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Mr. Kevin McGettigan
Executive Office
An Coimisiún Pleanála
64 Marlborough St
Rotunda
Dublin 1
D01 V902

Our Ref: P23-268/RD/KB

19 March 2026

Re: Submission on Observations received in relation to Planning Case Reference PA28.323930

Dear Kevin,

We thank you for forwarding details of 3 no. observations received in relation to this planning application and for inviting a submission on these observations. Please find our responses to these observations below.

Response to Uisce Éireann Observation

A Water Supply and Wastewater Connection Agreement for the proposed facility will be made with Uisce Éireann in advance of commencements of operations at the facility.

Consent for the wastewater discharge from the facility will be obtained from Uisce Éireann through the EPA Industrial Emissions licence application process in accordance with Section 99E of the EPA Act (as amended).

In order to assess the feasibility of connection to public water and wastewater infrastructure, the Applicant has prepared a Pre-Connection Enquiry (PCE) Form. This will be submitted to Uisce Éireann by Friday the 3rd of April. The average timeline from submission of PCE to issuing of a Confirmation of Feasibility (CoF) from Uisce Éireann is 16 weeks.

Response to EPA Observation

An Industrial Emissions Licence is required for the proposed facility. This IE Licence is in the process of being prepared and will be submitted to the EPA in May of this year. We note that matters pertaining to emissions will be regularised and controlled under this IE Licence.

Response to Transport Infrastructure of Ireland Observation

A comprehensive response to Transport Infrastructure of Ireland's observation in relation to the planning application has been prepared by the traffic and transport consultant on the project, TrafficWise. This response is enclosed with this letter.



If you should require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in cursive script, reading "Richard Deeney", is written over a horizontal line.

Richard Deeney
for and on behalf of **Fehily Timoney and Company**

Encl



The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Our Ref: 03225/LO/0603/JK

09 March 2026

Dear Sir

PROPOSED DEVELOPMENT WILL COMPRISE THE INSTALLATION AND OPERATION OF A HEALTHCARE WASTE TREATMENT AND TRANSFER FACILITY BLOCK 8003, BLARNEY BUSINESS PARK, SHEAN UPPER, BLARNEY, COUNTY CORK

Location of Development: Block 8003, Blarney Business Park, Shean Upper,
Blarney, County Cork

Case Reference No.: ACP-323930-25

FIRST PARTY RESPONSE TO SUBMISSION

1 INTRODUCTION

1.1 Trafficwise Ltd. is a firm of consulting engineers specialising in Traffic and Transportation Planning and Geometric Roads Design. We act for **SRCL Ltd.** in this matter. We prepared Chapter 14 'Traffic and Transportation' of the EIAR (Volume 2 – Main Body).

1.2 We have reviewed the submission of made in respect of the proposed installation and operation of a Healthcare Waste Treatment and Transfer Facility at an existing commercial building in Blarney Business Park, Co. Cork by Transport Infrastructure Ireland (TII) and have addressed the issues raised therein in this letter response.

2 RESPONSE TO TII SUBMISSION

- 2.1 The observation submitted by TII raises concerns in relation to the potential intensification of an existing access to the N20 national road and the interaction of the proposed development with the future N/M20 Cork–Limerick road scheme and associated transport infrastructure. Having regard to the analysis presented in Chapter 14 of the EIAR, these concerns do not arise in practice and appear to overlook the fundamental planning context of the site.
- 2.2 The application does not relate to the establishment of a new industrial building or a greenfield development generating entirely new traffic. The site already contains a substantial purpose-built industrial unit which was previously granted planning permission¹ for use as a warehouse or industrial facility but which has never been occupied. That permitted use establishes the baseline planning position of the site and represents the level of development that could lawfully occur without any further planning permission. Any assessment of traffic impact must therefore consider the potential traffic generation associated with that permitted development.
- 2.3 The EIAR addresses this matter explicitly. Using the TRICS database, the potential traffic generation associated with the permitted warehouse and industrial uses of the building was examined². Those permitted uses would be capable of generating between approximately 38 and 105 employee vehicle trips³ per day together with approximately 16–18 heavy goods vehicle movements. By comparison, the proposed healthcare waste treatment and transfer facility is forecast⁴ to generate approximately 28 employee car trips per day and approximately 30 HGV trips.
- 2.4 While the proposed use has the potential to result in a modest change in the balance between staff vehicles and HGVs, the overall scale of traffic associated with the building remains broadly comparable with that which could arise under the permitted use. Critically, the proposed development generates extremely low levels of traffic⁵ during the commuter peak periods when the capacity of the national road network is most sensitive. In practical planning terms, the occupation of the building for the proposed use can therefore reasonably be regarded as traffic neutral when compared with the existing permitted development.

¹ Planning Reg. Refs. 19/38874, 20/39681 and 21/40509

² EIAR Section 14.11.3.1 'Estimated Trip Attraction – Existing Permitted Development' see also Tables 14-7, 14-8

³ Trip is constituted of one vehicle movement in and one out (i.e. staff trip, morning inbound, evening outbound).

⁴ EIAR Section 14.11.3.2 'Estimated Trip Attraction – Proposed Development' see also Table 14-11

⁵ EIAR Table 14-11. Proposed development forecast to generate no traffic in AM peak and 2 HGV trips in the PM peak

- 2.5 The EIAR traffic assessment nonetheless adopts an intentionally conservative approach. In order to provide a robust and transparent assessment, the traffic analysis does not rely solely on the permitted development baseline but instead examines the development as if it were a completely new greenfield development generating entirely new traffic on the road network. Even under this deliberately conservative scenario the results demonstrate that the traffic impact of the development is extremely small in the context of the N20 receiving environment.
- 2.6 TII recorded two-way peak hour traffic flows on the N20 in May 2025 in the vicinity of the site are in the order of approximately 2,000⁶ vehicles. The proposed development is forecast to generate no traffic in the identified morning commuter peak hour and approximately 2 HGV arrivals and 2 HGV departures in the evening peak hour. This equates to approximately four two-way vehicle movements within a evening peak hour traffic stream of around 2,000 vehicles, representing an increase of approximately 0.2%. This level of traffic increase is extremely small by any standard of traffic engineering assessment.
- 2.7 The EIAR has regard to TII's own Traffic and Transport Assessment Guidelines⁷ that identify threshold levels that typically trigger the need for detailed assessment where development traffic exceeds 10% of traffic flows on the adjoining road, or 5% in sensitive or congested locations. The forecast impact of the development is therefore not merely below the relevant threshold but many multiples below it. Indeed, the predicted maximum peak hour impact of approximately 0.2% is around twenty-five times lower than the lower 5% threshold and approximately fifty times lower than the standard 10% reference value. Even when assessed as a greenfield development, the proposal therefore produces a traffic impact on the receiving N20 that is clearly negligible.
- 2.8 Against this background, the suggestion that the proposal represents a material intensification of access to the N20 is difficult to sustain. The access in question serves the entire Blarney Business Park and was designed to facilitate industrial and commercial development within that estate. The proposed development represents the occupation of a single existing building within the park and does not materially alter the function of the access or the character of traffic using it. The assessments in the EAIR have regard to the TII published forecast growth rates⁸ in traffic on the N20 and associated receiving road network, standard to traffic assessments.

⁶ EIAR Table 14-2 and 14-3 average two-way flow for Link 1 and Link 11 in both morning and evening approx. 2,000

⁷ TII Publication PE-PDV-02045 'Traffic and Transport Assessment Guidelines' (May 2014).

⁸ TII PE-PAG-02017 'Project Appraisal Guidelines for National Roads Unit 5.3 Travel Demand Projections' (Oct 2021).

- 2.9 Furthermore, the concerns expressed by TII regarding the potential interaction with the future N/M20 Cork–Limerick project appear to overlook the fact that the building already exists and has an established permitted use capable of generating traffic. When TII and the project promoters were developing route options, traffic forecasts and scheme designs for the N/M20 project, it would have been necessary to consider the existing land use context and the potential traffic generation associated with zoned and permitted development in the surrounding area. The building at Blarney Business Park forms part of that existing planning baseline. In other words, the traffic that could arise from the occupation of this building is something that should already be inherent within the traffic modelling and planning assumptions underpinning the national road project.
- 2.10 It follows that the proposed development does not introduce a new or unforeseen traffic demand into the network but simply represents the occupation of a building that has long had the capacity to generate industrial traffic. To the extent that the national road scheme has been planned having regard to the surrounding industrial development lands and permitted buildings, the traffic associated with this unit should already be implicitly accounted for within those planning assumptions.
- 2.11 In any event, the extremely small level of traffic associated with the proposed development makes it clear that the proposal cannot realistically prejudice the delivery, operation or cost of a major national road project such as the N/M20 Cork–Limerick scheme. The difference between the traffic generated by the proposed use and the traffic that could arise from the permitted use is minute in the context of the scale of traffic flows carried by the national road network.
- 2.12 For these reasons the EIAR concludes, and the evidence clearly demonstrates, that the proposed development will not adversely affect the safety, capacity or operational efficiency of the national road network. It follows as reasonable to conclude that it similarly does not have the potential to prejudice the future delivery of strategic transport infrastructure projects in the area.
- 2.13 The proposal represents the reasonable and appropriate occupation of an existing permitted industrial building within an established business park and generates traffic levels that are demonstrably negligible in the context of the surrounding road network.

- 2.14 The submission by TII also refers to the policy set out in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, January 2012) which seeks to avoid the creation of new accesses to national roads where speed limits exceed 60 km/h and, similarly, to avoid the intensification of traffic movements at existing accesses. It is respectfully submitted that neither circumstance arises in the present case. The proposed development does not involve the creation of any new access to the national road network; rather it relates solely to the occupation of an existing building within an established business park served by an existing estate access. Furthermore, having regard to the planning history of the site and the permitted warehouse/industrial use of the building, the proposal does not represent a material intensification of that access. The building already has the benefit of planning permission for uses capable of generating broadly comparable traffic levels and therefore the traffic associated with the occupation of the building must be regarded as inherent to the established planning baseline. In these circumstances the proposal does not offend the policy objectives of the Spatial Planning and National Roads Guidelines in relation to either new accesses or the intensification of existing accesses to national roads.
- 2.15 The submission by TII also refers to the proposed Park-and-Ride facility associated with the planned Blarney / Stoneview railway station. It is understood that this proposal forms part of the Cork Area Commuter Rail Programme and is currently at an early, non-statutory stage of project development. The scheme has not progressed to Railway Order application stage and no detailed design, traffic modelling or traffic generation data has been published that would allow a meaningful assessment of its interaction with the national road network. In the absence of sufficient design detail or quantified traffic forecasts, it is not possible to incorporate the proposed Park-and-Ride facility within the cumulative traffic assessment undertaken in the EIAR. Notwithstanding this, the extremely small level of traffic associated with the proposed development, as demonstrated in Chapter 14 of the EIAR, makes it clear that the proposal would not have the potential to materially interact with or prejudice the future delivery or operation of such strategic transport infrastructure.

3 CONCLUSION

- 3.1 The concerns raised by TII do not withstand scrutiny when considered in the proper planning context of the site. The proposal does not introduce a new traffic generating development onto the national road network, rather it represents the occupation of an existing industrial building which already benefits from planning permission for uses capable of generating broadly comparable levels of traffic. In that regard the traffic associated with the building must be regarded as part of the established planning baseline and, by extension, part of the traffic environment which the promoters of the N/M20 Cork–Limerick project will already have been required to consider in developing their scheme design and traffic forecasts.
- 3.2 Even if that baseline position is set aside, the EIAR deliberately assesses the proposal as if it were a greenfield development generating entirely new traffic. The results of that conservative analysis demonstrate that the development would add very few vehicles to peak hour flows on the N20, equating to approximately 0.2% of existing traffic. This is not merely below the thresholds identified in the TII Traffic and Transport Assessment Guidelines but many multiples (25-50 times) below them. In practical terms, the proposal would have no discernible effect on the operation, capacity or safety of the national road network. On any reasonable interpretation of the available evidence, the development cannot be said to compromise either the existing road network or the future delivery of the N/M20 project, and the objection raised by TII should therefore be afforded limited weight in the Commission's consideration of the application.

Yours sincerely



Julian Keenan
for **Traffic**wise Ltd.