

CUNNANE STRATTON REYNOLDS

***Submission to Draft Cork City Development Plan 2022-2028
In respect of Lands at Garranedarragh, Bishopstown, Cork***

**On behalf of
Kathleen O'Mahony**

by

Cunnane Stratton Reynolds

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Table of Contents

1.0	Introduction	3
2.0	Executive Summary	3
3.0	The Subject Site for which Rezoning is Sought	6
4.0	Location and Development Context.....	8
5.0	National Planning Policy and Guidance	9
6.0	Regional Planning Policy and Guidance	13
7.0	Local Planning Policy	16
8.0	Draft Cork City Development Plan 2022-2028	19
9.0	Our Client's Case for the Residential Zoning of their Site.....	23
9.1	Need.....	34
9.2	Policy Context	35
9.3	Capacity of Water, Drainage and Roads Infrastructure	39
9.4	Supporting Infrastructure and Facilities.....	43
9.6	Adherence to the Sequential Approach.....	44
9.7	Environmental and Heritage Policy.....	44
9.8	The Significance of the Greenway	44
10.0	Conclusion.....	47

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1.0 Introduction

This submission to the Draft Cork City Development Plan 2022-2028 has been prepared by Cunnane Stratton Reynolds Ltd in accordance with Section 12(2)(b) of the Planning and Development Act 2000, as amended.

This submission is made on behalf of our client, Kathleen O'Mahony, in respect of her lands at Garranedarragh Cork which form part of Cork City administrative area following the 2019 extension to the city boundary.

Please note below that all underlining is ours for emphasis.

2.0 Executive Summary

Our client seeks to have her land at Garranedarragh and identified below zoned for new residential development.

This submission requests that 14ha is zoned for residential development in the Cork City Development Plan 2022-2028 from its current zoning as Metropolitan Greenbelt. Our client's land is suitable for residential development and should be rezoned for the following reasons:

1. **There is an acute need for residential development within the city area.**
2. **There is significant demand for housing; we are deep into a housing crisis, yet housing completions in Cork City are no greater than what they were in the early to mid 1970s (City Council's own figures).**
3. **The Draft Cork Joint Housing Strategy and Housing Need Demand Assessment notes that the current property market cycle has been marked by a supply/demand mismatch. Under-supply has become a serious issue, particularly in key urban areas.**
4. **Targets contained in the National Planning Framework, the Southern Regional Spatial and Economic Strategy, as well as very ambitious plans for sustainable transport and public transport infrastructure set out in the recently adopted Cork Metropolitan Area Transportation Strategy 2040 (CMATS) cannot be realized, including the southern distributor road, which is a key strategic objective for that regional (we emphasise) transport strategy, without development in this location.**
5. **There is a Part 8 planning permission for access off the N71 into our client's site.**
6. **The provision of access to our client's site, which will only happen if it is rezoned, will enhance the feasibility of development on the NAMA/Castlelands site. The existing zoning to the north and north west in this location requires the delivery of roads infrastructure that development from this requested zoning will assist deliver (ie our client can provide access for both our client's and the NAMA/Castlelands zoned lands) and potentially to the south and south east also.**
7. **If the southern environs is not developed much needed infrastructure for the existing population in this area by way of roads, public transport, sanitary services and enhanced access to the airport from the city will not be achieved nor will the long proposed and supported southern distributor road (SDR). There is therefore a consequential large swathe of potential development land stretching from the Bandon Road to the N27 Airport Road along with enhanced access to the airport (which is important for the City given its international aspirations to be a significant player on the global stage advocated in the Draft Plan).**

8. Rezoning specifically facilitates a potential link road to the N27 Airport Road via Spur Hill and Lehenaghmore (a portion of which is the strategic public transport corridor designated as the Southern Orbital as outlined in CMATS). The link road, on its completion, would be an alternative route to the airport with the potential to alleviate some of the existing chronic traffic congestion at the Kinsale Road Roundabout Interchange during peak periods. The enhancement of access to the airport has been talked about for many years but not been delivered.
9. If the City Council do not want to open up the southern environs to development contiguous to existing development and want to resist the provision of additional roads we would ask that you carefully consider the access to and from the greenway as a means of reducing dependence on the car and promoting carbon neutral, active and health forms of transport. The subject site straddles the former rail line and no undeveloped site has better access to the greenway than our client's.
10. The site has the potential to be served by the proposed 'Greenway' on the old Bandon Road Railway Line which uniquely runs either side of our client's lands and which continues eastwards towards the Tramore Road within the confines of the extended city boundary. With the development of the zoned lands to the north of the subject site, pedestrian and cycle access to Dunnes Stores and to the N40 Cycle/Footpath network will be available. Pedestrian /cycle access to the adjoining residential estate to the west 'Eagle Valley' will also be provided. This is in accordance with CMATS which identifies the provision of this greenway as a key objective for the city. What more unique an amenity and attraction for both residents and tourists in Cork to provide sustainable and healthy pedestrian and cycle means of access could there be than to reopen the rail line for such purposes?
11. The proposed reuse of the abandoned rail line for pedestrian and cycle access is welcomed by our client and is consistent with not only Objective CL-U-13 of the adopted Ballincollig Carrigaline MD LAP 2017 but is also consistent with the Cork City Cycle Network Plan. This amenity would provide a strong and central cycle and pedestrian spine through development in the southern environs as envisaged in national and regional planning policy and guidance.
12. Population projections backload most significant population growth to the latter end of the period to 2040 meaning that housing is denied to significant numbers.
13. The City Council has decided to provide 65% of its future population growth in existing urban areas rather than the stipulated minimum of 50% set out in the NPF National Policy Objective 3b. This will severely constrain housing choice. The docklands is to receive a population increase of 364% as per Core Strategy population projections over the 6 year plan period. Whilst a significant increase in the dockland area is welcomed it should not be at the expense of reasonable and sustainable allocations elsewhere. Not everyone wants to live in an apartment and not everyone wants to live in the city centre, the docklands or in highly densified designated centres.
14. The environs are largely ignored for new housing and the southern environs and the Bishopstown area in particular. A young population is located in the vicinity of the subject site, in Bishopstown and Wilton, and growth is greater than in other areas of the city.

15. Bishopstown, was once and still is a thriving suburb of Cork City and should remain so and the greenway offers an unrivalled opportunity for further investment there. It should not exist in the shadow of substantial development and investment in Ballincollig. As indicated above the south west environs is particularly under-represented in population projections for the city.
16. These lands would be categorised as Tier 2 land in accordance with the NPF and provide an opportunity to deliver a consolidated residential development close to Bishopstown and the local centre.
17. If the City Council are true to the 15 minute city concept then they should consider the attractiveness of this site for rezoning as a planning priority given the proximity of University College Cork, Cork University Hospital, proximity to Wilton Shopping Centre, sports and recreational facilities, existing schools – all already within 15 minutes but expected to be brought closer to this site by the Greenway.
18. Return on City Council and national exchequer investment in the greenway can be maximised by the sustainable provision of development closest to it (ie matching planning with infrastructural investment as advocated in the National Development Plan and the National Planning Framework) and the provision of healthy and sustainable means of transport consistent with national transport policy, and agreed national actions on climate change, as well as tourism in the city.
19. No justifiable planning distinction can be made between our client's land that is zoned and that land within her ownership that is not zoned. The entire area of the subject site, straddling the greenway, should be zoned in the interests of the proper planning and sustainable development of the area.
20. The residential zoning of this site is consistent with the sequential approach to land use zoning and achievement of compact growth. Maximum benefit from the greenway can only be achieved from zoning land on either side of the former rail line. Rezoning both sides of the former rail line can ensure that the greenway becomes the fulcrum and centre piece for development in this area.
21. The establishment of this greenway needs to be more prominent in the emerging plan and receives only one indirect mention and has the potential to be not just a significant piece of sustainable transport infrastructure but will also be a significant tourism asset fundamentally changing how people get about the city and in particular the southern environs. It is incomprehensible that such an important piece of transport infrastructure perfectly aligned with CMATS, consistent with national cycling policy and the Cork Walking Strategy 2013-2028, which will encourage healthy lifestyles and which likely will redefine transport in the area and give a tremendous boost to tourism in the city as it has done in Waterford is not given more prominence in the plan. This greenway needs to be front and centre of the emerging plan and given at least equal billing to 'Lee to Sea'. We suspect that the Bandon to Cork greenway is not given prominence in the emerging plan, as it was in the adopted LAP, as it will redefine not just the *transport dynamic* in this part of the city to complement the roads based transport infrastructure granted under Part 8 and the provision of the southern distributor road, but will also redefine the *development dynamic* in the southern environs. This has not been considered adequately by the Council in respect of zoning and is a material consideration when assessing preferred locations for residential zonings.
22. The designation of part of our client's site as hinterland, where there is a wholesale presumption against development, negates any potential benefit to the expansion of the city boundary as recently as 2019.

23. The Council will be aware that planning permission has been granted last month by An Bord Pleanála under their reference TA28.310274 for Ardstone Developments at Ardostig and Waterfall Road. The significance of the Board's decision is that the County Council's concerns about water supply identified in their Strategic Land Reserve Assessment in 2018 about development in this area being premature upon delivery of water supply upgrade is now considered unfounded. Similar unsubstantiated concerns were advanced by the City Council for previously resisting zoning on the subject lands and should not be advanced as reasons for resisting rezoning in this instance.

3.0 The Subject Site for which Rezoning is Sought

This site is shown in Figure 1 below.

The site, the subject of this request for zoning, comprises lands covering circa 14 hectares. Our client's ownership is outlined in red within Figure 1 below with the area the subject of this rezoning request shaded in red. The subject site straddles the abandoned Bandon Rail line the significance of which is outlined below. Some 5ha shaded are located to the south of this former rail line with a further 9ha shaded located on the northern side.

Figure 1: *The Site (with the area for rezoning hatched)*



The southern lands are relatively flat and are of sufficient width and regular dimension, along with favourable topography to be able to accommodate a relatively substantial amount of development. These southern lands comprise a single field and are in pasture.

The lands north of the former rail line comprise four fields with the westernmost field lying directly adjacent to the N71 Bandon Road.

The site the subject of this rezoning submission comprises 3 no. plots. Two of these plots are north and immediately adjoining the former Cork to Bandon Rail line. The third plot is located south of the former rail line. The rail line is vested in the ownership of Iarnród Éireann. The total area of all three plots minus what is already zoned and the area comprising this rezoning request therefore is 14ha. These plots are shown in Figure 2 below.

Plot A is the largest area of the three plots, it is relatively flat and is of sufficient width to be able to accommodate substantial development. It is triangular in shape which presents its own challenges in terms of potential layout. It is also the most elevated part of the masterplan site although it is substantially more level than either Plots B or C. Although furthest removed from the N71 this plot and is strategically located to be able to provide access to sites to the east and has potential to unlock the lands to the adjoining sites owned by Mr Sweetnam.

Plot B lies directly adjacent to the N71 Bandon Road and would gain direct access from this road. Despite its strategic location and better connectivity to the existing road network, this is the steepest part of the masterplan area and there is a significant slope at this location. Plot C along with Plot B form a continuous curved slope running in a west east direction. However, this part of the site would offer significant views over the west of the city and Bishopstown in particular if developed in an appropriate manner. This plot of land provides the feeder road onto Plot C to serve the adjoining neighbouring lands.

It is contiguous to Plot B and therefore can benefit from the direct access that Plot C potentially could benefit from. Plot C has a similar topography to Plot B but experiences a more steady or consistent change in gradient. Plot C is removed from Plot A through the former railway line. This plot through its elevated nature if developed would offer significant views over Cork City.

As indicated above, Plot C incorporates a relatively small area that is likely to be subsumed into a planning application by NAMA or alternative developer as a Large Scale Residential Development to An Bord Pleanála. Plot C is capable of providing pedestrian connectivity into the NAMA lands which would then lead into the proposed Greenway and thereafter to other parts of the city.

The disused railway line is a prominent feature of this area and offers significant opportunities for sustainable development, providing healthy and climate neutral means of transport and access that a solely road based scheme of development could not. This site and its development potential deserves special consideration for not just residential development but support amenities that can also be used by existing and prospective local residents and visitors and/or tourists.

The old rail line is a linear strip of land variable in width measuring approximately 13-17m in width and is subject to a substantial embankment on either side. There is a robust line of trees and shrubs of varying degrees of maturity on either side and it can be reasonably assumed that it is a location for existing substantial biodiversity and wildlife. This greenway is at its widest width between Plots A and B. It offers considerable opportunity for extensive pedestrian and cycle links to adjacent areas, and throughout the southern environs, both already developed and capable of being developed.

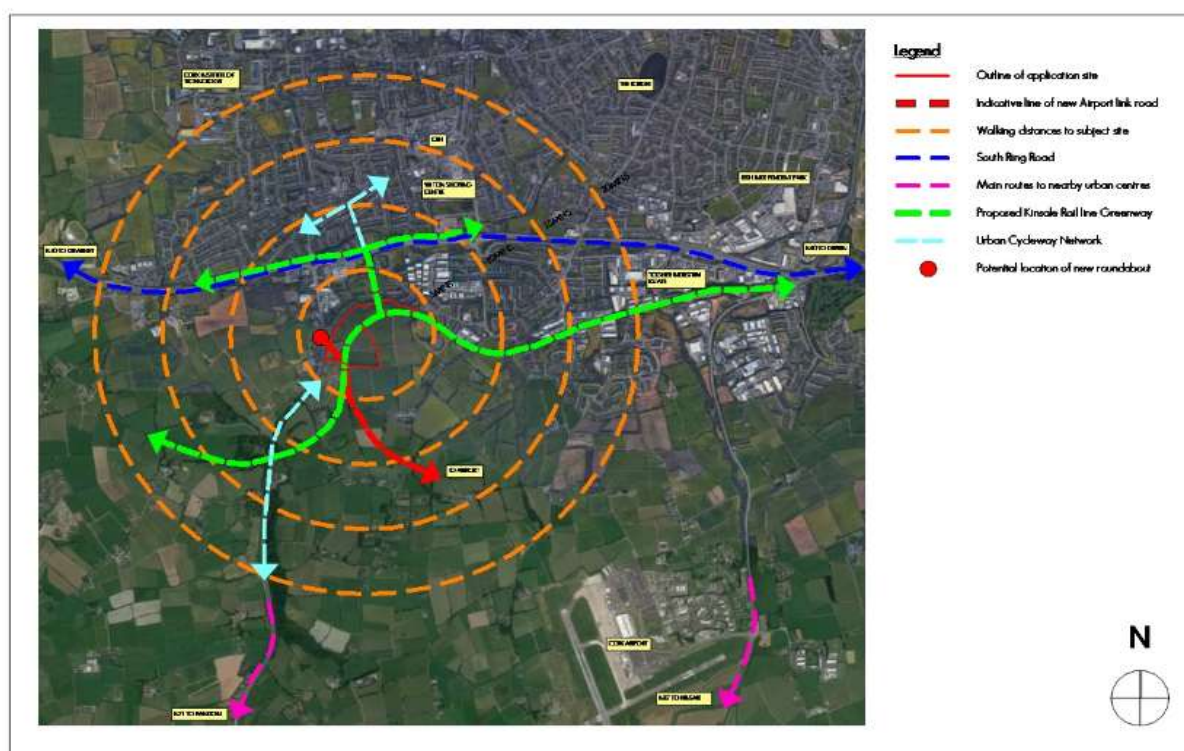
4.0 Location and Development Context

The defining key locational characteristic is that the site is located contiguous along its northern boundary to existing residential development at Eagle Valley to the north east and to zoned residential lands immediately to the north, owned by Kathleen O Mahony, with the National Asset Management Agency (NAMA) lands located further to the north west.

Immediately to the west, and between the most westerly field within the site and the Bandon Road, planning permission was granted for an access roadway to lands zoned for residential and now owned by NAMA, under Cork County Council reg. ref. 05/3477 and Part 8 planning consent for a roundabout on the adjacent N71.

Strategically, the site is located within the Southern Environs of Cork City to the south west of Bishopstown/ Wilton. As indicated above it is located off the N71 with the N40 Cork Ring Road easily accessed. Bishopstown is a well-established suburb which lies within the administrative area of Cork City Council. The site is within 10 minutes' walk of Wilton Shopping Centre and Bishopstown District Centre (ie is already compliant with the concept of the 15 minute city and will be moreso with the operation of the greenway) and less than a 15 minute drive time to the City Centre. Dunnes Stores Shopping Centre is located north of, and between the NAMA lands to the north of this subject site, and the N40 Cork Ring Road. Figure 3 below shows the site in its strategic context.

Figure 3: Site (Strategic) Location



The site is located conveniently to the proposed Cork Science and Innovation Park which is north of the N40 at Curraheen (located approximately 2.8km from the subject lands), Cork University Hospital, Marymount Hospice, Wilton Shopping Centre, Cork Institute of Technology and Cork Airport all within 1-7km of the subject site. Nearby recreational facilities include Murphy's Farm, Bishopstown Park, CIT Sports Grounds, Bishopstown GAA Club and Highfield Rugby Club.

There are a number of primary and secondary schools in the Bishopstown, Wilton and Glasheen areas. These include Scoil an Spioráid Naoimh Boys School, Bishopstown Girls Primary School, St Gabriel's Special School, Gaelscoil Uí Riada, St Catherine's Primary School, Glasheen Boys National School, Scoil an Spioráid Naoimh Secondary School, Mount Mercy College Secondary and Bishopstown Community School. These are all located less than 4km from the site. There are available spaces within these schools to accommodate new development in this location.

5.0 National Planning Policy and Guidance

National Planning Framework (NPF) 2018

The National Planning Framework (NPF) is a key national planning policy document, providing a broad planning framework for development and population growth in Ireland. The NPF provides a series of contextual planning objectives, taking into account the future long term population growth and development needs of Ireland to 2040.

Our client's site at Garranedarragh would be defined as a Tier 2 site in the NPF approach to land zoning as land contiguous to existing residential development that is able to connect to existing development services i.e., where the site is not currently serviced but is capable of being serviced. The provision of a greenway also substantially improves the attractiveness and delivery of the site for residential purposes.

The residential development of our client's site would be fully consistent with a number of key National Policy Objectives (NPO's) that will deliver the NPF's overarching objective of compact growth, including the following specific objectives:

- NPO 2a – A target of 50% of future population and employment growth will be focused in the existing five cities and their suburbs
- NPO 3a – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- NPO 3b – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints
- NPO 4 – Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO 33 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The National Planning Framework (NPF) provides an overarching planning policy framework for the State. It sets significant targets for Cork and suburban area with a population growth of 105,000 – 125,000 and a minimum population of 314,000 by 2040 which equate to a 50% population growth also by 2040 (it should be noted that the RSES has a population target date of 2040 and the RSES a population target date of 2031). As the site is strategically located in close proximity to the City Centre, is contiguous to existing development, given the NPF targets for Cork to increase densities, the site can be reasonably viewed as a sustainable development location and one where the rezoning to residential should occur and where it is sequentially preferred in planning terms given that the population needs of the city cannot be met within previous settlement boundaries.

The population target for the city and suburbs within the recently adjusted administrative boundary is set out below in Table 1, which is taken from the NPF document. From Table 1 below, it is clear that a population growth of between 105,000 and 125,000 is anticipated by the NPF for the City in the period up to 2040 as against the population target growth in the RSES of 75,000 for a shorter period up to 2031.

Table 1 Targeted Pattern of City Population Growth (Table 4.1 of the NPF)

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

Objective 3B of the NPF states that 50% of all new homes required from the population growth expected in cities, including Cork, are to be accommodated within built up areas with what can be assumed to be the remaining 50% accommodated in expanding areas within the City Council area:

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints”.

In our view it is inconceivable that a 50% requirement to expand the settlements of the 5 largest cities in the State, including Cork, would not include significant expansion in the southern environs of the State’s second city especially where the necessary access either exists or has the benefit of planning permission. There is also no policy requirement to significantly exceed this threshold especially where it may frustrate delivery of development led infrastructure elsewhere (ie the southern distributor road).

The requirement to accommodate housing need and population projections will require compact growth, significant investment in infrastructure and the achievement of increased densities to sustain and improve services including public transport. Objective 13 of the NPF goes on to state that:

“in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected”.

The NPF therefore prioritises the maximum use of scarce land resources without prescribing absolute development management standards such as density, height, and car parking standards as long as a high quality development is proposed and performance related outcomes can be achieved.

The Cork 2050 submission to the NPF which was prepared by Cork City and Council Councils recommends the northern and southern environs of the city will play important roles in facilitating residential growth in the development of the city. The rezoning of this site would provide Cork City with a significant development yield that would contribute to meeting population growth targets and which would facilitate and sustain economic objectives in accordance with the objectives of the National Planning Framework. To provide context, some 340,000-380,000 additional people are projected for the Southern Region and of this, Cork city, as the State’s second city, can be expected to accommodate a substantial amount of this projection. The subject site and the Part 8 approved roundabout is a key gateway into the southern environs and facilitates expansion in an easterly direction and the attractiveness of the this location is greatly enhanced by the existence in due course of the greenway.

Other Key Considerations from the NPF

The NPF identifies the advantages of providing greenways, blue ways and peatways as a means of advancing sustainable and activity based tourism which has its own advantages but also identifies advantages to connecting communities and providing for healthy pursuits and sustainable modes of transport.

Within Section 5.4 (Planning and Investment to Support Rural Job Creation) the development of a strategic national network of these greenways is identified as a priority with support for the development of rural communities and job creation in the rural economy, as well as the protection and promotion of natural assets and biodiversity.

National Policy Objectives recognise the importance of maintaining and protecting the natural landscape and built heritage. 'National Strategic Outcome 3' (Strengthened Rural Economies and Communities) seeks the development of a national long-distance Greenway/Blueway Network where *'Such a network, including rural walking, cycling and water-based recreation routes, as well as 'peatways', has demonstrated major potential to bring new life to regional and rural locations through the "win-win" scenario of increased tourism activity and healthier travel.'* This win-win scenario is addressed later in this submission. These objectives and benefits are reflected in National Policy Objective 22 which seeks to: *'Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.'* This emphasis on greenways in national guidance offers not only the potential for sustainable tourism development but also a cycling and pedestrian first, and public transport next, alternative to promoting primary use of the private vehicle to serve future residential development.

National Adaptation Framework, Planning for a Climate Resilient Ireland (2018)

Ireland is a signatory to the Paris Agreement (2015) which is a legally binding agreement to restrict global temperature rise, and to limit any increase, to significantly reduce the risks and impacts of climate change. Ireland's first statutory National Adaptation Framework (NAF) was published in 2018. In relation to the *'Built Environment and Spatial Planning'* it states that *'It is clear that climate change considerations need to be taken into account as a matter of course in planning-related decision-making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built environment.'* In this case the application of the principles of planning for climate change means utilising this opportunity to meet housing need and combating urban sprawl.

Climate Action Plan 2019 - To Tackle Climate Breakdown

The Climate Action Plan 2019 contains 183 actions. The actions identified are to be implemented by 13 Government Departments and 40 agencies under the remit of those Departments, requiring a deep level of collaboration across Government. Action No. 15, of the plan is to implement the National Planning Framework. It is stated *'Our 2030 decarbonisation ambition will require all sectors to step-up a level if we are to achieve our EU targets.....'*

In transitioning to a low carbon and climate resilient society, actions to address the spatial pattern and urban form of development are required in addition to actions that focus on the individual building envelope. Similarly, actions that integrate land use and transport planning i.e. consideration of spatial pattern, urban form and mobility, are required, in addition to actions that focus on individual transport measures or modes. These cross-cutting considerations are necessary, because the spatial pattern of development and related urban structure directly influence the need to travel in the first instance. They also determine the pattern of movement, in terms of the frequency and duration of trips and ultimately, behavioural choices regarding modes of transport that may be used.

In summary, the cross-cutting, interrelated measures set out in the NPF to achieve compact growth, sustainable mobility, and a low-carbon and climate resilient society are shared in common with the National Development Plan (NDP) as part of Project Ireland 2040. They will have a cumulatively positive downward impact on greenhouse gas emissions, as well as a range of other environmental, social, and economic benefits. The subject site if rezoned and consequentially developed, with utilisation of the greenway is entirely consistent the national Climate Action Plan.

Rebuilding Ireland: Action Plan for Housing and Homelessness

The Rebuilding Ireland – Action Plan for Housing and Homelessness has a five pillar approach as follows:

- Pillar 1: Address Homelessness
- Pillar 2: Accelerate Social Housing
- Pillar 3: Build More Homes
- Pillar 4: Improve the Rental Sector
- Pillar 5: Utilise Existing Housing

Pillar 3 focuses on improving the viability of housing construction, with the objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 new homes on average per annum.

A key objective of this Action Plan is the ramping up the production of additional new housing stock in regional cities. While activity in housing development has increased, it is clear that demand is still far outstripping supply. A recent report carried out by Cork County Council indicated that 1,250 houses were constructed in the County Council area of jurisdiction last year and a target has been set to have 3,000 built annually between now and 2040. Last year's figure is well below the required target. The intended development following rezoning would contribute positively to meeting the main objectives set out in the Rebuilding Ireland Action Plan by delivering a residential development of scale at a sustainable location close to Cork City.

6.0 Regional Planning Policy and Guidance

Regional Spatial and Economic Strategy for the Southern Region (RSES) 2020

Regional Spatial and Economic Strategies provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework. In supporting the NPF, the RSES prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. To achieve compact growth, the RSES prioritises housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling. Walking and cycling opportunities are a particular attribute of our client's site when the proposed greenway on the former redundant rail line comes to fruition.

The RSES seeks to attain sustainable compact settlements with the 15-minute city and town concepts, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. The subject site is within 10 minutes of a service centre and local shops including a Dunnes Store and Wilton Shopping Centre which are just minutes away. Further amenities are a 10 minutes or less via a pleasant and healthy walk or cycle on the greenway.

The RSES sets a population target of 283,669 for Cork City and suburbs by 2031. In accordance with the objectives of the NPF, to promote the consolidation of Cork City and suburbs, a target of a minimum of 50% of all new homes should be within the built-up footprint in Cork and 30% in other metropolitan settlements.

The RSES seeks to strengthen the role of the Cork Metropolitan Area of which the site forms a part as an international location of scale, a complement to Dublin, and a primary driver of economic and population growth in the Southern Region. The RSES includes a Cork Metropolitan Area Strategic Plan (MASP) based on the principles of a sustainable place framework. The MASP sets out the following guiding principles which are relevant to the development of the subject site:

- A living city and suburbs: A city and suburbs offering a mosaic of quarters, comprising of residential suburbs, strategic employment locations, commercial areas, waterfront living and the vibrant social and cultural life of a European City with a unique landscape setting.
- Metropolitan Engine: Combined with the city and suburbs, a well-functioning, socially inclusive and energising place providing residential, employment, health, business, political, educational, and commercial and transport functions driving the region. Targeted growth will occur in Metropolitan Cork which has significant capacity within its hierarchy of settlements and strategic employment locations along public transport corridors.
- Integrated transport and land use: Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects under the development of a Cork Metropolitan Area Transport.

The RSES identifies the regional growth targets for the Cork MASP which are set out in Table 2 below. The site is located within the Cork City and Suburbs area.

The Cork MASP identifies strategic housing and regeneration locations within the metropolitan area. These give an indication of existing initiatives and, as identified in Chapter 3 of the RSES and MASP Goal 7, new initiatives must meet NPF growth targets. Achieving these targets will require in-depth consideration for new locations and initiatives by each local authority (such as the Strategic Land Reserve Initiative undertaken by Cork County Council) where the growth in the next 6 years to 2026 is 50,000 people.

Table 2: RSES Population Growth Targets to 2031

Location	2016 Base Year	Growth to 2026	Growth to 2031	Population Target 2031
Cork City and Suburbs	208,669	50,000	75,000	283,669
Rest of Cork Met. Area	95,500	20,281	29,657	125,157
Total Metropolitan Area	304,169	70,281	104,657	408,826
Balance of Cork County	238,699	25,739	36,695	275,394

It is accepted that additional sites may become available, and the Cork MASP recognises the need to be flexible to accommodate opportunities such as those presented by the intended greenway splitting our client's site. It is required that any such opportunities be integrated with sustainable land use and transport planning as per the objectives in the Cork MASP. The provision of a greenway offers a unique benefit to developing in this location consistent with MASP and sustainable land use and transport opportunities are balanced and achievable in this instance.

The strategic residential, mixed use and regeneration areas identified in Cork City and Suburbs for the population growth of 50,000 by 2026 and of 75,000 to 2031 (which equates to a growth of a quarter and a third respectively) include Cork City, Cork City Docks, Tivoli, City Suburban Areas, North West Regeneration Area, Mahon, Ballincollig, North Environs – Kilbarry/ Blackpool and Glanmire. The subject site is located within the City Suburban Areas category. The 3,986 units identified for the entire City Suburban Areas includes those which would be potentially available for the southern environs within which the subject site is located. Table 3 below summarises these estimates contained in the RSES.

Table 3: RSES Indicative Residential Yields for Cork City and Suburbs (Highlighted in Bold)

Location	Indicative Residential Yield
Cork City	1,014 units
Cork City Docks	9,500 units
Tivoli	At least 3,000 units
City Suburban Areas	3,986 units (this figure will grow as further “windfall” sites emerge).
North West Regeneration Area	200 net additional units
Mahon	1,021 units.
Ballincollig	4,582 (includes Maglin UEA 3,570
North Environs – Kilbarry/ Blackpool	950 units - Blackpool Valley, Kilbarry and the Old Whitechurch Road 3,600 units – Ballyvolane UEA
Glanmire	1,567 (includes Ballinglanna/ Dunkettle UEA 1,200 units).
Total Indicative Residential Yield Cork City and Suburbs	29,420 residential units

The above table has an estimated indicative total residential yield of 29,420 units based on appropriate densities applied by the Regional Assembly and based on an average household size from the 2016 Census of 2.75 persons per household (the State average household size). The population to be catered for is 80,905, which is broadly in line with the 75,000 target population growth to 2031. However, the household size in Cork City was less than the corresponding State figure in 2016 and Project Ireland 2040 states that “currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040”.

The RSES contains a Metropolitan Area Strategic Plan (MASP) for Cork. The MASP seeks to:

“Promote the Cork Metropolitan Area as a cohesive metropolitan employment and property market where population and employment growth is integrated with: (i) the city centre as the primary location at the heart of the metropolitan area and region reinforced by; (ii) the continued regeneration, consolidation and infrastructure led growth of the city centre, Cork City Docklands, Tivoli and suburban areas; (iii) active land management initiatives to enable future infrastructure led expansion of the city and suburbs (to be assessed by Core Strategy initiatives); and, (iv) the regeneration, consolidation and infrastructure led growth of metropolitan towns and other strategic employment locations in a sustainable manner”.

7.0 Local Planning Policy

Although the lands are now entirely within the Cork City administrative area, the Cork County Development Plan 2014 and the Ballincollig Carrigaline Municipal District Local Area Plan 2017, within which the subject site is located, will remain in force until the emerging City Development Plan is adopted.

As per Section 30 of the Local Government Act 2019, *‘the development plan in force immediately before the transfer day in respect of the functional area of the county council shall, on and after that day, continue to apply in respect of the relevant area until the next making of a development plan by the city council in respect of the functional area of the City Council.’*

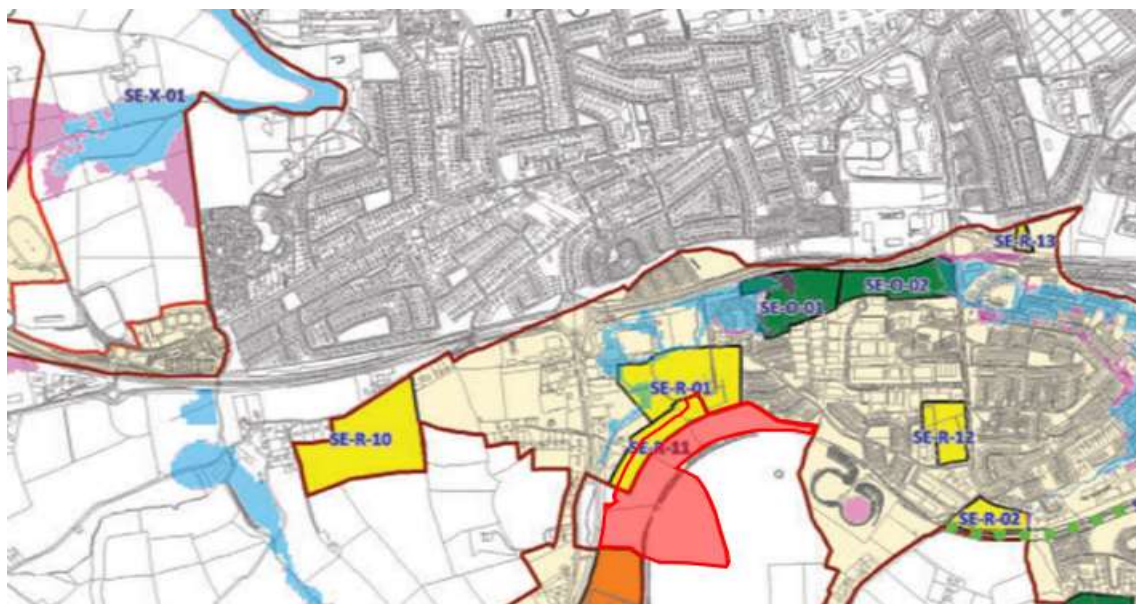
Ballincollig Carrigaline Municipal District Local Area Plan 2017

The site is located within the Ballincollig Carrigaline Municipal District Local Area Plan 2017 (LAP) where it is predominantly un-zoned for development but where a relatively small northern strip is zoned SE-R-11 for Medium A density residential development. The stated zoning objective for SE-R-11 is for

“Medium A density residential development. Any proposals for this site will include a detailed traffic impact assessment and will address the need for road and junction improvements in the vicinity”.

The lands within our client’s ownership that are zoned already in the Local Area Plan for residential development are shown as non-shaded but within the red line of Figure 1 above. The extent of land zoned for residential purposes is shown in yellow in Figure 4 below.

Figure 4: *Our Client's Lands that are Already Zoned (shaded as yellow within the Red Line)*



This existing zoning recognises the potential of the site to provide residential accommodation subject to the necessary roads and junction improvements. As already outlined, a Part 8 Planning Permission for an 80m diameter roundabout on the N71 at this location provides access to SE-R-11 lands and fulfils the requirement of this existing zoning SE-R-11 zoning objective as well as providing access to the NAMA lands further north. The provision of such a roundabout can serve several access needs in this immediate area, including our client's. The adopted LAP identifies the remainder of the site within a 'Prominent and Strategic Metropolitan Green Belt Area' whose function is to protect the setting of the City and the Metropolitan Towns and to provide easy access to the countryside and facilities for sport and recreation. The overall zoning objective for Greenbelt lands facilitates agriculture, recreation or open space uses and activities. That existing objective within the LAP is clearly at odds with the intention of extending the City Boundary to meet the development, housing and service needs of an expanding city through a greatly increased population and for the city to more clearly distinguish itself as Ireland's second city, and finally to act as a counter weight to Dublin. It would be our view that any green belt designation or zoning should commence from a spatial perspective immediately beyond the 'new' city boundary. There is no southern boundary to the existing Prominent and Strategic Metropolitan Green Belt zoning or designation but confirmation of that zoning or designation as it relates to this site is shown in Figure 5 below.

Figure 5: *The Majority of Our Client's Lands within Metropolitan Greenbelt*



The LAP promotes the consolidation of the southern suburbs within the existing development boundary to support growth within the lifetime of that Plan. The broader context provided by the LAP is evident in the provision of Objective SE-GO-01 entitled 'Population and Housing' which aims to secure the development of 1,285 new dwellings in the South Environs between 2017 and 2023 to be accommodated on appropriately zoned lands. The subject site has come into consideration to meet that identified need in the southern environs and accordingly this site is identified as part of the Strategic Land Reserve (SLR) identified by the County Council for future predominantly residential development.

The subject site is identified within SLR site no. 6. In previous discussions with the City Council a concern about zoning the subject site as residential would have been the availability of water supply and access. The Council identified these concerns previously as impediments to the short to medium term development of SLR no. 6. The City Council will now be aware however that planning permission has been granted last month by An Bord Pleanála under their reference TA28.310274 for Ardstone Developments at Ardostig and Waterford Road which is located within the western part of SLR6 – the subject site being located within the eastern part. The significance of the Board's decision is that the County Council's concerns about water supply identified in their Strategic Land Reserve Assessment in 2018 for SLR6 (both western and eastern parts) being premature upon delivery of water supply upgrade is now clearly considered unfounded. Similar unsubstantiated concerns were advanced by the City Council for previously resisting zoning on the subject lands and should not be advanced as reasons for resisting rezoning in this instance. Additionally, the Part 8 permission for the roundabout and enhanced dual carriageway to serve our client's site and others' remains in place indefinitely.

This creation of the SLR is itself a recognition, quite apart from the extension of the City boundary, that the city needs to expand outwards to meet its development needs and increased population growth, and the role identified for it in national and regional planning guidance. The inclusion of the site within the SLR is an indication that the County Council identified its potential for future development and for the site to help the city and metropolitan area to meet its ambitious targets set out in national and regional planning policy and guidance. The expansion of the city contiguous to existing development and residential zoning is compatible with the concept of the compact city.

The existing adopted LAP for the area identifies the creation of a greenway on the former rail line as a key objective for the area under Objective CL-U-13. CL-U-13 seeks the implementation of the green way on the former rail line where practical.

Cork County Development Plan 2014

Within the current County Development Plan, the site forms part of the Northern Environs within the County Metropolitan Strategic Planning Area, which as stated at paragraph 2.2.23 of the Development Plan is “the main engine of population and employment growth for the region”.

The north and south environs of Cork City are identified as being an important part of the Cork Gateway. The strategic aims for the Cork Gateway are set out in Objective CS 3-1 Network of Settlements which for the City Environs (North and South) seeks:

“Growth in population and employment so that the Cork Gateway can compete efficiently for investment and jobs.”

Objective CS 4-1 of the Development Plan prioritises certain locations to accommodate the planned population growth, including the southern environs, and seeks to:

“(g) Develop the Cork City Environs so that they complement the city as a whole. In the south, priority should be given to consolidating the rapid growth that has occurred in recent years by the provision of services, social infrastructure and recreation facilities to meet the needs of the population.”

Table 3.1 (Settlement Density Guide) identifies that the southern environs have ‘Public Transport Corridor Potential.’ We would point out that this is now additionally the case following the identification of the former rail line as a potential greenway.

County Development Plan Objective TM 2-4: Bus Transport (Metropolitan Area) indicates that the County Council will support and prioritise the following key Bus Transport initiatives:

a) Encourage both the improvement and extension of services particularly to parts of Cork South Environs that currently lack an appropriate service and greater usage of the bus network so that they offer a realistic alternative to the private car in providing effective linkages between the main locations where people live and where they work.

8.0 Draft Cork City Development Plan 2022-2028

The following are the key elements of the Draft Plan that support the rezoning of our client’s site to residential.

Section 1.5 of the Draft Plan entitled ‘Strategic Vision’ sets out the following key objectives:

‘Compact growth

Integrate land-use and transport planning to achieve a compact city with 50% of all new homes delivered within the existing built-up footprint of the City on regenerated brownfield, infill and greenfield sites identified in the Core Strategy, and to achieve higher population densities aligned with strategic infrastructure delivery.

A city of neighbourhoods and communities

Develop a sustainable, liveable city of neighbourhoods and communities based on the 15-minute city concept, ensuring that placemaking is at the heart of all development.

Sustainable and active travel

To implement the Cork Metropolitan Area Transport Study (CMATS) and develop a transformed sustainable transport system with a significant shift toward walking, cycling and public transport and to enshrine this principle in all developments across the City.

Enhanced built and natural heritage

Protect, enhance, support and develop our built and natural heritage, our open spaces and parks, and our green and blue infrastructure, and expand our built heritage with new buildings, townscapes and public spaces achieved through the highest standards of architecture and urban design.

A strong and diverse economy

Support Cork City's role as the economic driver for the region and the creation of a strong, resilient, diverse and innovative economy.

A resilient City

Contribute to a framework for the transition to a low-carbon and climate-resilient City, resilient to extreme weather events, pandemics, economic cycles and other potential shocks.

A healthy, inclusive and diverse city

Build on Cork City's status as a World Health Organisation designated Healthy City, offering an inclusive and vibrant environment for all whilst promoting healthy living and wellbeing.

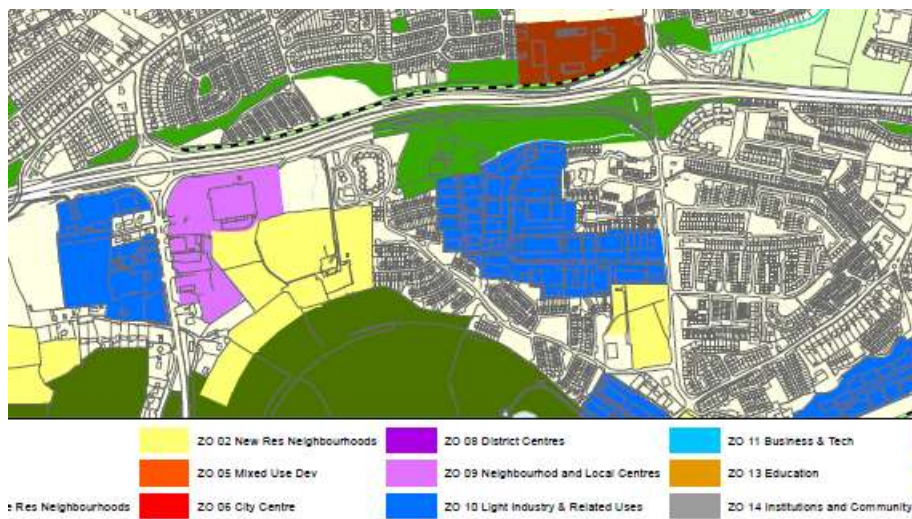
A connected City

Cork City will continue to be a highly connected city providing local, regional, national and international connectivity.'

These highly desirable objectives are supported by our client.

The existing residential SE-R-11 zoning of our client's site contained in the adopted Local Area Plan has been carried forward into the Draft City Plan as shown in Figure 6 below as ZO 02 New Residential Neighbourhood. That part of our client's site zoned Metropolitan Green Belt in the LAP is now designated as Hinterland (shown in dark green below). Our client requests is that the lands zoned hinterland be rezoned ZO 02 New Residential for the reasons set out below.

Figure 6: Extract from *Draft Cork City Development Plan Zoning Map 08*



The context for our client seeking the rezoning of their remaining lands are referenced to the following key objectives and aspirations identified in the emerging City Plan.

Para 1.23 states that CMATS was produced by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council. That document represents a coordinated land-use and transport strategy for the Cork Metropolitan Area up to 2040. It envisages an investment of €3.5 billion to improve mobility in the Cork Metropolitan Area, including Cork City, with significant investment in public transport, walking and cycling. These are highly ambitious projects stated in CMATS which will have to be funded by the Exchequer and funded and facilitated by development the consequences of which are set out below.

Building on the key elements of the vision for Cork City and hinterland the following are the key objectives identified in the emergng Plan that we believe justify a rezoning of our client's site in Garranedarragh.

SO1 – Compact Liveable Growth

Deliver compact growth that achieves a sustainable 15 minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city.

SO2 – Delivering Homes & Communities

Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.

SO3 – Transport & Mobility

Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.

SO4 – Climate & Environment

Transition to a low-carbon, climate-resilient and environmentally sustainable future. Implement climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigate and adaptation.

SO5 – Green and Blue Infrastructure, Open Space and Biodiversity

Manage and enhance green and blue infrastructure, to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.

SO8 – Environmental Infrastructure

Ensure efficient and sustainable use of water services, enhance water quality and resource management. Manage waste generation and treatment and support the principles of the circular economy. Improve air quality and promote pro-active management of noise. Enable the sustainable delivery of digital infrastructure, renewable energy and environmental improvements.

SO9 – Placemaking & Managing Development

Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where place-making is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhood.

Para 32 2.19 identifies that the NPF targets 60% population growth for Cork City by 2040. This will result in an additional 125,000 people living in the City within 20 years. A breakdown of shows how the City will need to achieve 10% - 17% population growth within each of the next four census periods. Over the last 30 years, Cork City has grown at a lower rate of 2% - 5%. In this context the stated population projections are ambitious. The emerging Plan states that significant planning and investment will be required over a sustained period to achieve the NPF growth target by 2040.

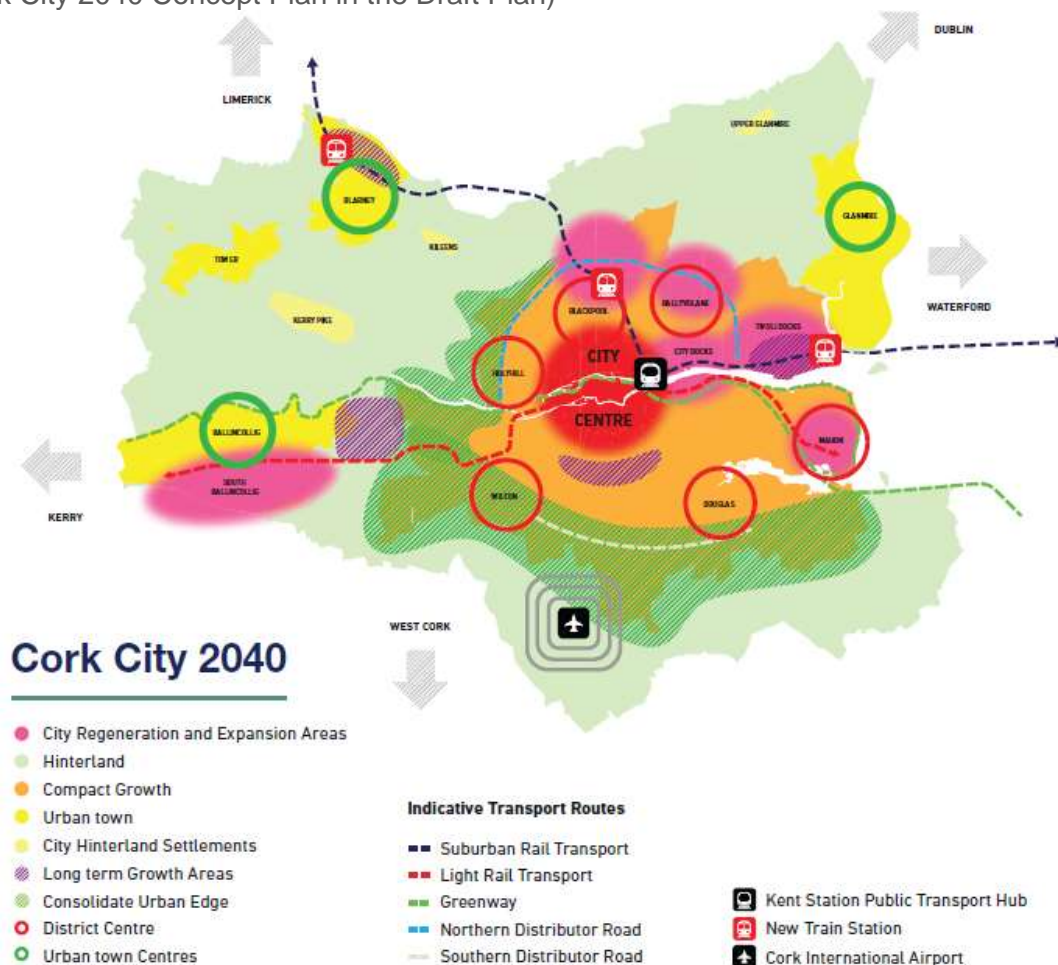
Figure 2.6 of the Draft Plan which is excerpted below in our Figure 7 below shows a doubling of population growth in the city starting in 2022 and running through the course of the emerging Plan period until 2028 at which point such high growth levels are maintained and are then close to doubling again in the later period to 2040. The obvious point to be made on this is that population growth to the period 2040 of the NPF should be more balanced and therefore takes a very conservative approach to development in the next (first) three new plan cycles. A more balanced allocation and increase in the immediate plan cycle to 2028 would surely have been warranted given the existing housing crisis and currently very ambitious targets for housing completions issued by the Department, especially since there are grave reservations as to whether those targets for house completions can be met and in light of the fact that they are to increase further. It would be our view that growth that should be accommodated now is being postponed with consequences for inward investment and confidence.

Figure 7: Projected Population Growth (Taken from Draft City Plan's Figure 2.6 entitled Population Trends and Targets, 1991-2040)

	1991	1996	2002	2006	2011	2016	2022	2028	2031	2040
Cork City*	178,716	184,502	191,277	195,478	200,373	210,853	235,643	260,433	286,178	335,853
%Change	–	3.2%	3.7%	2.2%	2.5%	5.2%	11.8%	10.5%	9.9%	17.4%

The spatial distribution of the above population targets is shown in Figure 8 below which is the Core Strategy Diagram which accompanies the emerging Core Strategy. On the basis of the indicative location of the southern distributor road we would estimate that our client's site is contained within an area of compact growth and consolidated urban edge. These would appear to be contradictory designations as compact growth strongly implies being within or contiguous to built form rather than the consolidation of any built form. We can understand that consolidation requirement for the hinterland area but not for our client's lands which are already partially zoned. The location of the southern distributor road, which we know full well is indicative only at this stage, clearly does serve any development or form access to development which in our view greatly dilutes its purpose and function, and indeed its delivery, in this location.

Figure 8: *Diagrammatic Representation of the Emerging Core Strategy* (entitled Figure 2.8: Cork City 2040 Concept Plan in the Draft Plan)

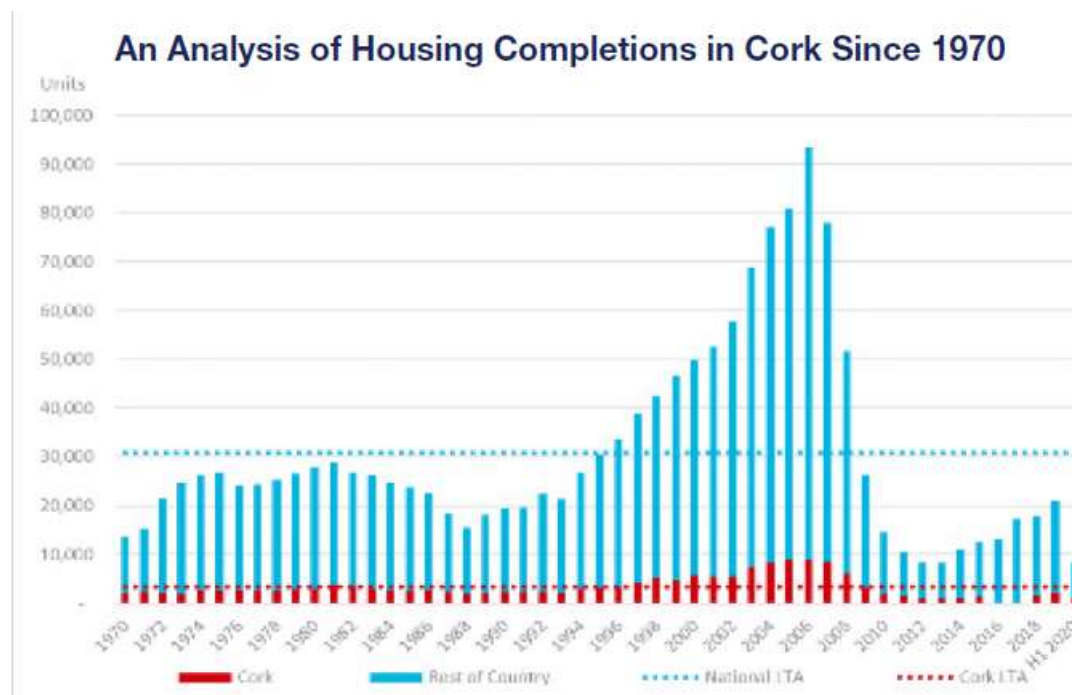


Para 2.24 presents the concept of a 15 minute city and 10 minute walkable neighbourhood both of which present unsurpassed opportunities for sustainable and primarily cycle and pedestrian favoured development on our client's land that would be complementary to the provision of a greenway on the former line that splits our clients site.

The concept of a walkable neighbourhood in immediate proximity to the intended greenway brings the opportunity to make that greenway the centre of development. That concept of a walkable neighbourhood and community could not be realised in a better location than that of our client's site. Para 2.27 states that the concept encourages local active transport and really there can be no better example of that than a development served by and serving that greenway. Para 2.27 states that the design of new buildings and public spaces should respect local context and offer constant opportunities to interact. New development should focus on creating a positive experience for people and communities in their neighbourhood, including a mix of uses that increase interactions at street level. Well-designed neighbourhoods provide a quality of life for the individual and their neighbourhood that stimulates and enriches everyday lives.

Figure 2.13 of the Draft Plan contains an analysis of housing completions in Cork since 1970. It shows a level of completions since 2010 less than what it was in the early to mid 1970s. As indicated above this should be considered in the context of what are very ambitious population targets for the city up to 2040 which would question the conservative approach to the zoning of residential land especially in the context of our client's land that is the subject of this submission and which is contiguous to their already zoned land. Figure 2.13 of the emerging Plan is reproduced below as Figure 9 of this submission.


Figure 9: An Analysis of Housing Completions in Cork since 1970 (taken from Figure 2.13 of the Draft Plan)



The approach to development in the hinterland, within which our client's subject site is located, is that this area is managed through the delivery of scaled community, housing and local employment developments in the settlements of Killeens, Upper Glanmire and Kerry Pike. It is stated in the emerging plan that any development proposals in the remainder of the hinterland (outside these settlements) will be closely managed to protect against unnecessary and unplanned urban sprawl. In our view this can be very clearly taken to be that there will be a presumption against development of any significant size in the hinterland except in the most unique or very exceptional circumstances. The hinterland designation has effectively taken the role previously exercised by the greenbelt designation even though the greenbelt designation became effectively redundant with the advent of the extended city boundary which would have been undertaken to stimulate development. This has the effect of neutralising the lands given to the City Council through boundary extension and substitutes one blanket ban (the former Greenbelt) for another (the currently proposed hinterland zoning).

Figure 10 below shows Table 2.2 of the Draft Plan and the allocation of future population growth within the city. It shows that just 13% of the proposed growth forecast is to be located in all the suburban area of Cork – the second city in the State. This obviously includes the southern environs which will have to share its allocation with the northern environs and those other remaining parts of Cork's suburbs

Figure 10: Core Strategy Population Allocations (Taken from Table 2.2 of the Draft Plan)

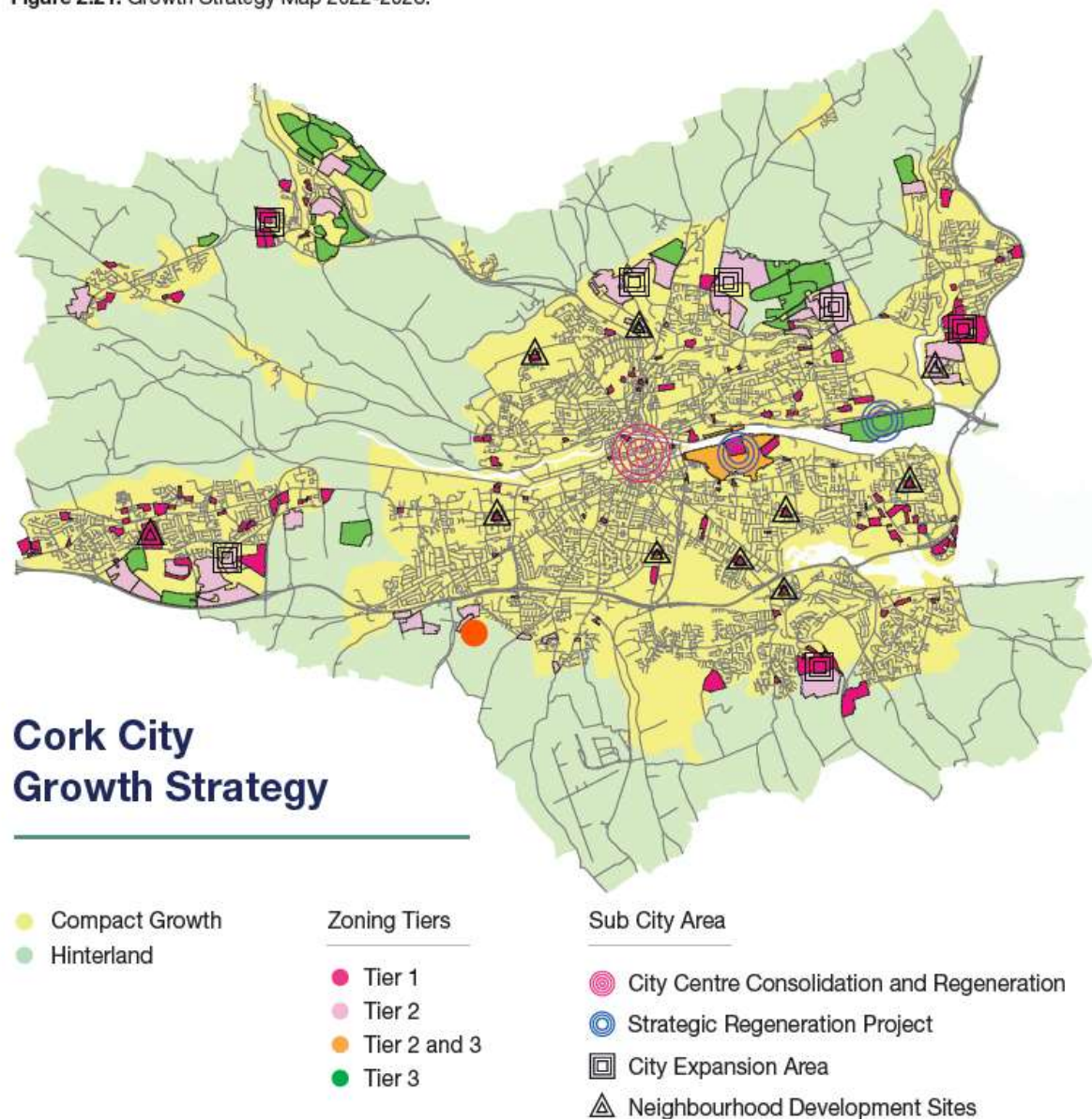
Core Strategy 2028: Compact Liveable Growth¹						
 Cork City	Baseline Populations (2016)		Future Population Growth (2028)		Actual Population Growth (2028)	
	Existing Population	% of Total Population	Future Population	% of Total Growth	Actual Population Growth	Proportionate Growth Rate
City Centre	22,732	10.8%	26,218	7.0%	3,486	15%
City Centre Regeneration (new build)	–	–	23,945	2.4%	1,213	5%
City Centre Consolidation (re-use)	–	–	2,273	4.6%	2,273	10%
Docklands	1,667	0.8%	7,737	12.2%	6,070	364%
City Docks	1,667	0.8%	7,239	11.2%	5,572	334%
Tivoli Docks	0	0.0%	498	1.0%	498	–
City Suburbs	141,808	66.7%	160,289	37.3%	18,481	13%
North East Suburb	26,841	12.7%	35,561	17.6%	8,720	32%
North West Suburb	23,125	11.0%	23,728	1.2%	603	3%
South East Suburb	51,605	24.5%	58,457	13.8%	6,852	13%
South West Suburb	40,237	19.1%	42,543	4.7%	2,306	6%
Urban Town	33,886	16.1%	54,650	41.9%	20,764	61%
Ballincollig	18,159	8.6%	29,003	21.9%	10,844	60%
Blarney	2,550	1.2%	5,881	6.7%	3,331	131%
Glanmire	9,903	4.7%	15,329	10.9%	5,426	55%
Tower	3,274	1.6%	4,437	2.3%	1,163	36%
Hinterland	10,521	5.0%	11,300	1.6%	779	7%
Hinterland Settlements (3)	1,792	0.8%	1,971	0.4%	179	10%
City Hinterland (Single Dwellings)	8,729	4.1%	9,329	1.2%	600	7%
NET Total (-25% site area)	210,853²	100%	260,194	100%	49,580	24%

A measly 6% of population growth is allocated to the south west suburbs containing Wilton Shopping Centre, UCC, Cork University Hospital and other amenities and facilities as indicated above in Section 4.0 above. In fact, if one totals the south west and south east figures into a total southern suburb figure for growth one gets 19% which is not far off half the 35% growth allocated to the northern suburbs.

Figure 11 below shows the allocation of that population growth to the various parts of the city. The subject site is shown with a red dot and the existing zonings to which are client's subject is contiguous are clearly shown. It is clear that the green hinterland area is shown 'tight' to the existing zoning which is not the case elsewhere in the suburbs we believe.

Figure 11: Growth Strategy Map 2022-2028 (taken from Figure 2.21 of the Draft Plan)

Figure 2.21: Growth Strategy Map 2022-2028.



Para 2.55 of the emerging Plan sets out the City Council's application of the requirement for compact growth in line with national and regional planning policy and guidance. The draft plan states in para 2.55 that:

'National Planning Objective 3(b) of the NPF requires at least half (50%) of all new homes targeted in each of Ireland's 5 cities to be delivered within their existing built-up footprint. Appendix 4 of the NPF sets out a definition of "existing built-up footprint" based on a CSO definition. When applied to Cork City this definition is too broad, as it covers the majority of lands within the City boundary. To address this, an assessment of the location and nature of all sites in the Core Strategy has been carried out. This determined whether these sites are within the existing built-up footprint or are greenfield in nature. Sites largely surrounded by existing development are considered to be within the city's existing built-up footprint. This includes infill and brownfield sites and sites contiguous to the existing city or urban town. Lands that are largely separate from the existing built-up footprint are considered greenfield in nature. Table 2.5 and Figure 2.20 show how 65% of the Tier 1 and Tier 2 lands set out in the core strategy are located within the existing built-up footprint of the City. This reflects the Core Strategy's objectives and targets to deliver compact growth in line with the NPF.'

From Figure 2.22 (Built-Up Footprint and Greenfield Growth Target Locations 2022-2028) contained within the Draft Plan it is clear that land that is undeveloped or committed in planning terms is identified as being within the existing built up footprint and the lands to the south currently zoned as metropolitan green belt are identified as hinterland where there is essentially a prohibition on development.

The role of the City Hinterland is expanded upon thus:

'Additional development needs to be examined in the context of the local and environmental characteristics of the area. Balance any future development with the wider needs of Cork City to achieve compact growth and more sustainable transport patterns. Ensure environmental preservation and the retention and enhancement of urban and rural character. Cork Airport will be supported in its role as an international gateway for the City, wider Metropolitan Area and Southern Region from a transport, connectivity and economic viewpoint.' Key locations identified within the hinterland include Green and Blue Infrastructure networks. The key deliverables identified within the city hinterland is the 'Sustainable development of green and blue infrastructure networks.'

The overall strategy for the City Hinterland is set out in para 2.57 of the emerging plan which states that the hinterland provides a number of very important planning functions which include the following:

- Acts as a greenbelt preventing urban sprawl into the surrounding countryside;
- Is rich in biodiversity, ecology and wildlife;
- Provides a valuable range of green and blue infrastructure assets;
- Ensures a distinctive landscape character and setting within the Cork Metropolitan Area; and
- Protects the character and integrity of the city and its urban towns and settlements.

Para 2.59 states that the primary objective for City Hinterland is to preserve the character of the area generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity.

Strategic Objectives

Chapter 2 of the emerging plan concludes with identifying the key strategic objectives of the emerging plan. The key objectives in respect of this submission are as follows:

‘Objective 2.1: United Nations Sustainable Development Goals

To integrate the UN SDGs and the NPF’s National Strategic Outcomes into land use planning and management of Cork City through specific development objectives that will be monitored and reviewed.

Objective 2.2: National Planning Framework Targets

Cork City Council will align with the National Planning Framework (NPF) to achieve the ambitious growth targets set out for Cork City and Metropolitan Area up to 2040. The Council will apply local planning policy approaches in combination with active land management measures to help achieve these targets.

Objective 2.3: National Development Plan Investment

Cork City Council will actively support the planning, design and delivery of capital investment in the National Development Plan (NDP) and other investment programmes that maximise delivery of infrastructure-led growth, deliver compact liveable growth and climate action to make the city an attractive, diverse and resilient place to live.

Objective 2.4: Cork Metropolitan Area Strategic Plan

To develop Cork City in a manner that strengthens the role of the Cork Metropolitan Area as an international location of scale and a primary driver of economic and population growth in the Southern Region.

Objective 2.5: Regional Investment

To identify and seek investment packages into the Cork Metropolitan Area from European and Government Exchequer funding streams that help deliver population and job targets, prioritise infrastructure led investment and quality of place.

Objective 2.8: The 15-Minute City

To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City’s liveability.

Objective 2.9: Low Carbon City

Support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City’s environmental assets.

Objective 2.10: Mix of Uses

Support the delivery of a diverse mix of suitable uses that enhance Cork City’s network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.

Objective 2.11: Design-Led City

Follow a design-led approach that delivers sustainable, high quality placemaking. Development shall contribute positively to the quality of the surrounding built and natural environment and shall be planned and designed with reference to climate change mitigation and adaptation.

Objective 2.12: Walkable Neighbourhoods

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.*
- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).*
- c. Ensuring a child friendly and age friendly environment with a mix of household types.*
- d. Designing a safe place that enables access for all.*
- e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.*
- f. Being well-connected with easy access to public transport and active travel.*
- g. Providing enhanced permeability for walking and cycling.*

Objective 2.14: Neighbourhood Mix

Promote high quality neighbourhoods by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities.

Objective 2.15: Neighbourhood Design

The design and siting of development shall create a sense of community and identity, enhance connectivity, incorporate creative approaches to urban design, enhance landscape character and green and blue infrastructure and respect the local context and character of the area.

Objective 2.23: Quality of Life

In planning for future population growth, Cork City Council will assess and monitor quality of life factors including improvements in the urban environment, community infrastructure and cultural experiences that can increase the numbers of people seeking to live, work, study, visit and experience the city.

Objective 2.24: Implementing the Core Strategy

To implement and support the delivery of the Core Strategy in accordance with the Core Strategy Map and Table, the Growth Strategy Map and Table and the Objectives for City Growth Table set out in this plan.

Objective 2.25: Compact Growth

It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.

Objective 2.26: Housing Supply

Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built.

Objective 2.28: Supply of Zoned Land

Monitor and review the Core Strategy to ensure that sufficient zoned land continues to be available to meet the City's housing requirements over the lifetime of the Plan.

Objective 2.30: Managing the Hinterland

Any development proposals in the remainder of the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl.'

Roads Objectives

Table 4.2 of the Draft Plan sets out the CMATS targets for roads with a roads appraisal of the southern distributor road to be undertaken by 2026 and the delivery of both the northern and southern distributor roads to be delivered by 2031 (ie mid term of the next plan cycle).

Walking and Cycling Objectives including the Greenways

Table 4.3 sets out the Walking and Cycling Improvements envisaged to be delivered or at least started over the 6 year period of the emerging plan post adoption projected in 2022. Below is the objective containing reference to the planned Greenway on the former Cork-Bandon Greenway.

'Lehanaghmore Road: In addition to road enhancements in this area of the city this contains a Improvement Scheme suite of measures aimed at improving pedestrian connectivity including new footpaths, pedestrian crossings and a new pedestrian cycling bridge which will link to the planned Greenway on the former Cork-Bandon railway line. This scheme will provide connectivity between the Togher and Lehanaghmore and further on the City Centre and western suburban and will address the infrastructural deficit which has been more acute as the area developed in recent years.'

Walking Network Improvements are identified in Para 4.25 where it is stated:

'The Cork Walking Strategy 2013-2018 provided a clear vision and implementation plan for increasing the modal share of walking for commuting within Cork City's suburbs. The Walking Strategy proposed the development of a walking network that connects neighbourhoods, origins, and destinations, increases the permeability of the built environment, and creates an attractive, safe environment that prompts more people choosing to walk, resulting in a healthier population, a more liveable and sustainable city, and stronger communities.'

Para 4.30 states the following:

‘Cycling The National Development Plan (NDP) commits to the delivery of walking and cycling networks for all of Ireland’s cities. Key priorities for developing a cycling network for Cork are:

- Designating a coherent network of east-west and north-south cycle routes to provide access to all major trip generators.*
- Improve access to key employment areas and third level education as a priority, followed by schools.*
- Provide the highest possible level of service on the identified high demand corridors.*
- Identify and maximise opportunities for high quality greenways; and*
- Work with key stakeholders and the public in identifying and developing the priority routes.*

The overall aim is to promote a pleasant and sustainable environment, and creates an attractive, safe environment that prompts more people choosing to walk, resulting in a healthier population, a more liveable and sustainable city, and stronger communities.’

Bus Transport

Core Bus Corridor Route no. 5 is identified for taking public bus travellers from Wilton to the City Centre and vice versa.

The Southern Distributor Road

Para 4.124 states that the Southern Distributor Link Road is specifically identified in CMATS as one of a limited number of new road-based projects required to facilitate the sustainable movement of people, goods and services, and to complement public transport, walking, cycling and traffic management objectives.

Para 4.125 states that the Southern Distributor Link Road is a critical component of the SDR and is a proposed new road link between the N27 and Sarsfield Road with the potential to also link to the N71 via Lehenaghmore and Spur Hill and could also provide enhanced connectivity to Cork Airport with a potential secondary access point.

Green and Blue Infrastructure

A key objective in the emerging Plan is Objective 5.24.

‘Objective 5.24: Green and Blue and Infrastructure

- a. To support the strategic role that Green and Blue Infrastructure plays in facilitating a more climate resilient city.*
- b. All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme.*

c. To support communities in the development of local scale Green and Blue Infrastructure projects.'

Figure 6.4: City Scale GBI Opportunities for Cork City does not show the greenway conversion of the former rail line. It should. It is incomprehensible that such an important piece of transport infrastructure perfectly aligned with CMATS, consistent with national cycling policy and the Cork Walking Strategy 2013-2028, which will encourage healthy lifestyles and which likely will redefine transport in the area and give a tremendous boost to tourism in the city as it has done in Waterford is not given more prominence in the plan. This greenway needs to be front and centre of the emerging plan and given at least equal billing to 'Lee to Sea'. We suspect that the Bandon to Cork greenway is not given prominence in the emerging plan, as it was in the adopted LAP, as it will redefine not just the *transport dynamic* in this part of the city to complement the roads based transport infrastructure granted under Part 8 and the provision of the southern distributor road, but will also redefine the development dynamic in the southern environs. This has not been considered adequately by the Council in respect of zoning and is a material consideration when assessing preferred locations for residential zonings.

Strategic Biodiversity

The Strategic Biodiversity Goals that are relevant to this submission are set out on page 197 and are as follows:

- '2. To ensure that sites and species of natural heritage and biodiversity importance in non-designated areas are identified, protected and managed appropriately;*
- 3. To create green and blue infrastructure network thereby creating ecological corridors linking areas of biodiversity importance;*
- 4. To implement the recommendations of the GBI study and integrate green and blue infrastructure solutions into new developments;*
- 5. To ensure all citizens are within 5km of a green and ideally wild space.'*

New Residential Neighbourhoods

Under Zoning Objective ZO 2 the following objectives apply:

'ZO 2.1 Lands in this zone are designated as Tier 1 or Tier 2 zoned lands in the Core Strategy. Any development proposals must satisfy the requirements for developing on Tier 1 or Tier 2 lands set out in Chapter 2 Core Strategy.

ZO 2.2 This zone covers primarily greenfield, undeveloped lands for new sustainable residential areas. Development in this zone, while primarily residential, must provide an appropriate mix of housing types and tenures along with the amenity, social, community and physical infrastructure required to promote compact growth, balanced communities and sustainable, liveable communities.'

In summary, as indicated further below, the rezoning sought, allied with the delivery of the greenway would satisfy all the key objectives identified in national, regional and local planning policy above including the key objectives identified in the very same Draft City Plan. It meets the requirement for delivering housing, it delivers roads infrastructure and access to adjacent sites and promotes and will utilise sustainable modes of transport at the same time, assists retention and sensitive exploitation of natural features and resources and will deliver a sustainable community with access by pleasant and healthy walk or cycle to necessary services and amenities consistent with the 15 minutes urban centre strategy.

9.0 Our Client's Case for the Residential Zoning of their Site

Having regard to the development strategy for Cork City and the achievement of wider regional and national planning policies and objectives, we disagree with the proposed zoning of our client's site as defined hinterland where there is a presumption against development.

This submission requests that approximately 14ha of land within the ownership of Ballyvolane Development Company Limited is zoned to facilitate residential development.

The current Development Plan Guidelines set out the matters that should be considered when determining the suitability of lands for zoning in the preparation of development plans as set out below and where we have added comment on the vastly understated significance of the greenway.

- 1. Need**
- 2. Compliance with Adopted and Emerging Planning Policy**
- 3. Capacity of Water, Drainage and Roads Infrastructure**
- 4. Supporting Infrastructure and Facilities**
- 5. Physical Suitability**
- 6. Adherence to the Sequential Approach**
- 7. Environmental and Heritage Policy, including Conservation of Habitats and other Sensitive Areas**
- 8. The Significance of the Greenway**

Our client's site is considered in more detail against these factors below. It is submitted that the site is appropriate for residential development and provides an opportunity to facilitate high quality homes contiguous to the existing built-up area and within proximity of Cork City Centre.

9.1 Need

The Draft Cork Joint Housing Strategy and Housing Need Demand Assessment notes that the current property market cycle has been marked by a supply/demand mismatch. Under-supply has become a serious issue, particularly in key urban areas. This has remained the case over much of the period since 2014 with new home construction remaining well below the long-term.

The strategy estimates that the total housing demand over the plan period is determined to be 17,118 households or 2,853 households per annum. It is indicated within the Draft Housing Strategy and Volume 1 of the Draft Plan neglects to identify that the southern environs and the south western sector in particular can play a role in meeting that demand within the context of Cork City as a whole.

As a location that can prioritise walking, cycling through the provision of the greenway on the former Cork Bandon Rail line the subject site would be an ideal and entirely sustainable location for walking and cycling to and within the development of the subject lands.

This site provides an opportunity to deliver high quality homes as a sustainable extension to existing development in the area to help meet an acute housing need in this area.

There is an aspect of need that is perhaps not fully appreciated by the City Council. A portion of our client's lands are already zoned for residential development in the emerging Plan. The NAMA owned lands further to the north are also zoned in the emerging plan for residential development under Zoning Objective ZO 02. That existing zoning requires the delivery of roads infrastructure that development from this zoning request will assist deliver roads for both our clients zoned lands and NAMA/Castlelands and potentially to the south and south east also.

Targets contained in the National Planning Framework, the Southern Regional Spatial and Economic Strategy, as well as very ambitious plans for sustainable transport and public transport infrastructure set out in the recently adopted Cork Metropolitan Area Transportation Strategy 2040 (CMATS) cannot be realized, including the southern distributor road, which is a key strategic objective for that regional transport strategy, without development in this location.

The only roads infrastructure required for this site is the roundabout and dual carriageway section of the N71 which has Part 8 planning permission as part of the previously completed grade separation works on the South Ring Road at the Bandon Road Interchange. It would be a 'missed opportunity' if this site were not rezoned given the in principle objection from Transportation Infrastructure Ireland (TII) to new accesses off national and regional roads. No such policy constraints exist in this location.

If the southern environs is not developed much needed infrastructure for the existing population in this area by way of roads, public transport, sanitary services and enhanced access to the airport from the city will not be achieved nor will the long proposed and supported southern distributor road (SDR). There is therefore a consequential large swathe of potential development land stretching from the Bandon Road to the N27 Airport Road.

Rezoning specifically facilitates a potential link road to the N27 Airport Road via Spur Hill and Lehenaghmore (a portion of which is the strategic public transport corridor designated as the Southern Orbital as outlined in CMATS. The link road, on its completion, would be an alternative route to the airport with the potential to alleviate some of the existing chronic traffic congestion at the Kinsale Road Roundabout Interchange during peak periods. The enhancement of access to the airport has been talked about for many years but not been delivered and ease of access to the airport would be a key requirement for developing Cork into that city of international prominence that is envisaged in the vision for the city contained within the emerging plan.

9.2 Compliance with Adopted and Emerging Planning Policy

The residential development of our client's site would be consistent with the relevant national, regional and local planning policies and guidance as demonstrated within this submission.

National policies prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. The NPF seeks to ensure that 50% of the future population will be accommodated within the cities and their suburban areas to curtail the adverse impacts of sprawling urban areas.

The residential development of this site would positively contribute to the fifteen-minute city/ walkable neighbourhood concept whereby a range of facilities and services such as employment, local shops and neighbourhood infrastructure are accessible within a 15-minute walk or cycle or trip using public transport. The development of this site would also be underpinned by recent and future public transport projects for the area including the ambitious plans set out in the Cork Metropolitan Area Transport Strategy (CMATS) and the development of the Cork to Bandon Greenway.

Compliance with the Policies and Objectives of the Emerging City Plan

The requested rezoning allied to the provision of the greenway will comply with the key elements of the **Strategic Vision** regarding compact growth with 65% of the new homes to be delivered being within the existing built up footprint when the requirement is for only 50%. This excessive figure means that housing choice is greatly reduced (ie not all people or families want to live in an apartment nr might they want to live in the city centre, within the docklands or within a designated centre. As indicated above some 364% growth in the docklands is forecast and whilst we support that focus on the docklands it cannot be at the expense of other opportunities elsewhere within the city especially when the opportunity presented by the greatly understated greenway from Cork to Bandon is considered.

The requested rezoning would facilitate the establishment of a new neighbourhood with all required services being located within a 15 minutes catchment. That 15 minute city concept can be spent cycling and walking in a very pleasant, biodiversity rich environment exploiting in only the most positive and sustainable sense the greenway much in the same way as has occurred in Waterford and in Dungarvan in particular. The use of the greenway for cycling and walking will be the ultimate in sustainable and active travel. The sustainable use of the development of the greenway will make a redefining feature of the natural heritage of the area and make it more accessible for people to enjoy and take the emphasis off the car in this location. This is the 'win-win' scenario advocated in the NPF and the Southern RSES. The requested rezoning would also provide for a diverse local economy (ie bike sales, bike repair, refreshment, coffee shop, corner shop or kiosk, toilets, meeting facilities, exhibition facilities etc to complement both the greenway and the surrounding prospective residential development. The rezoning of our client's lands as indicated above would contribute to the transition of the city a healthy city and its environs to a low-carbon climate-resilient city. It would of course help the city become for such a likely to be well known and well used greenway. The city would be well connected through the greenway with this development well connected to the immediate locality.

The development of this site would comply with the following key objectives: SO1 – Compact Liveable Growth through delivery of compact growth that achieves a sustainable 15 minute city of scale providing integrated communities and walkable neighbourhoods, and strategic greenfield expansion adjacent to existing city; SO2 – Delivering Homes & Communities through an emphasis on active transport; SO3 – Transport & Mobility through integration of land-use and transportation planning to increase active travel (walking and cycling) and public transport usage; SO4 – Climate & Environment through a transition to a low-carbon, climate-resilient and environmentally sustainable future and implementation of climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigate and adaptation; SO5 – Green and Blue Infrastructure and the protection and promotion of biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character, and manage access to green and blue spaces that provide recreation, amenity and natural areas; and finally, SO9 – Placemaking & Managing Development through a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where place-making is at the heart.

The requested rezoning is considered to be consistent with a long suite of stated objectives in the emerging plan. These include:

'Objective 2.1: United Nations Sustainable Development Goals

Rezoning in this location is sustainable.

Objective 2.2: National Planning Framework Targets

A greater proportion of development in the southern environs should be achieved to align with the National Planning Framework (NPF) to achieve the ambitious growth targets set out for Cork City and Metropolitan Area up to 2040.

Objective 2.3: National Development Plan Investment

Rezoning our client's lands will assist Cork City Council will actively support the planning, design and delivery of capital investment in the National Development Plan (NDP) and other investment programmes that maximise delivery of infrastructure-led growth, deliver compact liveable growth and climate action to make the city an attractive, diverse and resilient place to live.

Objective 2.4: Cork Metropolitan Area Strategic Plan

The provision of the greenway at Bishopstown and associated development will assist the strengthening of the role of the Cork Metropolitan Area as an international location of scale and a primary driver of economic and population growth in the Southern Region.

Objective 2.5: Regional Investment

Development will reinforce or be complementary to European and Government Exchequer funding streams for the greenway and that help deliver population and job targets, prioritise infrastructure led investment and quality of place.

Objective 2.8: The 15-Minute City

Development of our client's site will deliver the 15-Minute City delivering Compact Liveable Growth concept through a walkable neighbourhood and community with a mix of supporting uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive neighbourhood. Development in this instance will contribute to a 15-minute city and enhance Cork City's liveability in this location.

Objective 2.9: Low Carbon City

Support the delivery of a lower carbon, sustainable city where development of our client's site will avoid, mitigate and adapt to the effects of climate change while clearly protecting and enhancing Cork City's environmental assets.

Objective 2.10: Mix of Uses

Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy and enjoy the proposed greenway.

Objective 2.11: Design-Led City

Development of our client's lands will follow a design-led approach that delivers sustainable, high quality placemaking. Development will clearly contribute positively to the quality of the surrounding built and natural environment and shall be planned and designed with reference to climate change mitigation and adaptation.

Objective 2.12: Walkable Neighbourhoods

New development at this location shall be designed to make a positive addition to this neighbourhood by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.
- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).
- c. Ensuring a child friendly and age friendly environment with a mix of household types.
- d. Designing a safe place that enables access for all.

- e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.
- f. Being well-connected with easy access to public transport and active travel.
- g. Providing enhanced permeability for walking and cycling.

Objective 2.14: Neighbourhood Mix

Development of our client's site will result in a high quality neighbourhood by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities focused around a central area of open space either side of the greenway as indicated above.

Objective 2.15: Neighbourhood Design

The design and siting of development in this location shall create a sense of community and identity, enhance connectivity, incorporate creative approaches to urban design, enhance landscape character and green infrastructure and respect the local context and character of the area perfectly aligned with this objective.

Objective 2.23: Quality of Life

Development in this location will provide a very pleasant and sustainable environment resulting in a very high quality of life.

Objective 2.24: Implementing the Core Strategy

This should facilitate the development of the area around the potentially transformational provision of the greenway in this location.

Objective 2.25: Compact Growth

The objective to target the delivery of as much as 65% of all new homes in Cork City on lands within the existing built footprint of the city, is set out in the Core Strategy. We believe our clients lands that are unzoned represent the definition of existing built footprint in para 2.55 as indicated above but request special consideration of the unique sustainable development potential of this particular area presented by the greenway.

Objective 2.26: Housing Supply

There is an outstanding opportunity presented in this case to support an increase in the supply, affordability and quality of new housing in city in a unique and sustainable environment appropriate to the character of the area in which it is to be built.

Objective 2.28: Supply of Zoned Land

Housing choice should be facilitated through sufficient zoning of land in this location and that is compatible with sustainable transport and active lifestyle opportunities.

Objective 2.30: Managing the Hinterland

The rezoning requested is not unnecessary and unplanned urban sprawl which this objective seeks to prevent.

The requested rezoning would also comply with Objective 5.24 Part (b) which requires that '*All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme.*' The requested rezoning straddles both sides of the former rail line. The existing zoned portion of our clients site does not.

The proposed rezoning allied to the provision of the greenway will meet the City Council's emerging Strategic Biodiversity Goals.

There is one anomaly that we would like to point out. The portion of our client's landholding that is already zoned is contiguous to other zoned land to the north and which is taken forward as zoned land from the existing adopted LAP. However, the remainder of our client's site that is not zoned has the same characteristics as that portion that is zoned only the council has classified that land as hinterland where there is a strong presumption against development. Put another way, the lands in our client's ownership that are zoned for development are as worthy of hinterland designation as those lands that are not zoned. It seems exceptionally arbitrary to retain one part of our client's continuous landholding for zoned residential land and not to include the remainder of their landholding for zoning, especially where their lands straddle both sides of the former rail line. There is no reason to dezone our clients zoned lands given its zoned status in the adopted LAP and there is a convincing argument to rezone the remainder.

Our clients landholding as a whole and without arbitrary segmentation is consistent with Para 2.55 which has determined whether these sites are within the existing built-up footprint or are greenfield in nature and that *'Sites largely surrounded by existing development are considered to be within the city's existing built-up footprint.'* This is the case for our client's entire landholding and the greenway should also be considered as development as it is already the subject of City Council transport objectives.

9.3 Capacity of Water, Drainage and Roads Infrastructure

Our client's site is identified as Strategic Land Reserve No. 6, eastern part, known as Chetwynd, so that it is distinguishable from SLR no. 6 west identified as Ardostig in the Strategic Land Reserve Assessment undertaken for the preparation of a number of Local Area Plans.

The subsequent Site Assessment Process Update undertaken in October 2018 identified the strengths of the subject site within SLR 6 East as being:

'Development of SLR6 East may present an opportunity for development contiguous to the Sarsfield Road area, which is close to Wilton and the wider Bishopstown area. Subject to the delivery of local road improvements, upgrades to pedestrian and cycle facilities and improvements in public transport provision, development could enjoy good connectivity to Wilton and the city.'

These strategic benefits still hold good. However, it should be noted that parts of SLR4 and SLR7 are identified in the October 218 follow up assessment as being 'Premature at this time'. These sites were identified to have long term potential to contribute to compact urban growth and can be considered in future reviews of the City Development Plan. The key words here are 'long term' and "future reviews of the City Development Plan'. These comments would suggest that these sites or part of them would not come forward for development in the current review and during the currency of the emerging plan and should be no more promoted at this stage than our client's site. There are similar questions over the zoning of some land within SLR3 where infrastructural constraints were to be further reviewed and being subject to delivery of the M28 Scheme. SLR4 at Frankfield/Grange is well connected by an existing high frequency bus service but will require significant input from CMATS to facilitate further development as the existing roads network is saturated at peak periods and which would be greatly reduced by the delivery of the southern distributor road by 2031 (ie the same circumstances of our client's site).

Water

The current reservoir at Chetwynd was previously considered to be too low a level, to service development of SLR 6 east, covering the subject site, and it is considered that a new reservoir is not required to service SLR6 or these lands specifically with the provision of pumping stations on the network resolving the issue. Preliminary discussions with Irish Water (IW) involving MHL have indicated that it is feasible to serve the SLR6 lands with sufficient potable water to meet current residential density requirements. Additional investment in the network will be required and will be paid for as part of normal development contributions. A copy of the letter from Irish Water is enclosed to this effect.

Waste water

A southern trunk main sewer was considered by the County Council, during their updated SLR assessment presented to their elected members in October 2018, to be required to facilitate disposal of waste water from the development of the site and the broader SLR6 as there was considered to be insufficient capacity in the city network to accommodate development of these lands. The cost of this infrastructure was considered by the County Council to be prohibitive and was identified as not being included in the Irish Water Investment programme.

The consultant team including MHL met with the Connections and Services Team at Irish Water on 1st November 2019 at their regional offices in Mallow where it was indicated that they would provide the necessary connections to Irish Water infrastructure should the site be zoned and ultimately be the subject of a grant of planning permission. A subsequent letter was also received from the Irish Water Connections and Services Team dated 14th November 2019 which stated that any proposed connection to the Irish Water network(s) for either water or waste-water can be facilitated. For water, the letter states the connection point for drinking water shall be the 300mm watermain on the Bandon Road. For waste-water, the letter states that *'Upgrades of the wastewater network will be required to facilitate this connection. There is an ongoing project to survey, model and outline upgrades for the Cork Wastewater Network. The extent of the upgrades required will be outlined as this project progresses. Once these upgrades are identified, should you wish to have the works progressed you will be required to contribute a portion of the cost of the upgrades.'*

We re-emphasise that Irish Water has indicated that they will facilitate development of lands, including this site, through the provision of the required infrastructure, when a demand for such infrastructure is generated, and have confirmed as much in writing. As outlined in the letter received from IW (see Appendix A attached) an independent assessment of the Cork Wastewater Network is currently being undertaken and will result in the development of a waste-water model of the entire network. This letter is corroborated by an email from Irish Water dated 13th August 2021 also contained within Appendix A. This model will be used to identify upgrade works that will be required to serve the needs of the expanded Cork Metropolitan Area (CMA). The SLR6 lands form part of this future needs assessment and will deliver a solution, that as stated will require the contribution of developers to fund. In order to provide the optimum solution to serve the future needs of the CMA, it will be necessary to ensure that a sufficient quantum of development is being proposed and that the proposed upgrade works can be carried out in conjunction with other major infrastructural projects, such as the SDR, in the area. It would seem logical that the development of a southern truck sewer as outlined by Cork County Council would follow the route of the proposed Southern Distributor Road implying the timing for delivery of both should be linked and the inclusion of the SLR6 lands considered now rather than later.

The letter contained in Appendix A starts a process for IW to identify these lands as potentially coming forward for development and that can be modelled by them for such purposes.

The development of the entire land block identified as an SLR will require a new foul sewer system that Irish Water have now modelled and have a solution that will need to be funded through development. In this regard it should be noted that a site within the same SLR 6 has recently received planning permission where these same possible constraints were considered and where the Board granted planning permission for 276 houses under their reg. ref. TA28.310274 for Ardstone Developments at Ardostig and Waterford Road. This should therefore be removed for consideration as a constraint to zoning and providing homes in this area.

The advice of our client's engineers is that the development of the entire land block identified as an SLR will require a new foul sewer system that Irish Water have now modelled and have a solution that will need to be funded through development.

Surface water attenuation

As per the requirements of Cork City Council, stormwater run-off from the site will be contained to QBar levels (greenfield run-off rate). It is noted that at present Cork City Council do not have a SuDS (Sustainable Urban Drainage Systems) strategy that is to be followed in the development and design of residential schemes. However, any detailed design of a scheme will follow best practice and will be in compliance with the following:

- Greater Dublin Regional Code of Practice for Drainage Works (GDRCoP)
- Greater Dublin Strategic Drainage Study (GDSDS)
- 'The SuDS Manual (CIRIA C753,2015)
- IS EN752, 'Drain and Sewer Systems Outside Buildings'
- The incorporation of SuDS features to reduce run-off

In line with other residential developments carried out within the CMA the following SuDS strategy will be employed:

- Discharge Rate to be limited to QBAR for all rainfall events up to and including the 100-year storm event.
- Attenuation Storage to be provided up to the 100-year storm event allowing for 20% climate change.
- Hydrocarbon interceptor and silt chambers to be used upstream of each attenuation tank.
- Provision of infiltration soak-pits for areas where the 'f' values are suitable.
- Provision of interception storage by means of open swales along road edges.
- Provision of permeable paving in public areas and to form 'home-zones'.
- Provision of tree-pits at suitable locations along roads and within the Green Areas.
- Green roofs for Apartment Blocks where appropriate.

It is acknowledged that the receiving storm water system in the area is sensitive because of existing topography. A detailed flood risk assessment will be provided as part of any detailed planning application submitted to ensure that the current situation is not aggravated and that opportunities to improve the network can be explored. Similar to the proposed waste-water trunk sewer, the development of the SDR is an opportunity to provide a new storm sewer network along this route which will resolve any potential issues.

Peak hour congestion on the national and local road network proximate to these lands

The County Council's assessment of roads highlighted that the road network in the South Environs suffered from *peak hour congestion* which overflows onto the N40, a National Primary Route, which provides strategic connectivity between the N22, N71, N27 and N28, and the wider national route network. It was further stated that there is limited capacity within the existing transport network and what capacity is there needs to be allocated more efficiently to ease congestion, accommodate public transport and facilitate greater pedestrian and cycle connectivity.

As outlined CMATS has examined all transport issues, including congestion, and has set out a framework for the planning and delivery of transport infrastructure and services to support the Cork Metropolitan Area's development in the period up to 2040. The delivery of the proposed access on the N71 as part of an existing SHD application does not prejudice the delivery of the Southern Distributor Road (SDR) as proposed in CMATS and in our opinion presents an opportunity to extend this route to encompass lands that will allow the city to expand in a more sustainable manner into the future. Route selection for the Southern Distributor Road is currently being worked upon by consultants appointed by Cork City Council. It is believed they are scheduled to deliver their report before the end of the year in order to feed a more definitive objective into the new City Development Plan.

Peak hour congestion in large cities is a fact of life and is a sign of success. Congestion does force private vehicle users to sustainable transport modes. The site is adjacent to a significant greenway proposal which is a potentially redefining element of transport infrastructure for this part of the city and the city overall and will have access to the SDR and consequently enhanced public transport provided along this route. As a key feature of the city's orbital route the SDR, with development along it, the link road to the SDR will greatly enhance the prospects for enhanced bus services in the southern environs as set out in the next paragraph. Our client's lands will act as the first piece of that much needed roads infrastructure. It is estimated that there will in time be significant development within 700m of the SDR with schools, shops and amenities, already in close proximity to the subject site.

Roads Access

Vehicular access to the lands will be via a permitted roundabout on the N71, which we believe forms part of a proposed application on the NAMA controlled lands to the north. The provision of this roundabout will provide a safe and strategically important, and much needed access onto the N71, and will facilitate the TII in the provision of a dual carriageway link to the existing Bandon Road Roundabout at the N40 Interchange. In addition to providing local access to SLR 6 East, this roundabout has the potential to provide an alternative access to St James Cemetery, Chetwynd (closure of the L2451 Priority Junction on the N71) and form part of the new access route to the airport (LAP objective CA-U-04) connecting to the Togher Road (Spur Hill), the Leghenaghmore North Road and ultimately to the N27 Airport Road. This is also in accordance with the Cork Metropolitan Area Transport Strategy (CMATS) which seeks the enhanced connectivity to Cork Airport that the Southern Distributor Road could facilitate. The Southern Distributor Road which is identified as a short to medium term (up to 2031) infrastructure development in CMATS will provide dedicated walking and cycling infrastructure, to complement the provision of the greenway, and will support planned residential development in the South Environs area of the sort proposed in this instance. In these circumstances it would be a 'missed opportunity' to deny rezoning in this instance.

Greenway/Improved Connectivity

The site has the potential to be served by the proposed 'Greenway' on the old Bandon Road Railway Line which runs between the plots of land and which continues eastwards towards the Tramore Road within the confines of the extended city boundary. With the development of the zoned lands to the north of the subject site, pedestrian and cycle access to Dunnes Stores and to the N40 Cycle/Footpath network will be available. Pedestrian /cycle access to the adjoining residential estate to the west 'Eagle Valley' will also be provided. This is in accordance with CMATS which identifies the provision of this greenway. What more unique an amenity in Cork and attractive pedestrian and cycle access could there be to serve and stimulate development than to reopen the rail line for such purposes?

The proposed reuse of the abandoned rail line for pedestrian and cycle access is consistent with not only Objective CL-U-13 of the Ballincollig Carrigaline MD LAP 2017 but is also consistent with the Cork City Cycle Network Plan. This amenity would provide a strong and central cycle and pedestrian spine through development in the southern environs as envisaged in national and regional planning policy and guidance. It should receive due prominence in the emerging plan and should receive equal billing to the 'Lee to Sea' greenway as it only has indirect reference in Table 4.3 and is an adopted transport objective for the statutory LAP for the area until such time as the emerging City Plan is adopted. The Bandon Cork Greenway deserves its own entry into Table 4.3 of the emerging plan.

9.4 Supporting Infrastructure and Facilities

The Development Plan Guidelines state that consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, healthcare, schools, public open space, retail and other service provision and public transport when allocating land for development.

Our clients' lands at Garranedarragh are well located with convenient access to community facilities and services. These services, facilities and amenities are identified in text and visuals in Section 4.0 of this submission.

The estimated yield of children of school going age from potential development of the site can be accommodated within the capacity of existing primary and secondary schools. Falling enrolment has been identified for a number of secondary schools within the catchment of the subject site. Capacity exists within existing primary schools and a new Educate Together National School at Coláiste Stiofán Naofa on the Tramore Road, and the principal there confirms that their capacity will be further increased over the coming years. A pleasant, safe and direct pedestrian and cycle route using the proposed greenway, consistent with a local objective for achievement of same, will take children to this new primary school on the Tramore Road.

Bishopstown, was once and still is a thriving suburb of Cork City and should remain so and the greenway offers an unrivalled opportunity for further investment there. It should not exist in the shadow of substantial development and investment in Ballincollig. As indicated above the south west environs is particularly under-represented in population projections for the city as indicated in Figure 10 above which is taken from Table 2.2 of the emerging plan.

9.5 Physical Suitability

The proposed development of our client's site would make efficient use of existing and committed infrastructure in the area including public transport and wastewater services.

In terms of physical suitability, there are no known constraints to the development of this part of our client's landholding. As stated elsewhere the zoning of the subject site and consequential development would make use of the proposed greenway.

9.6 Adherence to the Sequential Approach

The Development Plan Guidelines state that zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes, such as our client's site, being given preference. Areas to be zoned should be contiguous to existing zoned development lands.

Our client's site at Garranedarragh is contiguous to zoned lands and surrounded by established development to the north/ north east and west of the site. As indicated above, the site is very accessible and proximate to services and facilities that support residential development. The nearest bus stop is located just 600m, a short walk, away.

Our client's site is sequentially preferable to more peripheral zoned sites throughout Cork City and the opportunities presented by such sites must be maximised in accordance with national guidance.

9.7 Environmental and Heritage Policy

There are no flooding issues or known environmental issues or significant biodiversity sensitivities associated with our client's site. In fact, there is a substantial biodiversity gain from retaining the redundant green way and utilising it, in a sensitive manner, for soft modes of transport. Part of the attraction of greenways is not just the opportunity for healthy activities and active tourism, and carbon neutral modes of transport but also the exploration of biodiverse rich green infrastructure corridors.

9.8 The Significance of the Greenway

Direct and high quality pedestrian and cycle access would be provided through the greenway from the Bandon Road to the Tramore Road and the large public park located there if the subject site is zoned for residential. The same ancillary retail, community and leisure facilities normally permitted under a ZO 02 zoning objective could also provide amenities for those passing through on their bicycles or who are visiting the area and beyond as tourists.

Objective CL-U-13 is an objective contained in the adopted LAP for the area and this should be carried through into the Draft Plan in Table 4.3 and consequently be given far greater prominence in this emerging plan. There is significant reference to the Lee to Sea Greenway but not the Greenway associated the former Cork Bandon Rail line.

The historic route of the Cork Bandon is shown below in Figure 12 below taken for the period 1837-1842. It is also shown in the same figure with reference to the other proposed Lee to Sea Greenway and rail lines that were operational during that period. The subject site is signified with a red dot.

Figure 12: Proposed Greenways on Former Rail Route 1837-1842



The location of the site in the context of built up and modernised Cork City is shown in Figure 13 below. The site is marked with a red dot.

Figure 13: Potential Greenway Route over the Former Cork Bandon and South Coast Railway Line

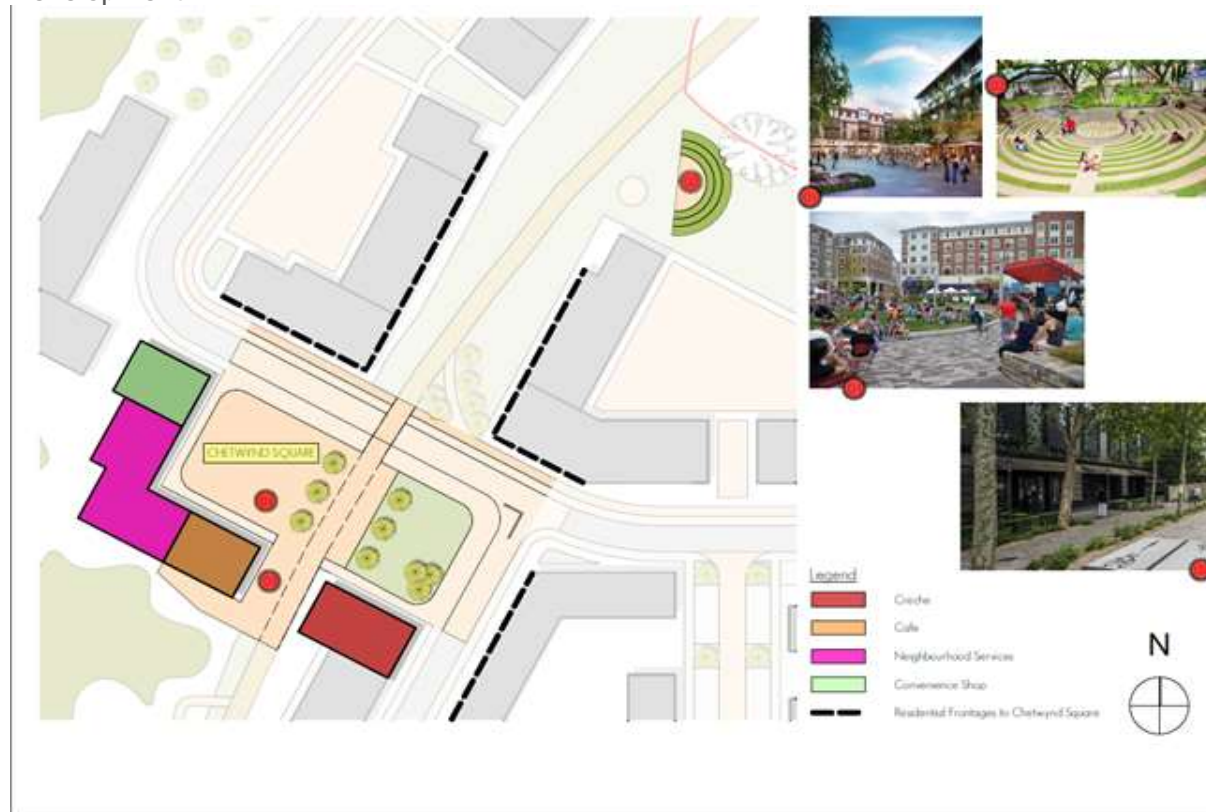


In this location it is our view that the three fields in our client's ownership that are north of the rail line represent an opportunity for infill development and that could be developed for a mix of residential and support services that would meet the needs of any newly established local community and also the needs of tourists that would wish to use the greenway. This location with support services such as rest area for walkers, hikers and cyclists and coffee shop, bike hire or repair could be considered the last stop of the first stop in Cork City depending on the direction of travel. From the above Figure 13 this would be the ideal location with ample space for such an amenity which would also assist supporting a range of facilities for prospective residents.

If the subject site is zoned residential it would be our client's intention to have provided a neighbourhood centre. The neighbourhood focus of the residential development on site would be an urban space located within the greenway at grade with the surrounding lands, potentially enclosed with residential buildings of three and four storeys, with the square being traversed by the greenway and the street connecting the northern and southern residential areas. This neighbourhood area is linked to extensive use of the greenway which will link the Bandon Road to the Tramore Road.

Figure 14 shows how the greenway would run through the neighbourhood centre of future residential development and act as the green and sustainable focal point for which there would be a civic area or public square provided.

Figure 14: Indicative Layout for Neighbourhood Centre serving the Immediate Residential Development



Any development following rezoning would be centred on the proposed greenway. The layout would be designed to ensure passive surveillance of the greenway, and where appropriate green active and passive amenity spaces adjoin it such that it becomes a stopping point or resting point and service location for the linear park.

An indication of how the site could be developed following rezoning is presented in Figure 15 below showing a unique, high quality development (a unique sustainable urban community) with the greenway as its centrepiece.

10.0 Conclusion

The portion of our client's site that is not zoned for development, in concert with that portion that is zoned for development offers an unparalleled development opportunity that is unmatched along any other part of the proposed Cork to Bandon Greenway. The requested rezoning would not only be consistent with the existing zoning but would also provide much needed housing and provide very significant and very exciting opportunities for tourism related development along the proposed greenway.

Our client would welcome the opportunity to discuss any of the above request in further detail with Cork City Council.

If any further information is required, please do not hesitate to contact us.

Ken Manley
10 High Street
Douglas Road
Co. Cork

14 November 2019

Dear Ken Manley,

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Irish Water
PO Box 448,
South City
Delivery Office,
Cork City.

www.water.ie

**Re: Connection Reference No CDS19006494 pre-connection enquiry -
Subject to contract | Contract denied**

Connection for Housing Development of 1,500 unit(s) at GARRANDARRAGH, BISHOPSTOWN, CORK.

Irish Water has reviewed your pre-connection enquiry in relation to a Water & Wastewater connection at GARRANDARRAGH, BISHOPSTOWN, CORK.

Based upon the details that you have provided with your pre-connection enquiry and on the capacity currently available in the network(s), as assessed by Irish Water, we wish to advise you that, subject to a valid connection agreement being put in place, your proposed connection to the Irish Water network(s) can be facilitated.

Water:

The connection point for the drinking water shall be the 300mm watermain on the Bandon Road.

Wastewater:

Upgrades of the wastewater network will be required to facilitate this connection. There is an ongoing project to survey, model and outline upgrades for the Cork Wastewater network. The extent of the upgrades required will be outlined as this project progresses. Once these upgrades are identified, should you wish to have the works progressed you will be required to contribute a portion of the cost of the upgrades.

Strategic Housing Development

Irish Water notes that the scale of this development dictates that it is subject to the Strategic Housing Development planning process. Therefore, in advance of submitting your full application to An Bord Pleanála for assessment, you must have reviewed this development with Irish Water and received a Statement of Design Acceptance in relation to the layout of water and wastewater services. Please submit your design to CDSDesignQA@water.ie.

All infrastructure should be designed and installed in accordance with the Irish Water Codes of Practice and Standard Details. A design proposal for the water and/or wastewater infrastructure should be submitted to Irish Water for assessment. Prior to submitting your planning application, you are required to submit these detailed design proposals to Irish Water for review.

You are advised that this correspondence does not constitute an offer in whole or in part to provide a connection to any Irish Water infrastructure and is provided subject to a connection agreement being signed at a later date.

A connection agreement can be applied for by completing the connection application form available at **www.water.ie/connections**. Irish Water's current charges for water and wastewater connections are set out in the Water Charges Plan as approved by the Commission for Regulation of Utilities.

If you have any further questions, please contact Brian O'Mahony from the design team on 022 52205 or email bomahony@water.ie. For further information, visit www.water.ie/connections.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M O'Dwyer'.

Maria O'Dwyer

Connections and Developer Services

From: **Tadhg Coffey** <tadcoffey@water.ie>
Date: Fri, Aug 13, 2021 at 10:21 AM
Subject: FW: CDS19006494 Bishopstown 1,500 units
To: Ken Manley <kmanley@mhl.ie>

Hi Ken,

Further to recent enquiries seeking an update on the previous confirmation of feasibility (COF) which was issued under the above reference, I wish to give you an update on the modelling work being undertaken by Irish Water as part of the Cork City Drainage Area Plan (DAP) which will supplement this COF.

The DAP is almost reaching end of Stage 2. RPS is commissioned to prepare an infrastructure plan this year so the upgrades for site in question will be identified through that at end of year/early next year.

Please contact me again if you require further information.

Regards,

Tadhg

Tadhg Coffey

Connections & Developer Services Regional Manager - Southern Region

Uisce Éireann

Teach na hAbhann Móire, Páirc Ghnó Mhala, Mala, Contae Chorcaí, Éire

Irish Water

Blackwater House, Mallow Business Park, Mallow, County Cork, Ireland

P: +353 22 52247

M: +353 86 8882662

E: tadcoffey@water.ie

www.water.ie

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Thank you for your attention.

Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimiscthe agus féadfar é a bheith neamhdhleathach. Níl Uisce Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Uisce Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl Uisce Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire. Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdaráithe. Ní ghlacann Uisce Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairachtaí chuig nó ó Uisce Éireann chun comhlíonadh le polasaithe agus le caighdeáin Uisce Éireann a chinntiú agus chun ár ngnó a chosaint. Fochuideachta gníomhaíochta de chuid Ervia is ea Uisce Éireann atá faoi theorainn scaireanna, de bhun fhorálacha an tAcht um Sheirbhísí Uisce 2013, a bhfuil a bpríomh ionad gnó ag 24-26 Teach Colvill, Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.