email; citydevplan@corkcity.ie

Dáta | Date

27 September, 2021

Ár dTag | Our Ref.

TII21-114115

Bhur dTag | Your Ref.

RE: Draft Plan Consultation - Cork City Development Plan, 2022 - 2028

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Cork City Development Plan, 2022 - 2028. In the preparation of this submission, TII has taken account of Project 2040 policies (National Planning Framework and National Development Plan), EU Ten-T Regulations, Section 28 Guidelines including Spatial Planning and National Roads Guidelines for Planning Authorities, Retail Planning Guidelines, the Regional Spatial and Economic Strategy for the Southern Region, the Cork Metropolitan Area Transport Strategy, the existing Metropolitan Cork Joint Retail Strategy and Cork City Council documents associated with the development plan review.

The following observations are outlined for the consideration of the Planning Authority:

A. NATIONAL AND REGIONAL POLICY FRAMEWORK, STATUTORY GUIDANCE & TRANSPORT

As previously advised the national road network is a critical enabler in facilitating an island wide sustainable national transport system.

Such high value assets and amenities need to be protected and their use enhanced for the City, County, Region and the country as a whole. This is to support economic and community interaction across a range of sectors in the region and beyond including providing regional connectivity, addressing peripherality, empowering rural communities and facilitating access to critical services such as education, healthcare, employment and enterprise.

TII, with the support of European, national and regional policy, considers that improving and maintaining the assets of all national roads is critical.

The planning authority is reminded that the National Planning Framework indicates it is necessary to;

- improve regional connectivity in tandem with targeted urban growth strategies for Cork, Galway Limerick and Waterford. Specifically, Project 2040 National Strategic Outcome no 2 Enhanced Regional Accessibility (page 140 National Planning Framework) indicates:

“Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancement.”

In addition, National Strategic Outcome 6 High-Quality International Connectivity identifies as crucial for overall international competitiveness investment by improving land transport connections to the major ports including: access to Ringaskiddy Port and ensuring careful land-use management of land-side areas to focus on the current and future needs of airports.



It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

The Council will also be aware that the N20, N22, N27, N28 and N40, national primary roads, are part of the EU TEN-T Core and Comprehensive network. These Trans-European road networks, as laid out by Article 9 of Decision 661/2010/EU, is to include motorways and high-quality roads, whether existing, new or to be adapted, which: play an important role in long-distance traffic, and provide interconnection with other modes of transport. The network is expected to guarantee users a high, uniform and continuous level of services, comfort and safety. The consequences of these designations will and should influence development planning, management and other transport schemes. TII advises that it is not clear if this network of national roads has been appropriately considered in strategic policy objectives associated with the City growth nor transport.

The City Council will also be aware that Regional Policy Objective RPO 140 International Connectivity of the Southern Region RSES states that it is an objective to:

‘a. Sustainably maintain, support and enhance the Region’s International Connectivity Transport Network including the Trans European Transport Network (TEN-T) which seeks the development of a Europewide network of railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals.

‘b. Sustainably maintain the strategic capacity and safety of the national roads and rail network including planning for future capacity enhancements to ensure effective land transport connections to the major ports, airports and markets.

c. Support the role of our strategic road and sustainable transport networks including connectivity to the TEN-T Core and Comprehensive Network, connecting the Region’s metropolitan areas, key towns, ports and airports with the Atlantic Economic Corridor, extended Dublin-Belfast Eastern Corridor and other urban networks as identified through Section 3.8 of the RSES and City and County Development Plans’.

Within Regional Policy Objective RPO 151, Integration of Land Use and Transport, the following principles of land use and transport integration are indicated to guide development:

‘e. Land use development in smaller rural towns will optimise public transport and sustainable travel integration within settlements. Public transport interchange will be facilitated to encourage modal shift to public transport and sustainable travel between settlements and on approach to settlements. The strategic transport function of national roads will be maintained and protected in accordance with national policy;

In addition, Section 6.3.6.3 ‘Transport Priorities for the Cork Metropolitan Area’ highlights the need for the maintenance and enhancement of the strategic road network (including national roads), catering for transport demand within the Metropolitan Area. While Section 6.3.6.6 ‘Road Network’ highlights that the NPF sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors and that the steady-state maintenance and safety of the National Roads network is critical to ensure that the existing extensive transport networks are maintained to a high level and to ensure high-quality levels of service, accessibility and connectivity for transport users.

Regional Policy Objective RPO 166 ‘Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors’ also states:

‘c. Maintain the efficiency and safety of the existing national primary and secondary roads network by targeted transport demand management and infrastructure improvements.’

As the Council is aware, TII seeks to ensure that these official European, national and regional overarching objectives are promoted and that the anticipated benefits of the investment (projects and maintenance) made and to be made in the national road network is not jeopardised. These priorities are also supported by implementation of national policy in relation to development and national roads, including associated interchanges and junctions, as set out in the statutory Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).

Allied to the above statutory policy documents, TII would highlight that the Cork Metropolitan Area Transport Strategy (CMATS) indicates a major reliance on strategic roads such as the N28 (connecting with Ringaskiddy), N27 (connecting with Cork Airport), N40, M8, N25 and N20 for national, regional and local connectivity. The Strategy also indicates that maintaining the capacity of the roads with optimal levels of service is of critical importance for growing the economy of Cork. TII would also highlight that CMATS outlines in Chapter 13 the “Requirements of National Road Network”.

Therefore, it is with serious concern that, despite statements in Appendix 1 (Page 553), TII observes that the implementation of European, national and regional policies as they relate to national roads are omitted from the Draft Plan in policies, objectives and zonings and the requirements to fulfil these policies has not been addressed in policies, objectives and zonings in the Draft Development Plan.

It is critically important, given the classifications and functions of the national road network in Cork City’s jurisdiction, that the Draft Plan policies and objectives are reviewed and included in an amended Development Plan which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland’s economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is also a critical need to manage national road assets in accordance with national policy as outlined in: the National Planning Framework, the National Development Plan, the provisions of the Section 28 Guidelines; Spatial Planning and National Roads Guidelines for Planning Authorities, the Retail Planning Guidelines 2012, the Regional Spatial and Economic Strategy for the Southern Region, and the Cork Metropolitan Area Transport Strategy.

Recommendation

- TII recommends that Chapters 2, 4, 7, 10, 11, and 12, including zoning objectives, of the Draft Development Plan are reviewed comprehensively and amended accordingly to have regard to the provisions of these national and regional policy documents outlined especially the Statutory Section 28 ministerial guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).

TII advises that the amended Draft Development Plan policies, objectives and zonings should indicate clear recognition of European, National and regional policies for the protection and maintenance of the safety, operation and efficiency of national roads which serve Cork City, the Southern Region, the nation and also facilitate international connectivity. This should be 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.

B. CORE AND DEVELOPMENT STRATEGY

Cork City has a strong social and economic base with an excellent natural environment, extensive employment sector, strong third-level education facilities, a modern airport with significant port facilities, a tradition of good strategic land use planning, a large hinterland with regionally important towns and an outstanding natural setting.

As already highlighted, TII seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Cork is protected and that the relevant policies/objectives included in the existing City Development Plan are continued and improved in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). However, it appears that this precedence has not been continued in the current Draft Plan as demonstrated by this submission and the lack of recognition of the national roads network in Chapter 2, including the figures/concept diagrams.

The Authority advises that the DOELG Spatial Planning and National Road Guidelines for Planning Authorities set out planning policy considerations relating to development affecting national primary and secondary roads, including motorways and associated junctions, outside the 50-60 kph speed limit zones for cities, towns and villages.

The Council is also reminded that the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires that where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- Ensuring such development is evidence based and supported by appropriate assessments of road capacity, junction structure and provision of suitable transport alternatives,
- protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements,
- ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development, and
- Improving operational efficiency of the regional and local road and transportation infrastructure – e.g., where appropriate, promoting new regional and local road networks and alternative modes.

This must be based on an evidence-based approach to planning policy. The Council is advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the local authority. Such schemes will not be funded by TII. Thus, costs should be integrated within future local development contributions schemes.

In addition, it is noted with concern that the M20 and M28, national road schemes, are not included in the “Growth Targets 2040” despite the acknowledgments of these schemes as RSES Transport Priorities for the Cork Metropolitan Area, the National Planning Framework, the projects interactions with other transport schemes and also their inclusion in Chapter 4 of the Draft Plan.

It would therefore appear to TII that these matters related for the protection and maintenance of national roads have not been considered nor addressed in the Draft Development Plan despite the requirements outlined Part A.

Recommendation

- TII recommends that the Council’s Draft Development Plan is amended to have regard to the provisions of these national and regional policy documents especially Statutory Section 28 ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). There should be especially clear recognition of European, National and regional policies for the protection and maintenance of safety, operation and efficiency of national roads which serve Cork City, the Southern Region, the nation and also to facilitate international connectivity in Chapter 2 including the figures and diagrams. It is advised that this systematic review should commence by consideration of the contents of this submission.

C. CHAPTER 7 ECONOMY AND EMPLOYMENT

The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities require that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on critical national road infrastructure.

1) Strategic Employment Locations

TII notes with serious concern the inclusion in Section 7.41, Cork City Strategic Employment Locations Study and also associated zoning (Z0 10 & Z0 05) of predominantly greenfield lands in this study at and/or in close proximity to national roads. This Study and associated zonings appear to have been drafted without reference to the protection of the existing and future national road network, and the evidence-based assessment required by the Spatial Planning and National Roads Guidelines for Planning Authorities. It is noted that this policy and zonings are supported by Chapter 10 and also Sections 11.175 & 11.176.

In addition, TII advise that that there was no consultation with TII with regard to the Cork City Strategic Employment Locations Study. It is also noted that a number of these sites do not correspond to the Strategic Employment Locations, Mixed Use Employment & Regional Assets identified in the RSES.

The lands of particular concern included in Objective 7.10 are as follows:

▪ **Strategic Employment Site 1; Blarney Business Park Extension (M/N20).**

TII would highlight that the Blarney Business Park has direct access to the N20 at 100kph speed limit, via a private access road. The intensification of use of this private access road at this location proposed by this zoning would adversely impact on the existing N20. It should be noted that the existing N20 will remain in place until such time the M20 is completed. Therefore, in TII's opinion, the proposed zoning would be at variance with Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. 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.

▪ **Strategic Employment Site 4; Lands at Glanmire (M8).**

The greenfield lands at Glanmire at M8 Junction 18, are in TII's opinion are at variance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. In addition, TII advise that the zoning is located within an area being considered for the Cork North Ring Road/N40 scheme and could seriously prejudice plans for the design of the scheme which would be at variance with Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

The Authority has special interest in seeking to ensure that development will not prevent or compromise plans for new national roads, including indicative routes, e.g., provision made in planning authority development plans, or approved routes for such roads, nor interfere with the future upgrade of existing national roads.

The proposed 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. In addition, TII would emphasise that the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities require that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road infrastructure.

▪ **Strategic Employment Site 5; South Link Industrial Estate (N27).**

In the absence of an evidence base with recommendations for transport mitigations, this zoning would have the potential to adversely impact on the existing N27, national road, especially as it appears that a mixed development is proposed with a wide variety of uses. Therefore, the proposed zoning would be at variance with Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. 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.

As indicated under Part A above, there are clear overarching European, national and regional requirements relating to maintaining the strategic capacity and safety of the national roads network. In this instance it appears that these policies and requirements have not been considered by the planning authority and this Study with regard to the existing N20, N27 and the M8. This is even more of a concern given that it is observed that that no such evidence-based material has been made available to support the zoning of these lands. This is despite the location of these zonings in proximity to the M8, N27 and N20 which are part of the EU TEN-T network, and also considerable exchequer investment made and proposed in the national roads network for future projects and maintenance.

Recommendation

- In TII's opinion, the Cork City Strategic Employment Locations Study and also associated zonings (Z0 10 & Z0 05) are inappropriate and are at variance with DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and European, national and regional policies. TII recommends that the zoning objectives and associated policies in Chapter 7, Chapter 10 and Sections 11.175 & 11.176 of the Draft Development Plan are reviewed comprehensively and amended extensively to have regard to the provisions of these national and regional policy documents outlined, especially the Statutory Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012).

TII advises that the amended Draft Development Plan policies, objectives and zonings should consider and demonstrate compliance with European, National and regional policies for the protection and maintenance of the safety, operation and efficiency of national roads which serve Cork City, the Southern Region, the nation and also facilitate international connectivity. This should be 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.

While it is noted that the Draft Plan is accompanied by a Strategic Employment Study Appendix, this Study was only made available on the Development Plan Consultation Portal on 16 September, 2021. It is further noted that the Study contains no detail on the transportation requirements and implications of the identified Strategic Employment Sites on the national road network and contains no evidence base requirements outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) pertaining to development proposals in the vicinity of national roads and associated junctions.

2) Retail

TII notes reference to the preparation and completion of a Joint Retail Study for the Metropolitan Area under Objective 7.26 Strategic Retail Objectives. TII would also highlight that it has not been party to the preparation of the Joint Retail Study for the Metropolitan Area despite the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as it relates to retail.

Recommendation

- The Authority considers the approach advocated in the Draft Development Plan for retail could be considered premature pending the preparation and finalisation of the Joint Retail Study for the Metropolitan Area, and, therefore, requests that this element of the Draft Plan be revised accordingly. TII should be a party to the preparation of the Joint Retail Study for the Metropolitan Area having regard to the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as it relates to retail.

D. CHAPTER 10 KEY GROWTH AREAS AND NEIGHBOURHOOD DEVELOPMENT SITES

1) Tivoli

The Council will be aware of National Strategic Outcome 2 of the National Planning Framework (NPF). This outcome includes the objective to maintain the strategic capacity and safety of the national roads network. Also, it is an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. In addition, the statutory Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) were prepared to set out planning policy considerations relating to development affecting motorways, national primary and secondary roads. It is noted with concern that the Section 28 Guidance is not referenced in Section 10.146 of the Draft Plan.

TII seeks to ensure that these official national objectives are not undermined and that the anticipated benefits of the investment made in the national road network are not jeopardised. This is the case with regard to the N8 and the Dunkettle Interchange.

As you are aware the N8 at Tivoli has a range of speed limits greater than 50kph (including 100kph) and also forms/impacts on part of the significant investment been made available by Government in the Dunkettle Interchange Upgrade Scheme. The Dunkettle Interchange is of paramount importance for the City, the Region and also the nation as a critical enabler. It is important that any plan at this location ensures the appropriate operation, management and safety of the national road network.

TII considers it is reasonable to exercise caution and would expect close collaboration from the City Council in the assessment of future development plans and proposals impacting on the operation of the national road and its

associated junction(s) in accordance with national road policy included in the statutory Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), the NPF and NDP. It should also be noted that the Design Manual for Urban Roads and Streets (DMURS) does not apply in areas where a speed limit greater than 60kph apply.

From evaluation of the details available in the Draft Development Plan, it would appear that matters related to national road policy associated with the NPF, NDP and the Section 28 DoECLG Spatial Planning and National Roads Guidelines (2012) have not been addressed nor referred to adequately. This is disappointing given previous TII submissions and interactions starting from June, 2017. These submissions highlighted the need to consider national planning statutory guidance and the importance of the national road network reflected in both the drafts of the Cork Metropolitan Transport Strategy (CMATS) and Regional Spatial and Economic Strategy for the Southern Region.

With regard to the Eastern Access, TII would highlight that Section 13 of the Cork Metropolitan Transport Strategy indicates:

*"Tivoli Access: Improved access to cater for public transport, pedestrians, cyclists and general traffic is required to develop the Tivoli Docks site as a new urban district, following the relocation of Port of Cork to Ringaskiddy. A more detailed analysis as part of the LAP process will be required to determine the appropriate level of transport infrastructure required including a **potential eastern access.**"*

From examining the material provided in the text, TII is of the opinion that the eastern N8 Dunkettle Access indicated on Figure 10.31 will impact adversely on the Dunkettle Interchange Upgrade Scheme. TII considers and has continually emphasised that the detailed analysis required to determine the appropriate level of transport infrastructure required, including a potential eastern access, has not been undertaken appropriately and is done so in the absence of consultation with TII.

Recommendation

- Due to the issues outlined, TII is currently unable to support the material in its current form included in Section 3 Tivoli Docks, pages 350-378. The current document, in TII's opinion, requires revision to address the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, the proposal interaction with the N8 and Dunkettle Interchange Upgrade Scheme including its operation, management and safety and also the potential eastern access in accordance with national roads and transport policy.

2) Cork International Airport

The Council will also be aware that along with the N20, N22, N27, N28 and N40, national roads, Cork International Airport is part of the EU TEN-T Core Network. In this regard, it is critical that protection of the N27, national road, under Objective 10.49 'Development of additional Airport Business Park' is provided as the main connection to the city and the region in accordance with requirements of the National Planning Framework, the RSES and CMATS to maintain and protect the national road network.

National Strategic Outcome 6 High-Quality International Connectivity identifies, as crucial for overall international competitiveness, investment by ensuring careful land-use management of land-side areas to focus on the current and future needs of airports.

This should include for outlining of specialised and particular demand management measures in an amended Draft Development Plan for the Airport Business Park Objective 10.49 to ensure that unsustainable use of the private car by commuters is not promoted.

Recommendation

- The N27, N40, national roads, and Cork International Airport is part of the EU TEN-T Core Network. TII recommends that Objective 10.49 of the Draft Development Plan is amended to have regard to the provisions of these national and regional policy documents especially National Strategic Outcome 6, CMATS, and Statutory Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) for the national road network and the maintenance of surface access to airport activities.

It is considered that the intention to deal with transport mitigation matters at development management stage by individual planning applications is inappropriate and unacceptable for these elements of the critical EU TEN-T Core Network.

3) City Suburbs Objectives

TII notes that greenfield outer suburban lands which formed part of uncompleted Proposed Amendment No 1 to the Ballincollig/Carrigaline MD Local Area Plan 2017 at Castletreasure have been included in the Z0 02 New Res Neighborhoods zoning, Tier 3 Zone, Section 10.319 and Objective 10.82 of the Draft Development Plan. This is despite the lack of resolution of the serious concerns raised by TII at the time. In addition, TII would highlight that under footnote 4 Section 2.11.2 listing “assumptions applied to estimate potential yield” is not included in the text in Chapter 2.

The Council is reminded that National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. In addition, National Strategic Outcome 6 High-Quality International Connectivity identifies, as crucial for overall international competitiveness, investment by improving land transport connections to the major ports including: access to Ringaskiddy Port.

This proposed outer suburban greenfield zone is located in close proximity to the N28 junction and is also contiguous with lands the subject of the M28 Cork to Ringaskiddy Project Motorway Scheme. From TII’s perspective, the Authority, at this location, seeks the protection of the national road network and its junctions, with respect to strategic traffic on the N28, and the future M28 Cork to Ringaskiddy Project Motorway Scheme, as part of the EU Core TEN-T network.

As outlined throughout this text, the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) require that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road infrastructure.

TII would again highlight that this location was evaluated as part of the Cork County Council’s Strategic Land Reserve Final Report published in October, 2018. TII observes that this analysis indicates that:

“Given existing congestion in the area and the pending nature of the CMATS and the M28, development of these SLR lands would require more detailed consideration from a traffic and transportation perspective, including the issue of how the land can be accessed and the timeline for the delivery of roads and transportation improvements for the area”.

However, it is observed that that no such evidence-based material has been made available to support the zoning of these lands by Cork City Council. It is also considered that the intention to deal with significant transport mitigation matters at development management stage is inappropriate and unacceptable, in particular, given the location of the lands in proximity to the N28, national road, part of the EU TEN-T Core Network and considerable potential exchequer investment in the M28 and the function of that route in facilitating strategic traffic.

In TII’s opinion, the proposed zoning and associated Objective 10.82 is premature pending the planning authority demonstrating that the proposed zoning can proceed complementary to safeguarding the capacity, safety and operational efficiency of the N28 and potential future M28 motorway scheme, including at the R609 interchange junction in accordance with the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

The Authority has special interest in seeking to ensure that development will not prevent or compromise plans for new national roads, including indicative routes, e.g. provision made in planning authority development plans, or approved routes for such roads, nor interfere with the future upgrade of existing national roads.

Recommendation

- TII strongly recommends that appropriate traffic and transportation analysis needs to be prepared by the City Council to understand the impacts at this location on the M28/N28 mainline and its interchange, with existing, permitted and planned development and also should identify the evidenced based methods/techniques proposed for any mitigations and/or works traversing/in proximity to the national road network including phasing and costs. This analysis will also need to be complementary to the provision of appropriate sustainable transport development and the delivery of CMATS. TII has previously advised that it would be most appropriate to undertake the required assessments prior to proceeding with the zoning and associated objective 10.82.

Such an assessment is a requirement given the outer suburban location of the site, the potential for reliance of this area on the private car for transport, delivery of the *Cork Metropolitan Area Strategic Plan* with supporting proposals in the *Cork Metropolitan Area Transport Strategy* (CMATS), precedence of the Douglas Land Use & Transport Strategy (DLUTS) and, critically, the need to implement the National Planning Framework, National Strategic Outcomes 2 and 6 with regards to the role of the N28 within the EU Core TEN-T network.

E. OTHER ISSUES

a) Zoning Maps and national road projects

TII notes with concern the lack of recognition of national roads, national road projects (approved and proceeding) included on the zoning maps and figures in the Draft Development Plan. TII advises that this oversight is not conducive to the Draft Development Plan implementation nor the processing of planning applications through development management. TII recommends that this critical matter is resolved in an amended Draft Development Plan.

b) Safeguarding national road drainage regimes

TII would welcome consideration being given to including a new objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes. Significant improvements to the national road network have been undertaken and maintained in the Council area. There is an onus and a policy requirement on road and planning authorities to safeguard the national investment made. In that regard, TII has experienced a number of instances nationally where private development proposals have accessed or sought to access national road drainage regimes to dispose of surface water drainage, including in Cork.

National road surface water drainage regimes are constructed with the objective of disposing of national road surface water, it is important that capacity in the drainage regime be retained to address this function. Having regard to the national road network in Cork City.

Recommendation

- TII would welcome consideration of a new Objective included in the Development Plan outlining that:

‘The capacity and efficiency of the national road network drainage regimes in Cork City will be safeguarded.’

CONCLUSION

Having regard to the foregoing, the Authority recommends this correspondence is reflected in an amended Draft Development Plan which would reflect the provisions of European, national and regional policies and also demonstrate the importance of developing an evidence-based approach at Development Plan stage for proposals with implications for the on-going safe and efficient operation of national roads.

In summary, the Planning Authority is advised to ensure in the review of the Development Plan:

- The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained, and

- An integrated approach to land use and transportation solutions throughout the City should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e., non-national) road network.

TII as always remains available to discuss the issues outlined and to assist the Council Executive in terms of technical expertise and experience in the amendments of the Draft Development Plan in developing a sustainable land use and transport-based planning framework for Cork City.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Tara Spain', written in a cursive style.

Tara Spain
Head of Land Use Planning