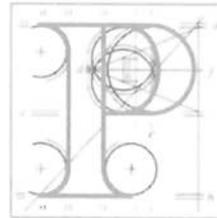


Our Case Number: ACP-323930-25



An
Coimisiún
Pleanála

Transport Infrastructure Ireland
C/O Tara Spain, Land Use Planning Unit
Parkgate Business centre
Parkgate Street
Dublin 8

Date: 16 January 2026

Re: 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

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA09

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

From: Landuse Planning <LandUsePlanning@tii.ie>

Sent: Friday 9 January 2026 15:46

To: SIDS <sids@pleanala.ie>

Subject: TII25-134413 - ACP-PA28.323930 Healthcare Waste Treatment and Transfer Facility Blarney Business Park, County Cork

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To whom it may concern

Please see the attached observation in relation to ACP-PA28.323930 Healthcare Waste Treatment and Transfer Facility Blarney Business Park, County Cork.

TII would appreciate an acknowledgement.

Regards

Tara

Tara Spain

Head of Land Use Planning .

Transport Infrastructure Ireland.

Email: LandUsePlanning@tii.ie



I am a Designated Public Official under the Regulation of Lobbying Act 2015, for more information see www.lobbying.ie

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An Coimisiún Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1

By email: sids@pleanala.ie

Dáta | Date

9 January 2026

Ár dTag | Our Ref.

TII25-134413

Bhur dTag | Your Ref.

ACP-PA28.323930

RE: Healthcare Waste Treatment and Transfer Facility Blarney Business Park, County Cork ACP Reference no PA28.323930.

Dear Sir /Madam,

I refer to the correspondence received in relation to the above planning application and would request that the Board consider the following:

Based on review of the available online planning documentation, TII advises as follows:

- The proposal is facilitated by a private access direct to the N20 (i.e. non-public road) where a 100kmph speed limit applies. For clarity, the Blarney Business Park access to the N20 and associated road network is not a public road.

Official policy in relation to development involving access to national roads and development along such roads is set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012). Section 2.5 of the Guidelines states that the policy of the planning authority will be to avoid the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kph apply. Based on the material available including omissions related to traffic and transport matters TII is of the opinion that the proposal if approved, would result in the intensification of an existing direct access to a national road contrary to official policy in relation to control of frontage development on national roads.

- The existing privately owned N20 access which facilitates the proposal is located within an area currently under consideration of a notified and publicly available route option for the N/M20 Cork to Limerick Project national road improvement scheme.

For clarity the N/M20 Cork to Limerick Project is a key element in Project Ireland 2040, the Government's long-term overarching strategy to make Ireland a better country for all of its people. Limerick City and County Council, in partnership with Cork County Council, Cork City Council, Transport Infrastructure Ireland (TII) and the Department of Transport (are developing the N/M20 Cork to Limerick Project.

In June 2025 , Limerick City and County Council, published the "N/M20 Cork to Limerick – Public Update June 2025" This update provides detailed, specific information on the layout and functioning of the project. It also provides an indication of the lands anticipated to be required by the project which at this stage covers lands that are needed on a temporary and permanent basis.

For the Blarney Business Park area, the Update highlights the significant changes in road layout which will be undertaken. These are not reflected in the planning documentation. TII advises that the specific function and road layout of the junction has repercussions for traffic and transport for the planning application proposal at various stages of its delivery and operation. More importantly the Update illustrates the altered public road network which shall exist when



the M20 project is delivered. These matters have not been considered and addressed by the applicant's assessments which accompanies the planning application.

TII would highlight that the "N/M20 Cork to Limerick – Public Update June 2025" with its detailed plans for the applicants' assessments was available during the period of preparation of the EIAR and planning documentation.

For the Commission's consideration there is increased certainty with respect to the project's progression, the Government's National Development Plan Review 2025 Securing Ireland's Future Sectoral Investment Plan: Transport outlines that N/M20 Cork to Limerick will be procured by 2029 and constructed post 2030. "List of Major National Roads Projects (>€200m) Scheduled to Commence Construction / Procurement by 2030" refers.

TII would remind the Commission that TII that Section 2.9 of Spatial Planning and National Roads: Guidelines for Planning Authorities indicates that 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.

The Commission should also be aware that inappropriate planning decisions by planning authorities at this stage of planning and design of N/M20 Cork to Limerick Project 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 Exchequer investment already made in the proposed road scheme. TII advises that any future costs as a result of decisions made by the planning authority which adversely impact a scheme shall also potentially have to be borne by the local authority concerned.

TII highlights that Cork City Council Development Plan 2022-2028 policies and objectives associated with the national road network in particular Objective 4.6 Corridor & Route Selection Process Objective 4.7 Protection of National Roads and Objective 4.8 Mitigation of Adverse Impacts on Strategic Roads exist as does the existence of the scheme in Cork Metropolitan Transport Strategy and Regional Spatial & Economic Strategy for the Southern Region 2020-2032.

TII advises with concern that the applicant has not taken account of the current scheme updates with proposed future road layout and associated impacts. These matters have significant implications for not only the proposed development, its delivery, operation and also critically the future public road network. Consequently, TII considers no appropriate actions to address and ensure it safeguards the N/M20 Cork to Limerick Project have been identified.

Due to these issues, TII considers a decision to grant based on the application in its current form would be contrary to the broader public interest concerning the achievement of value for money for the taxpayer and could significantly increase the cost for national road schemes. Hence in TII considers in absence of these required assessments related to the N/M20 Cork to Limerick Project a decision by the Commission would be premature.

- Related to both the existing privately operated access to the N20 and future access to a new public road layout post the delivery of the M20, the Government National Development Plan Review 2025 Securing Ireland's Future Sectoral Investment Plan: Transport also indicates that the Cork Area Commuter Rail Project will be procured between 2026-2027 with a construction timeline between 2026-2030+. TII advises that the public consultation exercise was undertaken by Irish Rail was during the Summer of 2025 during the period prior to submission of this application. Again, this consultation exercise was undertaken during the period of preparation of the EIAR and planning application documentation.

TII considers that omission of the specific details associated with the planned requirement for Strategic Park & Ride facilities to be provided at Blarney/Stoneview station and its access to the same privately operated direct access to the N20 is a considerable oversight on behalf of the applicant. This Park & Ride will have a very specific traffic profile, catchment and use which will impact the traffic management of the current application proposal. TII considers, scale and character Strategic Park & Ride facilities has not been considered appropriately in the application documents. This is especially apparent in cumulative impact in the traffic and transport assessment accompanying the submitted EIAR and planning documentation.

- Finally, it is observed that Chapter 6 , Scoping and Consultation of the EIAR indicates that the applicant undertook scoping consultation with TII. TII has no record of consultation by the applicant in relation to EIAR scoping nor its agent nor Cork City Council nor the Commission. If consultation had taken place TII would have highlighted that the above would need to be addressed in the EIAR.

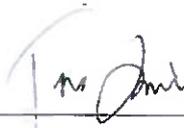
absence of TII's involvement , it would have been expected that Cork City Council as the planning and roads authority for this area would have raised matters to the national road access, the MN20 project and the Cork Area Commuter Rail (CACR) Programme. It would have been expected that the applicant would have been made aware of these projects, especially given the significant changes required associated with the "N20 Access" both in terms of volume and nature of traffic and also the significant road layout changes within this area.

In summary the Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development has considered and evaluated the requirements of official policies related to the national road network to demonstrate that it will not have a detrimental impact on the capacity, safety or operational efficiency and the investments to be made of both the existing and future national road network in the vicinity of the site.

TII advises that the matters raised in this submission require resolution prior to a decision being made on this application . TII advises it would expect that the planning and roads authority Cork City Council would be best placed to assist the applicant, TII and the Commission on these matters .

Please acknowledge receipt of this submission.

Yours faithfully,



Head of Land Use Planning