

**MIDLETON ELECTORAL AREA LOCAL AREA PLAN  
AND DRAFT MASTER PLAN FOR CARRIGTWOHILL NORTH,  
CARRIGTWOHILL  
BOTH PUBLISHED NOVEMBER 2010**

**Submission of Carrigtwohill Community Council**

**Context**

The unique nature of Carrigtwohill in the context of the Midleton Electoral Area Local Area Plan and indeed in the county is something which stands out clearly from facts and figures published in the abovementioned Draft Plans.

In the period from 2002 to 2006, Carrigtwohill experienced the single largest percentage growth of any town in the county when it grew by an alarming 97%. The population of Carrigtwohill in 2002 was 1,411. In 2006 it was 2,782.

It is now proposed that, in the period up to 2020 Carrigtwohill would grow to a total population of 12,012. The overall growth in the Carrigtwohill area therefore in the period from 2002 to 2020 is 10,601 people or 750% increase on the original population in 2002. To the best of our knowledge there is no other town in Cork County to which this type of figure applies. Indeed one would struggle nationally to find an equivalent.

For this reason Carrigtwohill deserves special attention and merits special consideration in relation to the appropriateness of applying some general planning guidelines and policies and this submission requests Cork County Council to give serious consideration to deviation from standard policies to acknowledge the non-standard circumstance which arise in the context of Carrigtwohill.

During the period of growth of Carrigtwohill (2000 to date), some very significant new planning policies have emerged including;

- South Western Regional Planning Guidelines 2004 which require much higher densities than applied previously.
- The Cork Area Strategic Plan (CASP).
- CASP Update. The CASP Update which projected population growth for the CASP region including Midleton Electoral Area was carried out at the height of the economic boom. This document identified the required increase of 818 units in the Carrigtwohill area. In the light of the changed economic circumstance of this country which have required emergency and extraordinary legislation and the significant numbers of people emigrating, the requirement for these additional units must surely now be questioned and a sensible approach in relation to the interpretation of those figures must be taken.
- Planning and Development Act, 2000 (Part V).
- Joint Housing Strategy Cork County Council and Cork City Council.

We would refer you to our comments with regard to these below under the heading of Social and Affordable Housing.

## **Challenges**

The LAP in relation to Carrigtwohill sets out the vision and context as follows;

*“The overall aims for Carrigtwohill are to realise the significant population growth proposed, to maximise the value of the suburban rail project, grow the employment base of the town as a key location for the delivery of economic targets for the whole of the metropolitan area, and build a vibrant and accessible town centre that provides for the needs of the expanding community, while retaining the unique character and community spirit of the town.”*

This vision and context is admirable but we would have grave doubts that the Plan as currently drafted can possibly achieve this vision, not least because of the fact that the character of Carrigtwohill is entirely changed by virtue of the new development by which it has been engulfed.

Notwithstanding this, it is essential that the vision is maintained and that every effort is made to mitigate the damage to the character and unique spirit of the community. The extraordinary growth proposed for the Carrigtwohill area presents the community with a number of challenges as follows:-

1. Integration of new community.
2. Retention of character of existing community.
3. Dealing with deficit in social and amenity facilities.
4. Dealing with deficit in community facilities.
5. Dealing with deficit in infrastructure.
6. Difficulties arising from disruption from construction traffic.
7. The difficulty arising from a disproportionate part of the population residing in higher density accommodation (see below).
8. Disproportionate quantity of social housing (see below).

## **Existing Infrastructure**

Paragraph 4.7 of the Draft Master Plan recognises that the development of the site will require significant investment in roads infrastructure. It cannot, however, be assumed that the infrastructure required is within the area of the Master Plan. The infrastructure required to serve the Master Plan Area extends to the greater Carrigtwohill Area and this is something which has been overlooked time and again by Cork County Council and can no longer be overlooked.

We have studied the Midleton and Carrigtwohill Traffic and Transportation Plan and noted with considerable regret that much of the “solution” put forward comprised only of the development of new roads within the newly developed area. There was very little focus on the existing deficiencies serving the existing community and no proposals at all to deal with them in the absence of new development.

The deficiencies in the infrastructure have been acknowledged since we first commenced interaction with Cork County Council Planning Policy Unit following their invitation to make a submission to the 2003 Development Plan. This interaction has arisen since 1998 and still some particularly obvious deficiencies have not been dealt with as follows:

- Junction of Main Street and Church Road – Notwithstanding the deficiency at this junction a further planning permission has now been granted by Cork County Council in the area zoned for town centre development. While we welcome town centre development at this location we strenuously oppose the adding of further traffic in or around this area until this junction has been completely and comprehensively upgraded
- Provision of off street car parking – Whilst the development permitted provides some off street car parking this permission is under appeal and the provision of this parking cannot be assumed. It is incumbent upon Cork County Council to provide car parking in the interim.
- Through Road at Castlflake leading to Station Road – This road was conditioned as part of the planning permission for this development by An Bord Pleanála. The planning permission specifically stated that the road had to be completed as Phase 1A of that development. Notwithstanding this, further Phases were permitted by Cork County Council and were allowed to be developed without this condition being fulfilled. The failure by Cork County Council to insist upon completion of this road has;
  - led to significant traffic congestion in the Carrigtwohill area and
  - has undermined the confidence of citizens and the willingness and ability of Cork County Council to enforce such conditions and strengthens the resolve of the local community to insist upon the completion of infrastructure ahead of developments
  - Resulted in the ridiculous situation of the Railway station being inaccessible to much of the new population in the Castlflake development.

Several letters have been written by Carrigtwohill Community Council Enforcement Section and the matter has been raised with Councillors. No response let alone a satisfactory response has been received from Cork County Council in relation to their failure to insist upon fulfilment of this condition.

- The proposed interchange at the Amgen site is welcomed. However any further significant development of the Carrigtwohill area must be contingent upon the provision of this interchange.
- The Middleton and Carrigtwohill Transportation Study proposes the closure of the slip road from the east end of Carrigtwohill on to the N25 and the closure of the slip road at Barryscourt off the N25. No such closures should be even contemplated without the interchange at Amgen being fully completed and operational.
- Only when the Barryscourt slip road is closed and further land is available to provide a one way traffic system or alternative street structure to accommodate the town centre, T01 can the traffic issues facing the existing town centre be dealt with.
- Whilst there are further considerations in relation to the deliverability of this new proposed street structure, the provision of the “Amen interchange” simply must be a priority for Cork County Council. We would submit that a condition is included in the Master Plan to provide that planning permission shall not be granted by Cork County Council for any more than a further 500 units within the Carrigtwohill area unless that interchange is first put in place and the street infrastructure in the new town centre is operational.
- Carrigane Road – Developments at Fota Rock and CulArd were permitted and, as anticipated, occupied by young families. Young children are walking to school on a road which is highly dangerous and which has no footpath. Cork County Council’s failure to provide the footpath in tandem with those developments presents a very substantial risk to health and safety of road users and, in particular to pedestrians and cyclists and is disgraceful. It offers a further example as to why there can be no confidence in the ability or willingness of developers or Cork County Council to deliver infrastructure once development is constructed. If infrastructure is not in place ahead of or in tandem with development there can be no certainty that it will ever be provided. Like the Castl lake through road experience, the Carrigane Road experience has undermined the confidence of the community in the commitment of Cork County Council to provide the infrastructure to support the development it so strongly promotes in Carrigtwohill.
- Pedestrian Facilities and Cyclists Facilities – To-date none have been provided by Cork County Council. Carrigtwohill Community Council has provided a footpath leading from the IDA Estate to Tullagreine junction with the financial support of Cork County Council. However the experience of Carrigtwohill Council in dealing with certain departments of Cork County Council was most unsatisfactory and further support for community sponsored amenity provision should be forthcoming from all officials of Cork County Council.

### **Waste Water Treatment Plant**

It is noted that the quality of water currently discharging into the tide at Slatty is sub-standard although responsibility is not openly acknowledged by Cork County Council. It is noted that an upgrade is proposed but approval is still awaited as well as financial support from the Department of Environment Heritage and Local Government. In the current climate this cannot be assumed and Cork County Council should clarify the

capacity of the existing waste water treatment plant and clarify the number of further units (if any) which can properly be accommodated by the existing plant. The Plan should provide that pending provision of that waste water treatment plant no more than the specified number of units can be permitted.

### **Flooding/Storm Water**

It is clear that much of the land zoned for development is subject to flood risk. The requirement for flood risk assessment is welcome as the requirement generally for attenuation measures. However it is essential that existing flows from green field sites are measured and records maintained so that parties who might be affected by failure of the attenuation measures and independent interested third parties can assess compliance with those attenuation measures.

The failure to conduct adequate assessment of existing flows and therefore to assess the capacity of the attenuation measures was demonstrated in the serious flooding which took place in Castlelake in 2010. The ground floor of the 4 storey block under construction was badly flooded. In all of the Submissions we made in relation to the development of that site we highlighted flooding as an issue. The local knowledge and flooding experience of the site was clearly set out by us to Cork County Council but, we would submit, was not given any proper regard. Local experience would suggest that large tracts of the masterplan area are prone to flooding and are not suitable for any form of development of meaningful community provision.

### **Development Contributions and Rates**

We submit that there is an obligation upon Cork County Council to expend the monies received from development contributions and rates in the Carrigtwohill area principally within the Carrigtwohill area. The challenges facing this community have been outlined above. Carrigtwohill is required to accept this extraordinary level of development in the interest of the county as a whole. It is fair therefore and necessary that sufficient money is applied towards the provision of the infrastructure. The costs associated with the provision of the necessary infrastructure should be properly assessed and reflected in the Development Contribution Scheme and a commitment is required in relation to spending that money in the Carrigtwohill area to mitigate the impact of the development on the local community.

### **Compulsory Purchase Orders**

Cork County Council has powers to use compulsory purchase orders for the acquisition of land necessary to provide infrastructure. It is incumbent upon Cork County Council to use those powers in particular to deal with junction deficiencies and requirement for through roads.

### **New Infrastructure**

Castlelake through road – See comments above in relation to the urgent need to complete this road and, in order to restore the confidence of the community, an explanation as to why the road has not been completed to-date despite the further development which is permitted.

## **Northern Relief Road**

It is suggested that this should be of minimum width in order to reduce speed. However the width should be sufficient to accommodate two passing heavy goods vehicles so that those vehicles are encouraged to avoid the town centre. The northern relief road must have provision for footpaths and cycle paths.

## **Density**

The document entitled “Urban Design Manual, a Best Practical Guide” issued by the Department of Environment Heritage and Local Government December ’08 sets out some core principles including development “*which respects the context of the existing community and the integration with the surroundings.*”

The swallowing up of the existing town in a new development more than 7 times the original size simply does not respect the context of the existing community. Neither does it strengthen the local community but rather imposes challenges which Cork County Council has an onus to assist in overcoming.

The Guidelines on Sustainable Residential Development in Urban Areas require the efficient use of land in high quality urban design with effective integration in provision of physical and social infrastructure to create places where people want to live.

Cork County Council must have regard to the density guidelines contained within those Guidelines but must also have regard to the requirement to “*create a place where people want to live*”.

Cork County Development Plan recognises that a flexible approach to density is required in some cases. We would respectfully submit that Carrigwohill must be considered for this flexibility in view of the huge proportion of the development which is now taking place when these Guidelines are effective. There is no comparison with other towns which were well established before these density Guidelines became effective and which will therefore have substantial areas which are subject to lower densities creating a balance which would be absent in the Carrigwohill area if the density Guidelines are strictly enforced.

The Master Plan provides that the strategy of Cork County Council is to maximise higher density within a 400 metre radius of the railway and that elsewhere densities should graduate towards the periphery. We would submit that the strategy should not be to “*maximise*” densities but rather to achieve higher densities in those areas.

The Plan provides that medium density is deemed to be 30 to 50 dwellinghouses per hectare. We would respectfully submit that in large areas of Carrigwohill the density should be at the lower end of the scale (30 to 35 dwellings per hectare).

High density development is generally not the preferred residential choice for most people outside of city areas. We would submit that there is no part of the Carrigwohill area that should be subject to high density although areas within 250

metres might be considered for the higher end of the medium density scale. Having regard to the DoEH& LG Guidelines to “*create places where people want to live*” this must be considered.

During the public consultation process leading to the development of the land at Castl lake, we pointed out the fact that there was no market for high rise apartments in Carrigtwohill and pointed to the risk that they would remain unoccupied or incomplete. This risk has materialized. Despite this, it would appear that there is a refusal to learn lessons from previous experience and the insistence on including provision for significant quantities of development of blocks of 4+ levels is extraordinary and offensive.

On page 6 site coverage provision is targeted at 65%. This is particularly high given the previous site coverage of 20%.

### **Social and Affordable Housing**

Most towns around Cork County have grown organically. Carrigtwohill on the other hand has simply mushroomed. The organic growth of most towns has meant that only small areas of the towns have been development while Part V of the Planning and Development Act 2000 (Part V) has been operational. Far less than 20% of those towns therefore will be occupied by social and affordable housing. On the other hand most of the development in Carrigtwohill has taken place subject to this legislation and therefore a percentage of housing in Carrigtwohill which would be social and affordable will be much closer to 20%.

Added to this is the fact that the provision for social housing has been increased in the Cork County Council and Cork City Council Joint Housing Strategy and the requirement for a 50% social and 50% affordable is quite new. We submit that it is not intended that it would govern entire towns but rather organic extensions to towns. The Plans estimate 500 social houses in Carrigtwohill. By 2020 it is estimated that there will be 6,051 units in Carrigtwohill 500 of which will be occupied as social housing. The percentage of social housing therefore will be in the region of 8.2%.

If one takes Youghal as an example and applies the equivalent figures the percentage occupied by social housing would be 3.4%. In Cobh it would be 3.8%.

The Joint Housing Strategy 2009 provides at Policy 2.1 that, in the interest of developing sustainable communities the Cork Local Authorities will ensure that there is appropriate balance between social /affordable and main stream housing provision within communities. It sets out proposed actions as follows;

- (a) within the Cork metropolitan area 50% of Part V houses will be social subject to exceptions and subject to review in future Development Plans.  
It is notable that in Cork City the percentage is 25%.
- (c) In certain specified areas within the county where there is an existing high concentration of social housing or where it is perceived that no social housing demand there will be a lesser amount required or no requirement for social housing. Such areas will be identified in the first instance in housing action

plans and will be reflected in future Development Plans objectives or Local Area Plan objectives where appropriate.

It is imperative that an objective for a lower percentage is provided in the Carrigtwohill area and if necessary a housing action plan prepared for this purpose.

- (e) in all other areas (viz. outside of the Cork Metropolitan area) the percentage for social housing is to be agreed with the Planning Authority subject to a maximum of 50%. However this maximum is applied in all cases in Carrigtwohill.

The Joint Housing Strategy also has other relevant policies as follows:-

2.3 (c) to seek to build sustainable communities by addressing any deficits in the provision of social and community infrastructure within established residential areas. This has not been addressed in Carrigtwohill.

4.3 – Cork Local Authority will seek to maximise the provision of social infrastructure to residential areas and suggest as a proposed action the adequate provision for community facilities and essential services such as schools, shops, health centres, etc. The deficiency of the Local Area Plan and Master Plan in this regard is highlighted below.

### **Sports and Leisure**

The Plan acknowledges the requirement to zone a sports and education campus. In the context of the increase in population projected for Carrigtwohill the provision is totally inadequate.

The Master Plan at paragraph 4.5 acknowledges that a new 20 hectare sports and education campus is required. It then goes on to state *“the proposed campus layout provides for just under 16 hectares and although that represents a shortfall required on the 20 hectare provision, current guidelines advocate quality over quantity in provision of open space and so the high quality design in this case is considered sufficient to offset the deficit.”* This, with respect, is utter nonsense. Where sports pitches are required to deal with the demands of a large population, the quality cannot make up for the lack of quantity.

The existing GAA complex comprises 7 hectares. This is struggling to meet the needs of the existing community for GAA facilities only. It is a nonsense therefore to suggest that an area of 16 hectares would be sufficient to accommodate two schools and to meet the sporting and recreational needs of a population 7 times the original population and 3 ½ times of the existing population. This gross under provision breaches the relevant Guidelines and flies in the face of the so-called “vision” for Carrigtwohill. It undermines the credibility of the entire Plan and the commitment of Cork County Council of any regard to the existing community and new community and any community spirit that might exist now or into the future.

A functioning community requires adequate community and social provision. This is recognised by the Guidelines issued by the Department of the Environment Heritage

and Local Government as well as in the Joint Housing Strategy of the Cork Local Authorities. The provision of 16 hectares is totally insufficient. When the areas required for the schools is extracted the remaining area would be somewhat smaller than the existing GAA facility.

The Plan acknowledges that there will only be two pitches provided as well as an astro-turf facility. The current population of Carrigwohill is 2,782 (2006 Census). This population is not adequately catered for with the existing 3 GAA Pitches and 1 soccer pitch. A projected population of 12,012 people simply cannot be accommodated by the provision of two further pitches only. These 2 pitches are supposed to provide additional GAA facilities as well as pitches for other sports such as soccer and rugby!

The minimum area of land required to be reserved would be 25 hectares.

The suggestion that childcare facilities would be provided within the community hall needs to be re-examined as generally for reasons of health, safety and hygiene the two uses may not be compatible.

The Plan also suggests that allotments (which are welcome in principle) would be taken out of the already inadequate public open space provision. This is not acceptable.

There is reference to a linear park along the rail line to serve as an amenity area but it is noted that the real purpose of the linear park is the reservation of the land for a future additional rail line. This land should not be included in the calculation of open space provision in view of the fact that its real long term function is not to be retained as open space.

### **Character Area Approach**

The challenge presented to Cork County Council by the fragmented ownership of the land in the Master Plan area is acknowledged but unfortunately does not appear to have been overcome. Indeed there are contradictions in the Master Plan itself. Paragraph 5.1 provides that each landowner can apply for planning permission on his own holding whereas paragraph 6.8 requires planning applications are treated by way of single comprehensive planning applications in respect of each character area.

By way of general comment we would submit that the density in the case of each of the character areas is inappropriately high and should be reduced so that the highest density would be 40 units per hectare and that in other medium density areas the target would be 30 to 35 units per hectare. Apart from one small area (Area 8) there is a notable absence of any low density development. The Local Area Plan acknowledges the requirement for individual housing within town boundaries to assist the Council in preserving greenbelt areas. It is suggested that this is overcome by zoning certain lands for individual housing. There is a total absence of such zoning in Carrigwohill and this needs to be addressed.

While some 3 storey development might be appropriate provision must also be made for 2 storey developments for which there is maximum demand. The experience in

the Castlelake development where by the 5 storey apartment block developments for which there is absolutely no demand and remain incomplete surely provides a lesson to Cork County Council and indeed to central government in relation to the suitability of density guidelines in areas such as Carrigtwohill. We would respectfully submit that there should be no further 5 storey development within the Carrigtwohill area. People simply do not want to live in such developments in areas such as Carrigtwohill and this must be acknowledged. In certain exceptional circumstances 4 storey development might be acceptable subject to high quality design.

## **Implementation Strategy (Section 6 Master Plan)**

### **Phasing**

Paragraph 6.3 includes as an ideal that occupation of dwellings constructed in a latter phase may not occur until all of the required facilities and infrastructures in a previous phase had been completed. The reference to occupation should be changed to provide that no further dwellings shall be constructed in the later phases until the infrastructural provision is completed in the earlier phases. Surely Cork County Council has learnt lessons from several developments (examples can be given if necessary) where conditions applicable to the occupancy of units which are completed are totally ignored.

The Phasing Programme appears to lack any sense and requires that construction commence at the outskirts of the Master Plan Area (Areas 1a and 1b are at the outer extremes of the Masterplan area) rather than adjoining existing development. No rationale for such departure from the normal practice is furnished.

The essential and urgent community and recreational facilities are to be developed only as part of Phase 2A. This suggests that, including the units in Phase 2A a further 2,260 units could be constructed before these facilities are provided. This is totally unacceptable and the social and community facilities must be included as Phase 1A or at the latest Phase 1B.

Similarly the provision of primary and secondary school are included in Phase 1C by which time there could be a further 1,940 units. The existing facilities simply will not accommodate such additional dwelling units in the meantime. There is a particular urgency for a further second level school to accommodate boys. The secondary school needs to be part of the earliest phase and needs to be located in a land which is readily serviceable and accessible.

Paragraph 6.4 refers to the monitoring and review mechanism. There is no provision for local consultation and this needs to be corrected.

Paragraph 6.5 sets out the financial requirements. As outlined earlier the costings need to be properly undertaken and appropriate contributions collected under the Development Contribution Scheme so that there is no risk of Cork County Council not being in a position to provide the necessary infrastructure.

## **Points Specific to Local Area Plan**

The Local Area Plan designates Carrigtwohill, Cobh, Midleton and Youghal as the main towns and suggests that they will each have the following facilities:

- Benefit from the highest levels of existing infrastructure and services

This is not satisfied in Carrigtwohill

- Significant choice of convenience and comprehensive shopping (not in Carrigtwohill)
- Public library (not in Carrigtwohill)
- Significant visitor facilities, hotels and Bed & Breakfasts (not in Carrigtwohill)
- Bank (not in Carrigtwohill)
- Traffic calming/management scheme/off street car parking (not in Carrigtwohill)
- Green site/recycling facilities (not in Carrigtwohill).

It is noted at paragraph 2.2.8 that Carrigtwohill and Midleton have been designated as developing areas by the DoEH& LG and there is an objective to deliver the necessary social and physical infrastructure in a coordinated manner and to facilitate sustainable development of these areas. We would respectfully submit that neither the Local Area Plan in its current format or the Master Plan for the Carrigtwohill area meets with this requirement.

Paragraph 2.2.10 provides that the Water Rock Master Plan requires provision of 2,500 new houses in that area while the Carrigtwohill Master Plan requires 2,600 units. Both of these areas are within the Parish of Carrigtwohill and while in town planning terms Water Rock is considered to be in the Midleton area, in terms of interacting communities, Water Rock is still very much part of the Carrigtwohill Parish. The overall change in character is therefore further highlighted by the Water Rock growth area.

Paragraph 2.2.12 acknowledges that in the period of 2002 to 2006 the overall growth in the Midleton Electoral area was 17% and that Carrigtwohill was “best performing” by virtue of its growth of 97%. The next closest area was Midleton at 26%, Cobh at 15% and Youghal at 3%.

The projected growth figures to 2020 show Carrigtwohill growing by a further 332% (overall 750%). The next closest is Midleton at 136%.

The LAP therefore highlights the failure of the Local Authority to ensure the provision in Carrigtwohill of the facilities which are normal for main towns. It is

noted in the draft LAP that, of the 4 main settlements. Carrigtwohill alone does not have a town council of its own.

Questions arise as to whether the fact that Carrigtwohill, relative to other towns, has fared so badly out of the series of Development plans and Local Area published over the past 10 years is connected to the fact that there is no town council looking after the specific requirements of the Carrigtwohill area. This may need to be addressed.

### **LAP – Specific clauses in relation to Carrigtwohill**

Paragraph 1.2.3 – It is acknowledged in the LAP that the main street village character “jars” with the new estate style. The Plan blames the palette of finishes and lack of distinctive areas. Responsibility for this lies with the Local Authority for the failure to ensure that the growth was planned and designed, sequenced and phased in a manner which prevented that jarring. We have raised this as an issue in submissions made since 1998.

Paragraph 1.2.3 acknowledges a vacancy rate of 3% in the area and a substantial bank of planning permissions not yet implemented.

Paragraph 1.2.7 suggests that a requirement of 818 more units than was anticipated in 2005 is now required by 2020 arising from the revised CASP figures. We would reiterate our question as to the applicability of those figures in the context of the new economic conditions. In the event that Cork County Council still believes that the greater population figures must be accommodated, we would plead with the Council not to achieve same by virtue of unnecessary and undesirable higher density.

### **Public Transport**

The opening of the rail line is very welcome. However practical measures need to be implemented to ensure that there is greater usage of the train including better accessibility by car and by foot. The junction at Main Street/ Church Road must be a priority to open up access to the railway. The provision of adequate footpaths and lighting and a pilot shuttle bus scheme should also be considered.

The sense behind the introduction of car parking changes with the introduction of the trains needs to be questioned and reviewed as it is quite clearly acting as a bar to the use of the train.

Paragraph 1.4.4 refers to Midleton and Carrigtwohill Traffic and Transportation Study and acknowledges that implementation of the Study is key to unblocking rejuvenation and expansion of the town centre. It listed the key recommendations and, as outlined above, priority must be given to the Amgen interchange or the other changes cannot occur in advance of that.

### **Industry**

1.4.20 – The retention of the Amgen site for large scale industry of national and regional importance is welcomed.

The zoning of town centre T-01 is considered appropriate but the development of that area must be subject to the improvement in the road infrastructure and, in particular, the junction of Main Street and Church Road, before development is permitted and certainly before construction is commenced.

The retention of the school site at C-01 is welcome.

The requirement for open space at O-04 is unrealistic. The lands have already been acquired at a time when they were zoned for town centre development or in some cases they are still occupied as housing. There is no possibility that they will be acquired by any party to likely to develop them as open space and this area should be discounted in calculating the available open space in view of the fact that there is no reality to the delivery of it.

While the linkage between area T01 and T03 is welcome, there needs to be greater linkage between area T01 and T02.

Clause 1.2.38 – We would suggest that the Carhoo road be protected by increasing the 20 metre plant into 30 metres.

Clause 1.2.40 – The caves in Carrigtwohill have never been properly mapped and therefore their preservation has not been given adequate attention. Recent photographs of the stalagmites and stalactites show a very impressive cave system with considerable beauty. A proper assessment of the caves and the impact of the development upon them needs to be undertaken.

Dated the 12th of January 2011

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**Carrigtwohill Community Council**