

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

By email; citydevplan@corkcity.ie

Dáta | Date

27 April 2022

Ár dTag | Our Ref.

TII22-118077

Bhur dTag | Your Ref.

RE: Cork City Development Plan - Proposed Material Amendments

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 attached report outlines TII's observations for the consideration of the Planning Authority with respect to Proposed Material Amendments.

Having regard to the report, 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



Tara Spain
Head of Land Use Plan

TII Observations Cork City Council Part 1 Material Amendments to Volume 1 Development Plan Text

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|--|
| 1.3 | <p>TII notes with concern the inclusion of bullet 1. 15 which refers to the preparation of framework plans but advises that it does not imply that no development proposals will be considered prior to the framework plan being prepared. The amendment also does not outline the process and governance mechanisms for not only Framework Plans but also masterplans or development briefs.</p> <p>TII advises that the terms, framework plan, strategy, and masterplan are used in a significant number of different capacities throughout the draft development plan with no detailed consistency in the governance nor nature of the outputs to be achieved within a statutory framework.</p> <p>This is a serious concern for TII, as a number of these “forward” planning processes proposed in the vicinity of the strategic national road network, including the M8 N27, N20 N28 and N40. The location, nature and character of these areas have significant consequences for the operation, efficiency and safety of the national road network as well as the need to ensure the protection of the significant government exchequer which has and will be invested into the infrastructure.</p> <p>TII would highlight that the DoECLG Sustainable Residential Development in Urban Areas Guidelines outline that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks.</p> <p>TII is of the opinion that where such frameworks 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 incorporate them by variation to the development plan or local area plan as advised by this guidance and also in the interests of public transparency.</p> | <p>The Authority requests that this issue of the preparation of Frameworks, masterplans etc in the development plan are clarified and associated with a statutory basis to provide transparency and to facilitate consultation, liaison and evidence base requirements required by official policy provisions.</p> <p>Accordingly, TII suggests the following wording amendment in red for the Councils consideration.</p> <p>“1.15 Where framework plans are indicated for an area, this does not imply that no development proposals will be considered prior to the framework plan being prepared except where otherwise required by local objective/ zoning. In the cast of local objectives, the Framework Plans will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and incorporated into the Development Plan as a variation/amendment in accordance with the requirements of official policy. In other instances, the scale, mix and form of any such development and its associated infrastructure will need to be designed to successfully integrate with the existing and emerging local neighbourhood and wider city area.</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|--|
| 1.11. | <p>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.</p> <p>Sections 2.4 details that where a development plan or local area plan proposes development to take place on zoned lands adjacent to national roads which could affect the operation and capacity of such roads, the planning authority <u>must prepare its plans in such a way that demonstrates that such roads can continue to perform their strategic transport function into the future</u> by:</p> <ul style="list-style-type: none"> • protecting undeveloped lands adjoining national roads and junctions from development so as to cater for potential capacity and safety enhancements (in consultation with and subject to the agreement of the NRA now TII). • ensuring, where appropriate, and taking account of DOELG Spatial Planning and National Road Guidelines for Planning Authorities that capacity enhancements and/or traffic management measures can be put in place to facilitate new development around national roads and associated junctions, together with enhancement funding mechanisms, and • improving operational efficiency of the non-national road and transportation infrastructure – e.g., where appropriate, promoting new non-national road networks and alternative transport/travel modes. <p>Planning authorities such as Cork City Council must therefore develop an evidence-based approach to planning policy and undertake detailed transport modelling, as necessary.</p> <p>Section 2.7 Development at National Road Interchanges or Junctions, DOELG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires 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.</p> <p>TII advises that the guidance indicates that planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design</p> | <p>TII advise that for the lands at Blarney and Glanmire “<i>where there is market demand for a location alongside the strategic road network</i>”, this amendment and supporting documentation do not demonstrate the requirements outlined in Sections 2.4, 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on national road has been addressed.</p> <p>In this regard these zoning locations should be omitted and associated objectives altered until such time as the requirements under Sections 2.4, 2.7 and 2.9 of statutory guidance DOELG Spatial Planning and National Road Guidelines for Planning Authorities has been addressed.</p> |

| | | |
|--|--|--|
| | <p>assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.</p> <p>TII again would highlight that evidence-based approach outlined in the planning policy above has not been demonstrated in the Cork City Strategic Employment Locations Study especially with respect to lands at Blarney and Glanmire.</p> <p>Section 2.9 of DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires the Protection of Alignments for Future National Road Projects. This section details 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. Inappropriate zonings are contrary to the broader public interest concerning the achievement of value for money for the taxpayer and can significantly increase the cost of land to be acquired for national road schemes. Such zoning decisions could make the road project uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme. This is of particular importance for the Blarney (M20) and Glanmire (N40 NNR) locations</p> <p>In the opinion of the Authority, the proposed development plan and the Cork City Strategic Employment Locations Study with respect to lands at Blarney and Glanmire do not provide the evidence base required under Sections 2.4, 2.7 and 2.9 DOELG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on existing and proposed national roads and necessary mitigations.</p> <p>In this regard these zoning locations at Blarney and Glanmire should be omitted until such time as the evidence base has been developed in accordance with statutory guidance outlined.</p> | |
|--|--|--|

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|--|
| 1.12 | <p>TII notes with concern the lack of recognition of national roads which link Cork City, the regional and national driver (see amendment 1.49, 1.51, and 1.52) to the cities of Limerick Waterford, Dublin, the west to Kerry, Port, Airport and the entire Cork Region, all national road projects (approved and proceeding) included on the zoning maps and in particular figure 2.8 in the amended Draft Development Plan.</p> | <p>TII recommends that the national roads which link Cork City to the cities of Limerick, Waterford, Dublin, the west to Kerry, Port, Airport and the entire Cork Region, all national road projects (approved and proceeding) are included on the zoning maps and in particular figure 2.8 in the adopted Draft Development Plan.</p> |
| 1.29 | <p>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 adopted Draft Development Plan.</p> <p>TII notes with concern the lack of recognition of national roads which link Cork City as a regional and national driver (see amendment 1.49, 1.51, and 1.52) to the cities of Limerick, Waterford, Dublin, the west to Kerry, Port, Airport and the entire Cork Region, all national road projects (approved and proceeding) included on the zoning maps and in particular figure 2.8 in the amended Draft Development Plan.</p> <p>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 adopted Draft Development Plan.</p> | <p>TII recommends that the national roads which link Cork City to the cities of Limerick, Waterford, Dublin, the west to Kerry, Port, Airport and the entire Cork Region, all national road projects (approved and proceeding) are included on the zoning maps and in particular figure 2.8 in the adopted Draft Development Plan.</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|--|
| 1.74 | <p>TII notes Objective 3.13 with respect to Rural Generated Housing, TII are seriously concerned with regard to provisions of this amendment and that of amendment no. 1.102.</p> <p>The Council will be aware that Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines clearly outline; <i>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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.</i></p> <p>In that regard, the Authority is strongly of the opinion that the amendment is altered to cross reference amendment 1.102 as amended by TII to ensure adherence to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).</p> | <p>TII recommends that:</p> <ol style="list-style-type: none"> 1. Amendment no 1.102. Obj. 4.7 should be altered as follows in red and strikethrough: Objective 4.7 Protection of National Roads: To protect the strategic transport function of national roads, including motorways through the implementation of the 'Spatial Planning and National Roads Guidelines for Planning Authorities' DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations. No new accesses or intensification of existing accesses will be permitted where a speed limit greater than 60 kph applies. For existing developments with current access outside the defined speed limits, proposals for expansion of same must be accompanied by a Traffic and Transportation impact assessment. Proposals for new developments and intensification of existing developments within speed control zones 50-60 kph must seek to avoid a proliferation of entrances, and be accompanied by a Traffic and Transportation assessment and a road safety audit. 2. Amendment no 1.74 is altered to cross reference amendment no 1.102. Obj. 4.7 as amended by TII above to ensure adherence to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|---|
| 1.75 | <p>TII notes Objective 3.139 with respect to One Off Housing Demonstratable Need to Reside on Land Holding. TII are seriously concerned with regard to provisions of this amendment and that of amendment no. 1.102. The Council will be aware that Section 2.5 of the DOECLG Spatial Planning and National Roads Guidelines clearly outline; <i>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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.</i></p> <p>In that regard, the Authority is strongly of the opinion that the amendment is altered to cross reference amendment 1.102 as amended by TII to ensure adherence to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DOECLG, 2012).</p> | <p>TII recommends that:</p> <ol style="list-style-type: none"> 1. Amendment no 1.102. Obj. 4.7 should be amended as follows in red and strikethrough: follows: Objective 4.7 Protection of National Roads To protect the strategic transport function of national roads, including motorways through the implementation of the 'Spatial Planning and National Roads Guidelines for Planning Authorities' DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations. No new accesses or intensification of existing accesses will be permitted where a speed limit greater than 60 kph applies. For existing developments with current access outside the defined speed limits, proposals for expansion of same must be accompanied by a Traffic and Transportation impact assessment. Proposals for new developments and intensification of existing developments within speed control zones 50-60 kph must seek to avoid a proliferation of entrances, and be accompanied by a Traffic and Transportation assessment and a road safety audit. 2. Amendment no.1.75 is altered to cross reference amendment no 1.102. Obj. 4.7 as amended by TII above to ensure adherence to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DOECLG, 2012). |
| 1.95 | <p>TII requests the reference to Northern Ring Road (NRR) be updated to Cork Northern Transport Project.</p> | <p>TII requests the Northern Ring Road (NRR) be updated to Cork Northern Transport Project</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|--|
| 1.102 | <p>TII are seriously concerned with regard to provisions of this amendment which is not in accordance with Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.</p> <p>The Council will be aware that Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities clearly outline:</p> <p><i>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 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.</i></p> <p>In the case of Transitional Zones: <i>Where the plan area incorporates sections of national roads on the approaches to or exit from urban centres that are subject to a speed limit of 60 kmh before a lower 50 kmh limit is encountered – otherwise known as transitional zones - the plan may provide for a limited level of direct access to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the NRA’s requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, must be avoided.</i></p> <p>For lands adjoining National Roads within 50 kmh speed limits: <i>Access to national roads will be considered by planning authorities in accordance with normal road safety, traffic management and urban design criteria for built up areas.</i></p> <p>In that regard, the Authority is strongly of the opinion that this amendment should be amended to accurately ensure adherence to the provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).</p> | <p>TII recommends that amendment no 1.102. Obj. 4.7 should be amended as follows:</p> <p>Objective 4.7 Protection of National Roads To protect the strategic transport function of national roads, including motorways through the implementation of the ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations. No new accesses or intensification of existing accesses will be permitted where a speed limit greater than 60 kph applies. For existing developments with current access outside the defined speed limits, proposals for expansion of same must be accompanied by a Traffic and Transportation impact assessment. Proposals for new developments and intensification of existing developments within speed control zones 50-60 kph must seek to avoid a proliferation of entrances, and be accompanied by a Traffic and Transportation assessment and a road safety audit.</p> <p>The Authority is strongly of the opinion that that amendment no.1. 102. Obj. 4.7 is amended as detailed to ensure adherence to the provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|--|
| 1.144 | <p>As highlighted in amendment no 1.11 and other amendments, 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.</p> <p>Sections 2.4 details that where a development plan or local area plan proposes development to take place on zoned lands adjacent to national roads which could affect the operation and capacity of such roads, the planning authority <u>must prepare its plans in such a way that demonstrates that such roads can continue to perform their strategic transport function into the future by:</u></p> <ul style="list-style-type: none"> protecting undeveloped lands adjoining national roads and junctions from development so as to cater for potential capacity and safety enhancements (in consultation with and subject to the agreement of the NRA now TII). ensuring, where appropriate, and taking account of DOELG Spatial Planning and National Road Guidelines for Planning Authorities that capacity enhancements and/or traffic management measures can be put in place to facilitate new development around national roads and associated junctions, together with enhancement funding mechanisms, and improving operational efficiency of the non-national road and transportation infrastructure – e.g., where appropriate, promoting new non-national road networks and alternative transport/travel modes. <p>Planning authorities such as Cork City Council must therefore develop an evidence-based approach to planning policy and undertake detailed transport modelling, as necessary.</p> <p>Section 2.7 Development at National Road Interchanges or Junctions, DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires 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.</p> | <p>TII advise that for the proposed lands at Blarney and Glanmire “<i>where there is market demand for a location alongside the strategic road network...</i>”, which are facilitated by this amendment, do not demonstrate the requirements outlined in Sections 2.4, 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on national road have been met.</p> <p>In this regard these zoning locations should be omitted until such time as the requirements in Sections 2.4, 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities has been developed in accordance with statutory guidance outlined.</p> <p>TII recommends that this amendment is altered as follows:</p> <p><i>“The Development Plan provides for approximately XXX ha of zoned, undeveloped employment lands that also includes an allowance for employment from proposals within the City Centre Core, Town Centres, District Centres and mixed-use sites over the period to 2028. The Plan has taken forward some of the recommended new strategic employment lands listed in the SELS and in total identifies xx new strategic employment locations. These have been targeted at or within close proximity of areas with higher unemployment rates as it the case with the new employment locations at Hollyhill, Clogheen, Fairhill and Ballyvolane. Lands at Blarney and Glanmire, South Link Industrial Estate have been identified owing to the proximity to successful employment facilities or where there is market demand for a location alongside the strategic road network.”</i></p> |

Planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII again would highlight that evidence-based approach outlined in the planning policy above has not been demonstrated in the Cork City Strategic Employment Locations Study especially with respect to lands at Blarney and Glanmire .

Section 2.9 of DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires the Protection of Alignments for Future National Road Projects. This section details 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. Inappropriate zonings are contrary to the broader public interest concerning the achievement of value for money for the taxpayer and can significantly increase the cost of land to be acquired for national road schemes. Such zoning decisions could make the road project uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme. This is of particular importance for the Blarney (M20) and Glanmire (N40 NNR) locations.

In the opinion of the Authority, the proposed development plan and the Cork City Strategic Employment Locations Study with respect to lands at Blarney and Glanmire do not provide the evidence base required under Sections 2.4, 2.7 and 2.9 DOELG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on existing and proposed national roads and necessary mitigations .

In this regard these zoning locations Blarney and Glanmire should be omitted until such time as the evidence base has been developed in accordance with statutory guidance outlined .

| Amendment Reference no | TII Observation | TII Recommendation |
|--|--|--|
| <p>1.150 Strategic Emp. Site 4</p> | <p>With reference to the details highlighted in Amendments 1.11, and 1.144 above, Planning authorities such as Cork City Council must in Sections 2.4 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities.</p> <p>However, in this instance the planning authority has outlined the preparation of a masterplan with no details of its governance nor statutory remit at this important location for the national road network.. TII considers that the approach identified in the Development Plan and Proposed Amendments to be inappropriate in lieu of a statutory plan led approach given the nature and character of the proposals and the location which would impact the M8 and its associated junction as well the NDP Cork Northern Transport Project (N40)</p> <p>The Council is also reminded that Section 2.7 Development at National Road Interchanges or Junctions , DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires 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.</p> <p>They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.</p> <p>TII again would highlight that an appropriate evidence-based approach as outlined in the planning policy above has not been demonstrated by the Cork City Strategic Employment Locations Study nor the development plan especially with respect to these lands at Glanmire.</p> <p>TII also advise that Section 2.9 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires the Protection of Alignments for Future National Road Projects. This section details 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. Inappropriate zonings</p> | <p>TII advise that for lands facilitated by this amendment, an evidence base required in accordance with Sections 2.4 ,2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities has not been demonstrated in relation to impact on national road as and the Cork City Strategic Employment Locations Study.</p> <p>TII considers that this zoning location is premature and recommends that it be omitted until such time as the statutory evidence base has been developed in accordance with statutory guidance outlined. In addition, the omission of the zoning at this stage will avoid the potential to undermine existing capacity , safety and efficiency of the existing national road network, and to make NDP road projects such as the Cork Northern Transport Project , uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme as well as the existing network.</p> |

| | |
|---|--|
| <p>are contrary to the broader public interest concerning the achievement of value for money for the taxpayer and can significantly increase the cost of land to be acquired for national road schemes. Such zoning decisions could make the road project uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme.</p> <p>In the opinion of the Authority, these matters have not been considered with respect to proposed new employment zonings and the Cork Northern Transport Project (N40) north of Glanmire.</p> <p>In the opinion of the Authority, the development plan and the Cork City Strategic Employment Locations Study with respect to lands at Glanmire do not provide the evidence base required under Sections 2.4, 2.7 and 2.9 DOELG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on existing and proposed national roads and necessary mitigations.</p> <p>In this regard these zoning locations should be omitted and associated objectives amended until such time as the requirements and evidence base has been developed in accordance with statutory guidance outlined .</p> | |
|---|--|

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|---|
| 1.151 | <p>With respect to Site no 5 South Link Road and also Amendment nos. 1.305 and 1.344, 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.</p> <p>In association with Amendment nos. 1.305 and 1.344, there remains potential for other development objectives, individually and in combination, to adversely affect the operation of the national road and associated junctions in the N27 and N40 if the cumulative impact of development is not planned for and co-ordinated with required infrastructure improvements to safeguard sufficient capacity on the strategic national road network</p> <p>The Council is reminded that the Sections 2.4 details that where a development plan or local area plan proposes development to take place on zoned lands adjacent to national roads which could affect the operation and capacity of such roads, the planning authority must prepare its plans in such a way that demonstrates that such roads can continue to perform their strategic transport function into the future by:</p> <ul style="list-style-type: none"> • protecting undeveloped lands adjoining national roads and junctions from development so as to cater for potential capacity and safety enhancements (in consultation with and subject to the agreement of the NRA (now TII). • ensuring, where appropriate, and taking account of DOELG Spatial Planning and National Road Guidelines for Planning Authorities that capacity enhancements and/or traffic management measures can be put in place to facilitate new development around national roads and associated junctions, together with enhancement funding mechanisms, and • improving operational efficiency of the non-national road and transportation infrastructure – e.g., where appropriate, promoting new non-national road networks and alternative transport/travel modes. <p>TII would highlight that no evidence-based approach outlined in the national planning policy above has not been demonstrated by the proposed development plan for these lands at South Link Industrial Estate especially in relation to managing transport requirements on the N27 and N40. An opportunity to coordinate an approach would be provided by the preparation of a statutorily based Framework Plan in as recommended by TII amendments 1.305 and 1.344 below.</p> | <p>The Council will be aware of the requirement to apply the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DOELG, 2012) for such development proposals in the vicinity of the strategic national road network.</p> <p>TII recommends that a co-ordinated approach to the development of the lands is required which shall address access and transport infrastructure measures and mitigation required to ensure development proceeds complementary to safeguarding the strategic function of the national road network, and associated junctions, in the area. In particular a local objective should be included to providing an alternative access strategy to the N27. This should also be acknowledged by alterations to Amendment nos. 1.305. and 1.344 as recommended by TII.</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|---|
| 1.158 and 1.165 | <p>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 DOELG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and Retail Planning Guidelines.</p> | <p>TII should be a party to the preparation of the Joint Retail Study for the Metropolitan Area having regard to the requirements of the DOELG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as it relates to retail.</p> |
| 1.163 | <p>With reference to the details highlighted in Amendments 1.11, 1.144 and other amendments above, planning authorities such as Cork City Council must in Sections 2.4 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities.</p> <p>However, in this instance the planning authority has outlined the preparation of a masterplan with no details of its governance nor statutory remit at this important location for the national road network. TII considers that the approach identified in the Development Plan and Proposed Amendments to be inappropriate in lieu of a plan led approach given the nature and character of the proposals and the location which would impact the N20 and its associated junction as well the NDP M20 scheme.</p> <p>The Council is also reminded that Section 2.7 Development at National Road Interchanges or Junctions , DOELG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires 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.</p> <p>They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.</p> <p>TII again would highlight that an appropriate evidence-based approach as outlined in the planning policy above has not been demonstrated by the Cork City Strategic Employment Locations Study nor the development plan especially with respect to these lands at Blarney.</p> | <p>TII advise that for lands facilitated by this amendment require an evidence base in accordance with Sections 2.4 ,2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities .Therefore TII consider that this objective and associated zoning location is premature.</p> <p>TII recommends that this objective and associated zoning should be omitted until such time as the statutory evidence base has been developed in accordance with statutory guidance outlined and the protection of the safety efficiency of the existing N20. In addition, the omission of the zoning at this stage will avoid the potential to make NDP road projects such as the M20 , uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme.</p> |

TII also advise that Section 2.9 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires the Protection of Alignments for Future National Road Projects.

This section details 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. Inappropriate zonings are contrary to the broader public interest concerning the achievement of value for money for the taxpayer and can significantly increase the cost of land to be acquired for national road schemes. Such zoning decisions could make the road project uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme.

In the opinion of the Authority, these matters have not been considered appropriately with respect to proposed new employment zonings and objectives with the critically important M20 scheme

TII advise that the evidence base required in accordance with Sections 2.4, 2.7 and 2.9 DOELG Spatial Planning and National Road Guidelines for Planning Authorities has not been demonstrated in relation to impact on national road with respect to lands at Blarney, "where there is market demand for a location alongside the strategic road network." In this regard these zoning locations should be omitted until such time as the evidence base has been developed in accordance with statutory guidance outlined.

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|--|
| 1.227 | <p>For Retail Warehousing, TII refers to National policy related to national roads included in National Planning Framework (page 140 refers) and the National Development Plan 2018-2027 to maintain the capacity and safety related to national roads including planning for future capacity enhancement.</p> <ul style="list-style-type: none"> i. The requirement in 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. ii. The existing known constraints on capacity and safety of the national road infrastructure within Cork. iii. The absence of the Joint Retail Study for the Metropolitan Area. | <p>TII recommends that this amendment is altered to ensure that the requirement of Section 4.11.4 of the Retail Planning Guidelines, 2012 and the protection of strategic national road network are achieved.</p> |
| 1.299 | <p>TII notes and welcomes the extra details of amendment 1.299 . However, regarding the Eastern Access, TII would again highlight that Section 13 of the Cork Metropolitan Transport Strategy indicates:</p> <p><i>“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 Ringskiddy. 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.”</i></p> <p>TII remains of the opinion that the eastern N8 Dunkettle Access indicated on Figure 10.31 in the Draft Development Plan 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 will need to be undertaken as indicated in this amendment.</p> | <p>TII remains of the opinion that the eastern N8 Dunkettle Access indicated on Figure 10.31 in the Draft Development Plan will impact adversely on the Dunkettle Interchange Upgrade Scheme.</p> <p>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 will need to be undertaken as indicated in this amendment as detailed in Section 13 of the Cork Metropolitan Transport Strategy.</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|---|
| 1.304. | <p>TII notes the alteration of the objective for these greenfield outer suburban lands which formed part of uncompleted Proposed Amendment No 1 to the Cork County Council's Ballincollig/Carrigaline MD Local Area Plan 2017. TII consider that the amendment does not resolve the serious concerns raised by TII.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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:</p> | <p>TII strongly recommends that this zoning and objective are omitted until such as an appropriate traffic and transportation analysis for the locality is prepared by the City Council with consultation and agreement with the NTA and TII. This will ensure an understanding of the impacts at this location on the M28/N28 mainline and its interchange, with existing, permitted and planned development, the role of the N28 within the EU Core TEN-T network. Such an approach 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 prior to submission of any planning application. This analysis will also need to be complementary to the provision of appropriate sustainable transport development and the delivery of CMATS.</p> |

| | | |
|--|--|--|
| | <p><i>“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”.</i></p> <p>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 these significant transport mitigation matters at development management stage is inappropriate and unacceptable, given the location of the lands in proximity to the N28, national road, part of the EU TEN-T Core Network and also subject to considerable potential exchequer investment in the M28 and the function of N/M28 route in facilitating strategic traffic.</p> <p>In TII’s opinion, the proposed zoning and this objective 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.</p> | |
|--|--|--|

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|---|
| 1.305. | <p>As already highlighted throughout this document, TII notes with concern the non-statutory basis for preparation of framework plans and also that development proposals will be considered prior to the framework plan being prepared.</p> <p>TII would highlight that the N27 and N40 are part of the EU TEN-T Core network. TII's opinion is that there needs to a statutory planning framework created in this area which will seek to prepare an evidence-based plan led and coordinated approach to development in this regeneration area which will also demonstrate that the proposed development will not have a detrimental impact on the capacity, safety, or operational efficiency of the national road network in the vicinity and to protect the exchequer investment already and being made.</p> <p>These matters are required under the statutory Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012), the role of the EU TEN_T Core network, National Strategic Outcome 2 of the National Planning Framework, nor Chapter 13 Cork Metropolitan Area Transport Strategy.</p> <p>As already highlighted, TII is of the opinion that where such Frameworks 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 incorporate them in the development plan or local area plan on a statutory basis.</p> | <p>Where Frameworks, Development Brief or Masterplans proposals impact the strategic national road network, in this instance the N40 and N27. TII considers the approach currently identified in the Development Plan and Proposed Amendments to be inappropriate in lieu of a plan led approach given the nature and character of the locations concerned.</p> <p>Accordingly, TII suggests the following wording in red for the Councils consideration in this amendment.</p> <p>“10.336 This Framework Plan will cover two strategic landbanks either side of the N40. Study Area 1 encompassing lands from the junction of the N27 and Forge Hill / R851 to the Kinsale Road Roundabout on both sides of the N27. Study Area 2 will include the greater Kinsale Road area from the Kinsale Road Roundabout north to the junction with the Tramore Road. The Framework Plan will be prepared by the City Council in consultation with relevant stakeholders and will form the basis for a future Variation to the Draft Development Plan. Particular attention will focus on:</p> <ol style="list-style-type: none"> 1. Requirements of CMAATS 2. Rationalisation of accesses on the N27 3. Promotion of sustainable transport 4. The brownfield site on the southern side of the N27 and the former Sisk site and compound. 5. Site no 5 South Link Road <p>The scale, mix and form of development in this area and its associated infrastructure will need to be designed to successfully integrate with the existing and emerging local neighbourhood airport, transport requirements and role for the wider city area. ”</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|---|---|
| 1.307 | <p>TII notes the increase from 15,000 to 20,000 sqm for business and technology uses. TII advises that the constraints and strategic issues highlighted by TII in submissions associated South Mahon Local Area Plan and planning application ABP-301991-18 and 310378, with regard to the impact on the N40 and associated interchange, still remain. There are significant capacity issues which pertain to the N40 at this location</p> <p>In that regard, TII considers that zoning proposes a further intensification of development which could create an unacceptable impact on the operation, capacity, and safety of the N40 and associated interchange.</p> <p>As the Council is aware any proposal at this location will need to demonstrate that it is not at variance with national policy in relation to development set out in the DOECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012) and National Strategic Outcome 2 of the National Planning Framework, which includes the objective, <i>'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.'</i></p> <p>The Authority is specifically concerned as to the potential impact that this increase in development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, i.e., existing N40, mainline and junction. TII advises that the Council needs to undertake and demonstrate the necessary evidence base in considering this amendment and ensure mitigations are provided to protect the critical N40 junction and mainline at this location.</p> | <p>TII advises that the Council needs to undertake and demonstrate the necessary evidence base in considering adopting this amendment and ensure that mitigations are provided to protect the critical N40 junction and mainline at this location in accordance with the requirements of DOECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).</p> |
| 1.327 | <p>For retail development, TII reminds the Council that national policy related to national roads included in National Planning Framework (page 140 refers) and the National Development Plan 2018-2027 to maintain the capacity and safety related to national roads including planning for future capacity enhancement and that there requirement in 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.</p> | <p>TII advises that Amendment no 1.327 should refer to other strategic issues such transport which need to be considered.</p> |

| Amendment Reference no | TII Observation | TII Recommendation |
|------------------------|--|---|
| 1.344 | <p>As already highlighted under amendment 1.11 and other relevant amendments above such as 1.305., TII notes with concern the non-statutory basis for preparation of framework plans and also that development proposals will be considered prior to the framework plan being prepared. TII would highlight that the N27 and N40 are part of the EU TEN-T Core network.</p> <p>TII's primary concerns relates 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 national roads network as required by the statutory Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January, 2012), the role of the EU TEN_T Core network, National Strategic Outcome 2 of the National Planning Framework, nor Chapter 13 Cork Metropolitan Area Transport Strategy.</p> <p>TII's opinion is that there needs to a statutory planning framework created in this area which will seek to prepare an evidence-based plan led and coordinated approach to development in this regeneration area which will also demonstrate that the proposed development will not have a detrimental impact on the capacity, safety, or operational efficiency of the national road network in the vicinity and the exchequer investment already made.</p> <p>As already highlighted TII is of the opinion that where such Frameworks 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 incorporate them in the development plan or local area plan on a statutory basis.</p> | <p>TII recommend that this amendment should be amended as follows:</p> <p>This land use zone includes the Tivoli dockland area, which is identified in the National Planning Framework as a nationally and regionally significant development area and a key future growth enabler for Cork. This land use zone includes the two study areas identified at the Airport City Gateway. These study areas will be the subject of Framework Plans to be prepared by the City Council in consultation with relevant stakeholders and will form the basis for a future Variation to the Draft Development Plan.</p> |

TII Observations Cork City Council: Part 2 Material Amendments to Volume 2 Mapped Objectives

| Amendment Reference no | TII observation | TII Recommendation |
|------------------------|---|--|
| 2.3 | <p>TII advises that national roads can potentially produce significant impacts that extend beyond the roads concerned, such as, drainage, traffic noise and vibration; vehicle generated emissions; lighting/glare; dust and non-point source pollution e.g., storm water run-off, spray-drift, and litter; and visual impact. These are factors which the planning authority need to be aware of in this area.</p> <p>The Planning Authority should consult Chapter 3 of DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012 with regard to development locations in proximity to existing and proposed national road infrastructure.</p> | <p>TII advises, in this instance, that the amendment acknowledges that any development adjacent to N40 will be required to address, potential impacts arising from the existing national roads and planned improvements at the developers cost. This could include mitigating impacts through appropriate design of buildings, landscaping features and site layout as part of the development proposal.</p> |
| 2.34 | <p>TII advises that the planning authority should be aware of the requirements associated with</p> <ol style="list-style-type: none"> 1. under Cork County Council Planning Permission ref., no S/07/9803 and 2. Section 2.7 of the DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012. | <p>TII advises that the planning authority should be aware of the requirements associated with Section 2.7 of the DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012</p> |
| 2.41 | <p>TII advises that the planning authority should be aware of the requirements associated with Section 2.7 of the DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012 and ensure no detrimental impact on the national road junction.</p> | <p>TII advises that the planning authority should be aware of the requirements associated with Section 2.7 of the DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012 and ensure no detrimental impact on the national road junction.</p> |

| Amendment Reference no | TII observation | TII Recommendation |
|------------------------|--|---|
| 2.47 | <p>With reference to the details highlighted in Amendments 1.11, and 1.144 above, Planning authorities such as Cork City Council must in Sections 2.4, 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities.</p> <p>However, in this instance the planning authority has outlined the preparation of a masterplan with no details of its governance nor statutory remit at this important location for the national road network.. TII considers that the approach identified in the Development Plan and Proposed Amendment to be inappropriate in lieu of a plan led approach given the nature and character of the proposals and the location which would impact the M8 and its associated junction as well the NDP Cork Northern Transport Project (N40)</p> <p>The Council is also reminded that Section 2.7 Development at National Road Interchanges or Junctions, DOELG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires 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.</p> <p>They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.</p> <p>TII again would highlight that an appropriate evidence-based approach as outlined in the planning policy above has not been demonstrated by the Cork City Strategic Employment Locations Study nor the development plan especially with respect to these lands at Glanmire.</p> | <p>TII advise that for lands facilitated by this amendment, an evidence base required in accordance with Sections 2.4, 2.7 and 2.9 of DOELG Spatial Planning and National Road Guidelines for Planning Authorities has not been demonstrated.</p> <p>TII considers that this zoning location and associated objectives is premature and recommends that it be omitted until such time as the statutory evidence base has been developed in accordance with statutory guidance outlined. In addition, the omission of the zoning at this stage will avoid the potential to undermine existing capacity, safety and efficiency of the existing national road network, and to make NDP road projects such as the Cork Northern Transport Project, uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme as well as the existing network.</p> |

| | | |
|---|--|--|
| <p>TII also advise that Section 2.9 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires the Protection of Alignments for Future National Road Projects. This section details 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. Inappropriate zonings are contrary to the broader public interest concerning the achievement of value for money for the taxpayer and can significantly increase the cost of land to be acquired for national road schemes. Such zoning decisions could make the road project uneconomic, potentially leading to significant material alterations to the project or even the abandonment of the scheme as well as negating the planning work undertaken and the investment made in the proposed road scheme.</p> <p>In the opinion of the Authority, the development plan and the Cork City Strategic Employment Locations Study with respect to lands at Glanmire do not provide the evidence base required under Sections 2.4, 2.7 and 2.9 DoECLG Spatial Planning and National Road Guidelines for Planning Authorities in relation to impact on existing and proposed national roads and necessary mitigations .</p> <p>In this regard these zoning locations should be omitted until such time as the requirements and evidence base has been developed in accordance with statutory guidance outlined.</p> | | |
|---|--|--|