Volume 1 - Part B

Main Report

Main Issues Raised on the
Proposed Amendments to the
Draft County Development Plan
in relation to Annaghmore

# Document Verification Page 1 of 1

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#### 1.0 Introduction

This report reviews the main planning issues contained in the submissions, both for and against the inclusion of a new settlement at Annaghmore as outlined in the Proposed Amendment to the County Development Plan. The report sets out a summary of conclusions/overview of recommendations, observations from the statutory bodies together with a summary of issues arising from the Strategic Environmental Assessment of the Proposed Amendments. The County Manager's recommendation to the Members and the proposed changes are set out at the end of the report. The Amendments to the Draft County Development Plan relating to Annaghmore are: 2.4, 2.5, 2.6, 2.9, 2.10, 3.40, 3.41, 3.42, 6.28, 9.1, 9.2 and due to the nature of the proposal, the amendments can only are dealt with collectively.

The Supplementary County Manager's Report to Members (Proposals for a new settlement at Annaghmore 5<sup>th</sup> of August 2008) is reproduced in Volume 2 Appendix C of this Manager's Report.

In summary the Annaghmore proposal is:

- A 200 ha green field site located on the N71 National Secondary Route from Cork City to Bandon, Clonakilty and West Cork. The land is approximately 17 kilometres south west of Cork City and 12 kilometres north east of Bandon.
- o The proposal would include 1500 housing units which equates to a community of approximately 3,000 people and employment opportunities for in the order of 460 people
- The developer states that the settlement will include sport, leisure and recreational facilities and provision will be made for schools, church and other community services.

#### 2.0 Summary of conclusions and overview of recommendations

The Planning and Development Acts and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 restrict the elected Members of the Council to considering only the following matters in the making of a Development Plan.

These matters are as follows:

- o The proper planning and sustainable development of the area;
- o The statutory obligations of any Local Authority in the area to which the development plan relates;
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government;
- The Environmental Report (SEA);
- The Appropriate Assessment of the Plan in relation to the Habitats Directive (92/43/EEC) and the Birds Directive (79/409/EEC)
- Submissions or observations made to the Local Authority under Section 12(1) and 12(7) of the Planning and Development Acts (Submissions by the public, the Minister and the statutory bodies);
- o Any trans-boundary environmental effects.

#### 2.1 The Proper Planning and Sustainable Development of the Area

The Supplementary Manager's Report addressing the Annaghmore proposal issued on 5<sup>th</sup> August 2008 (Volume 2 - Appendix C) sets out, in detail, the basis for the Manager's view that the proposal is generally inconsistent with the proper planning and sustainable development of the area.

In summary the County Manager's view is that:

- The new settlement proposed at Annaghmore is contrary to both the CASP plan adopted in 2001 and its Update prepared in 2008.
- The new settlement proposed at Annaghmore is contrary to the Southwest Regional Planning Guidelines.

The strategy to guide the future development of the County put forward in the Draft County Development Plan and the Manager's recommended amendments (i.e. excluding Annaghmore) represents the most sustainable option for the future of the County as whole

Notwithstanding the fact that the promoter of the project and a body of public opinion are in favour of the Annaghmore proposal, no new issues have been identified in the submissions that are sufficient to change the opinion of the Manager.

### 2.2 The Obligations of other Local Authorities in the Area

Cork City Council, Bandon, Midleton and Youghal Town Councils have strongly objected to the proposal because of the conflict with the CASP strategy for the Cork area, the effect of the proposal on planned population growth in the other Ring Towns and because they consider the proposal inconsistent with the proper planning and sustainable development of the County generally.

#### 2.3 The Policies or Objectives of the Government and Ministers

**2.3.1 The Department of the Environment Heritage and Local Government -** clearly indicated, in their submission that, the proposal conflicts with the policy objectives of the National Spatial Strategy in that Annaghmore is not served by public transport or close to community facilities. Annaghmore materially conflicts with the urban settlement strategy set out in the Cork Area Strategic Plan and will have significant adverse effects on the environment by virtue of the limited capacity of the Owenabue River to receive additional wastewater effluent (as highlighted in the SEA).

The Department state that the inclusion of Annaghmore would result in the plan failing to meet its statutory requirements, as required by section 10(1) of the Planning and Development Act 2000, to set out an overall strategy for the proper planning and sustainable development of the area.

- **2.3.2 The Department of Transport -** oppose the creation of a new settlement at Annaghmore because it is completely out of line with the settlement strategy that underpins the transportation strategy in the CASP, which the Department has funded and the proposal will encourage car based commuting.
- **2.3.3 The Department of Education and Science** identify the need for a primary school as part of the development but also point out that there will be a deficit of 365 pupil places at post primary level in the Annaghmore development.

This raises the issue that a settlement with a population at the scale of Annaghmore will be difficult to sustain on education grounds because it cannot support the development of new stand alone post primary school because the size of such a school would not be capable of delivering a broad and balanced curriculum. Children of post primary school going age will be reliant on long distance commuting in order to gain access to post primary education.

**2.3.4 The National Roads Authority** - identify that the development of this proposed new town adjacent to the N71, where a speed limit greater than 50kph applies and requiring access to the national route, would have an adverse significant effect on the national roads network, is contrary to official policy and inconsistent with the measures to protect the carrying capacity, safety and operational efficiency of the national road network.

The NRA recommend that Cork County Council reject the proposal for a new settlement at Annaghmore in order to protect the investment in the improvement of national road infrastructure and to maintain the safety, capacity and efficiency of national roads.

### 2.4 The Environmental Report (SEA)

The Strategic Environmental Assessment of the Proposed Amendment highlights the key issues of concern which could be avoided if the alternative strategy to distribute future population growth amongst the ring towns were adopted.

The body of public opinion that has set out its views against the proposal has drawn attention to the greater weight that it believes should be given to the environmental consequences of this proposal.

#### 2.5 Appropriate Assessment

There are no issues arising in relation to Appropriate Assessment

#### 2.6 Submissions/observations received

A total of 549 submissions (including those made by statutory or public bodies such as other Local Authorities) were received in relation to the proposal for a new settlement at Annaghmore. 390 submissions were opposed to Annaghmore and 159 were in favour of Annaghmore.

One submission (reference number 2541 is opposed to the proposed development at Annaghmore and is signed by 420 people.

The publication of the proposed amendments in relation to Annaghmore has generated significant public interest both for and against the proposal. There has also been a response to the publication of the Amendments to the County Development Plan from the statutory bodies who have all indicated that the Annaghmore proposal would amount to a major departure from established public policy and in particular the conflict with the Cork Area Strategic Plan is cited as damming to the proposal. In addition, the SEA of the proposal has indicated several areas where there is the potential for conflict with the clearly stated environmental objectives and the public have indicated in their responses that greater weight should be given to these issues in the Council's decision.

### 2.7 Trans-boundary Effects

There are no trans-boundary effects in relation to this proposal

#### 2.8 Conclusions

It is the County Manager's opinion that the proposal to make provision in the County Development Plan for a new settlement at Annaghmore is:

- Inconsistent with proper planning and sustainable development of the area;
- Contrary to the statutory obligations of other Local Authorities in the area to which the development plan relates;
- Contrary to the policies and objectives of the Government and its Ministers;
- o In conflict with the conclusions of the Environmental Report; and
- o Generally, in conflict with the submissions and observations made to the Council under section 12(1) and 12 (7) of the Planning and Development Acts

It is recommended to make modifications to the proposed changes removing references to Annaghmore and making other consequential changes.

Details of the Manager's recommendations and modifications to the plan are set out at the end of this report in Section 10.

#### 3.0 Submission on behalf of the promoter of the development

A comprehensive submission was received from the promoter of the development challenging the assumptions contained in the SEA of the proposal. A detailed response is set out in Section 8.3.

The submitter highlights that the development of a new town will ensure alternative travel modes will be catered for. The submitter claims that the provision of well designed alternative travel modes (pedestrian, cycle and parking) will improve quality of life in the town but concedes that there will be additional traffic in the surrounding area. The submitter states that the N71 will be re-aligned adjacent to Annaghmore and claims that the additional traffic can be alleviated by a diversion of the West Cork bus services via Annaghmore.

The submitter claims that the Annaghmore site selection process involved a review of planning policy, land suitability, accessibility and transport, market demand, infrastructure provision and socio-economic issues. The submitter further notes that a full assessment of the capacity of the site to absorb the new settlement has been completed and submitted to the CASP update process. It is claimed by the submitter that population growth targets for the main settlement have been allocated without the assessment of the existing settlement's capacity to absorb growth.

## 4.0 Main issues raised in the submissions in favour of the inclusion of Annaghmore in the County Development Plan

#### 4.1 Employment

The submitters claim that Annaghmore would create approximately 460 jobs and states that this is a reason for the proposal to be permitted.

#### **4.2 Economic Development**

The submitters maintain that Annaghmore would foster economic development and therefore should be included in the County Development Plan.

### 4.3 Overcrowding

The submitters highlight that Annaghmore would provide an alternative to the existing "overcrowded" settlements in the County.

#### 4.4 Planned Town

The submitters state that Annaghmore should be permitted as the proposed new settlement would incorporate a mix of uses and facilities which are lacking in other settlements in the County.

## 5.0 Main issues raised in the submissions against the inclusion of Annaghmore in the County Development Plan

#### 5.1 Non compliance with CASP

It is noted in the submissions that Annaghmore is not included in the Cork Area Strategic Plan (CASP) 2001 or the current updated version of CASP (2008 - 2020), therefore no provision or recommendation has been made for this new settlement in the strategic planning of integrated transport infrastructure, water supply, waste management/disposal, sewage treatment/disposal, social/community development, housing allocation, retail allocation, economic development or environmental impact management.

The submissions note that the 2008 CASP report does not include Annaghmore as a Ring Town or Rural Area in the proposed overall strategic plan and does not envisage a significant increase in future population for Bandon and the Bandon Hinterland in 2020 therefore the submissions claim that the proposed new settlement at Annaghmore is contrary to CASP.

The submissions maintain that Annaghmore is not included in the scope of the CASP overall strategic plan for housing location. The submissions note that the 2006 Housing land availability study and the Amendment to the Bandon Local Area Plan identified sufficient development land in Bandon to

support the predicted target population as outlined in CASP and therefore the point is made that no additional lands are required. The submissions also claim that Annaghmore will have a negative impact on the surrounding towns of Bandon, Macroom and Kinsale in terms of reaching their target population and potential employment levels.

#### 5.2 Flooding

It is claimed in the submissions that the proposed development at Annaghmore will affect the Owenabue River and consequently impact on flooding in Carrigaline. The submissions note that the inclusion of Annaghmore in the Draft County Development Plan is contrary to the draft Flood Risk Management Guidelines issued by the Department of Environment. The draft guidelines specify that only "essential" developments should be considered for sensitive areas and the submissions assert that the development at Annaghmore is not "essential" within the meaning of the guidelines. The submissions further note that there is a history of flooding in this region, from Annaghmore down the Owenabue River to the estuary at Carrigaline.

#### **5.3 Transport**

The point is made by the submitters that the inclusion of Annaghmore in the County Development Plan will not tie into the integrated transport system planned for the County and will have serious negative implications for the future management of the transport planning process for Cork (City and County). The submitters have concerns that the proposed development at Annaghmore would add significantly to the existing traffic problems on the approach roads to Cork City particularly the N71. The submitters question if the capacity of the N71 has been considered in relation to the proposal. The submitters maintain that it is illogical to promote a development of the scale of Annaghmore in a location not served by a rail network.

#### **5.4 Environmental Impact**

The submissions highlight the potential environmental impact of the proposed development at Annaghmore on a) Habitats, b) "Brown Field Sites", c) Water, d) Landscape and e) Quality of life issues. The submissions claim that the Strategic Environmental Assessment does not fully establish the potential impact of the development at Annaghmore on the issues listed above. The submissions maintain that the proposed development at Annaghmore will have permanent devastating consequences for the environment and further assert that it is inappropriate to include the development at Annaghmore in the County Development Plan.

#### 5.5 Deficiencies in water supply and sewage treatment

The submitters claim that the Owenabue River would not be able to sustain the outflow of a wastewater treatment plant serving a settlement of the size proposed at Annaghmore and the submitters question where the wastewater treatment plant would be located for the proposed development. The submitters highlight that the Ballea water works use the Owenabue River as its water source and maintain that it is poor planning to lower the quality of the input water due to the new settlement upstream. The submitters are concerned about storm water and wash off from a town the size of Annaghmore, which in their view would cause an unacceptable concentration of contaminants.

#### 5.6 Change in Policy

The submitters note that the area where Annaghmore is proposed has been designated "A2" for many years resulting in the refusal of planning permission in order that the lands be preserved as agricultural in nature. It is claimed that it is unacceptable for this policy to be replaced with a policy supporting "intense development". The submitters make the point that the corridors to west Cork and Kerry must be preserved in a manner which is as aesthetically pleasing as possible to maximise tourism potential.

#### 5.7 Post Primary School

The submitters claim that if the proposed new settlement at Annaghmore were permitted, children of secondary school age would be required to travel to Bandon, Carrigaline, Kinsale or Cork City for secondary education due to the fact that guidance from the Department of Education suggests that settlements with a population at the scale of Annaghmore will not be able to support the development of new secondary schools

## 6.0 The following submissions were received from relevant statutory bodies in relation to Annaghmore

#### 6.1 Department of the Environment, Heritage and Local Government

The Department object to the inclusion of Annaghmore as a new settlement in the County Development Plan for the following reasons:

- a) It is pointed out that Annaghmore conflicts with the policy objectives of the National Spatial Strategy in that Annaghmore is not served by public transport or close to community facilities,
- b) The point is made that Annaghmore materially conflicts with the urban settlement strategy set out in the Cork Area Strategic Plan,
- c) The Department are of the view that Annaghmore will have significant adverse effects on the environment by virtue of the limited capacity of the Owenabue River to receive additional wastewater effluent (as highlighted in the SEA) and
- d) The Department highlight that the inclusion of Annaghmore would result in the plan failing to meet its statutory requirement, as required by section 10(1) of the Planning and Development Act 2000, to set out an overall strategy for the proper planning and sustainable development of County Cork.

#### 6.2 Department of Transport

The Department of Transport oppose the creation of a new settlement at Annaghmore for the following reasons;

- a) It is claimed that the proposal is completely out of line with the settlement strategy underpinning the transportation strategy in the CASP, which the Department has funded;
- b) The Department maintain that the proposed development will encourage car based commuting;
- c) The Department note that the proposal is contrary to the CASP update (2008) which has stressed the need to address population decline in Cork City and to focus future population growth in the Metropolitan area along the rail corridor;
- d) The Department maintain that the Annaghmore proposal undermines the basis of, and the rationale for, the significant investment which it is making in the CASP area and state that the proposal would threaten future investment in public transport in the CASP area.

#### 6.3 Cork City Council

Cork City Council have expressed concern that there is a significant departure from the CASP strategy with the introduction of a new settlement at Annaghmore. They note that CASP envisaged a concentration of population and employment growth in sustainable locations in the city and Metropolitan Cork, where high quality public transport could be provided as an alternative to the private car and moderate increases in population and employment in the Ring Towns.

The City Council state that the development of a new town at Annaghmore is not consistent with the central concepts of CASP as the town is not located within the Cork Suburban Rail corridor or either of the planned Rapid Transit corridors identified in the CASP update. The city Council state that the community living in Annaghmore would be likely to be almost totally dependent on the private car, with resultant congestion on the N71, impacting on other towns further west. The submission also notes that the population allocated to Annaghmore results in a reduction of the population allocated to the other ring towns contrary to the CASP strategy and the South West Regional Planning Guidelines.

Cork City Council note that the development at Annaghmore will result in a consequential reallocation of resources for infrastructure away from the existing growth areas with a consequential divergence of economies of scale in terms of investment in infrastructure.

### 6.4 Bandon Town Council

The submission objects to the inclusion of the proposed new settlement of Annaghmore in the County Development Plan. The submission highlights the following concerns;

- **6.4.1** The Members of Cork County Council have not discussed the proposal with the elected members of Bandon and other Town Councils in the catchment area.
- **6.4.2** Inadequate public transport and inadequate road networks in the area.
- **6.4.3** The significant population increase in Bandon, Inishannon and the South City Environs has resulted in a significant increase of traffic along the N71. It is therefore of serious concern to Bandon Town Council that the development of Annaghmore is at variance with both the Cork County Development Plan and the Cork Area Strategic Plan.
- **6.4.4** The development of Annaghmore would greatly interfere with the potential development of its surrounding areas including Crossbarry, Ballinhassig, Ballygarvan, Halfway and other nearby villages.
- **6.4.5** The proposal will also draw from the development and population growth of Bandon, Kinsale, Macroom and the proposed strategic employment centre for West Cork in Clonakilty.
- **6.4.6** Annaghmore would impact on the Innishannon Water Supply Scheme. Additionally the Owenabue does not have the capacity to absorb the wastewater discharge from the proposed "new town" and this would result in the necessity to pump wastewater into the Bandon catchment downstream of Innishannon. It would be necessary to pump water from the Innishannon Water Scheme to meet the demand at a potentially huge cost in developing new infrastructure to meet future demands. The proposal would not seem to be in accordance with the Water Framework Directive and the South West River Basin Management Plan.
- **6.4.7** The proposed development would be built on a flood plain that could have serious implications for other areas downstream. Recent heavy rains resulting in flooding and major traffic disruption should also be considered when taking into account the increase in the number of vehicles which this town would bring.

#### 6.5 Midleton Town Council

This submission objects to the proposed variation to include proposals for the development of a new town at Annaghmore for the reasons outlined in the Supplementary County Manager's Report to Members of Cork County Council (5th of August 2008) and in the letter dated 4th September 2008, addressed to each Member of Midleton Town Council from the Town Clerk. Midleton Town Council requests that the new County Development Plan not make provision for such a development.

#### 6.6 Youghal Town Council

This submission states that the proposal for Annaghmore is contrary to the Cork Area Strategic Plan and takes from the development potential of the Ring Towns of Fermoy, Mallow, Macroom, Bandon, Kinsale and Youghal. The members of Youghal Town Council contest that the Annaghmore proposal is contrary to 1) The National Spatial Strategy, 2) the proper planning and sustainable development of existing ring towns and 3) the current transport policy, infrastructural services policies. Youghal Town Council formally requests that the New County Development Plan does not make provision for this developer driven development and to develop long tern proven Development Strategies such as CASP.

#### 6.7 National Roads Authority

The National Roads Authority claim that Annaghmore appears to contravene materially the newly updated CASP. The NRA advises that the development of this proposed new town adjacent to the N71, where a speed limit greater than 50kph applies and requiring access to the national route would have an adverse significant effect on the national roads network, is contrary to official policy and inconsistent with the measures to protect the carrying capacity, safety and operational efficiency of the national road network.

The NRA recommend that Cork County Council reject the proposal for a new settlement at Annaghmore in order to protect the investment in the improvement of national road infrastructure and to maintain the safety, capacity and efficiency of national roads.

#### 6.8 The Environmental Protection Agency

The EPA highlight that the proposed new settlement at Annaghmore would be located in a vulnerable area (as described in Section 5 of the Environmental Report) and in an area At Risk as defined by the Water Framework Directive.

The EPA note that the proposed development should be subject to a Local Area Plan with full Strategic Environmental Assessment and, possibly, Appropriate Assessment. The EPA also note that the SEA process may guide the development to a more suitable location, if necessary.

The EPA claim that adequate and appropriate infrastructure must be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the County Plan.

The EPA note that strong consideration must be given to protecting environmental resources in the areas affected by the proposed development.

#### 6.9 Department of Education and Science

The submission highlights the criteria that the Department use to calculate the requirements for new schools. The submission calculates that a total of 15 no. classrooms will be required for a primary school site in Annaghmore on a site of 2.8 acres. The submission also notes that there will be a deficit of 365 pupil places at post primary level in the Annaghmore development.

#### 7.0 Point of Note

It should be noted that two of the submissions received (ref. no. 2399 & 2400) propose areas for zoning in the South Environs as alternatives to the development of the new town at Annaghmore. It is the County Manager's opinion that in the absence of the new settlement at Annaghmore, the preferred settlement strategy is the distribution of that population between the Ring Towns, in line with the spatial distribution of population recommended by CASP and CASP Update. Furthermore, it is considered that the issue of the zoning of land is a matter for the review of the Carrigaline Electoral Area Local Area Plan.

## 8.0 Issues arising from the Strategic Environmental Assessment of the Proposed Amendments in relation to Annaghmore

In excess of 300 submissions received in relation to Annaghmore made reference to the Strategic Environmental Assessment of the Proposed Amendments. This section summarises the issues raised in the Annaghmore submissions relating to the SEA and the response of Cork County Council.

#### 8.1 EPA Submission - Annaghmore

The EPA submission notes that specific and adequate mitigation measures should be identified and highlights that it may be appropriate for Annaghmore to be subject to its own Local Area Plan with comprehensive SEA.

#### 8.1.1 Response

The SEA guidelines require that the SEA must consider if there are any significant environmental effects which have not previously been identified or addressed in the Environmental Report. The SEA screening attempts to highlight those issues where potential conflicts may arise and these issues may need to be considered as any proposal is developed.

As the County Development Plan is a strategic document it is not considered appropriate to look comprehensively at site-specific issues but rather highlight areas of concern so that a more informed decision may be made.

#### 8.2 General Submissions in relation to the SEA of Annaghmore

There were over 300 submissions received in relation to SEA of Annaghmore which were similar in nature. The issues raised in the submissions are highlighted below. Issues:

- SEA of the proposed amendment does not fully establish the potential impact of the proposed development.
- o The proposed settlement will have permanent devastating consequences on the environment and would be contrary to the Draft Flood Risk Management Guidelines.
- Amendment will have a negative impact on existing communities, economic development, population targets and the development of integrated transport infrastructure in the county.

#### 8.2.1 Response

The SEA of the County Development Plan has followed the process throughout as recommended in the SEA legislation and SEA guidelines. Annaghmore, as a Ring Town, was proposed as a significant amendment at an advanced stage in the plan.

The principle of directing development towards identified existing settlements has been established through: National and Regional guidelines, CASP, the previous County Development Plan, Local Area Plans and Special Local Area Plans. The CASP update, which allocated the projected population target figures between the existing settlements in County Cork, has been subject to a separate Strategic Environmental Assessment process. Annaghmore is being proposed as a new settlement in a Proposed Amendment to the Draft County Development Plan and as such the principle of development at this location has not been established. Hence it was necessary to consider the proposed amendment as part of the SEA process.

Having regard to the fact that the Development Plan is required to set out a strategic spatial framework at a high level, the SEA of the proposed amendment in relation to Annaghmore, of necessity, concentrates on the issues at a strategic level rather than on a site specific basis and as a consequence, proposed mitigation measures cannot be developed to a significant extent.

In line with the comments made by the EPA in their submission, a development of this size and scale, might be more appropriately subjected to a SLAP with full Strategic Environmental Assessment, including possible Appropriate Assessment, which would afford an opportunity to identify and closely examine alternatives to the proposed development.

#### 8.3 Submission on behalf of the promoter of the development

A comprehensive submission was received from the promoter of the development challenging the assumptions contained in the SEA of the proposal. The submission notes that the designation of Annaghmore is no more, or less in conflict with the SEA process than attributing enhanced growth targets to existing settlements. The submission notes that a detailed assessment of the issues can be mitigated and can be carried out during the detailed design and planning stage. The submission also notes that a full assessment of the sites capacity to absorb the new settlement has been completed and submitted to the CASP update process.

The main points in the submission are as follows:

**8.3.1** Habitats – A detailed environmental assessment of receiving waters and mitigation measures will be carried out during the detailed design and planning stage.

**8.3.2** Prioritising Brownfield Sites/Conserving Soil – The submitter contends that development of Annaghmore will have a neutral impact on Environmental Protection Objective (EPO) - S1 "Prioritising Brownfield sites" because other towns will also require greenfield development.

- **8.3.3** Water Supply The submitter claims that an existing 300mm water line passing near Annaghmore will become available for use (when Carrigaline gets its own water from Inniscarra) and therefore there will be no need for additional public infrastructure.
- **8.3.4** Flood Risk A preliminary hydrological assessment of the lands at Annaghmore has been prepared and an environmental assessment and master plan will ensure that the development of the site will follow best practice in minimising flood risk and avoiding exacerbation of any downstream flooding.
- **8.3.5** Wastewater The submitter claims that the wastewater from the development will be treated on site and discharged into the tidal Bandon River downstream from Innishannon. The submitter also maintains that there will be no public funding required and no negative environmental effects on either the Owenabue or Bandon Rivers.
- **8.3.6** Stormwater –It is claims that only 50% of the site will be developed with the remainder being used for amenity with sustainable drainage systems (SuDS) thereby limiting runoff into the Owenabue River catchments.
- **8.3.7** Landscape The submitter notes that a strategic landscape development framework will identify a hierarchy of open space, vistas and structural screen planting to be carried out through a phased implementation programme of development.

#### 8.3.8 Response:

The SEA of the County Development Plan has followed the process throughout as recommended in the SEA legislation and SEA guidelines. Annaghmore, as a Ring Town, was proposed as a significant amendment at an advanced stage in the plan.

The principle of directing development towards identified existing settlements has been established through: National and Regional guidelines, CASP, the previous County Development Plan, Local Area Plans and Special Local Area Plans. The CASP update, which allocated the projected population target figures between the existing settlements in County Cork, has been subject to a separate Strategic Environmental Assessment process. Annaghmore is being proposed as a new settlement in a Proposed Amendment to the Draft County Development Plan and as such the principle of development at this location has not been established. Hence it was necessary to consider the proposed amendment as part of the SEA process.

The SEA of the proposed amendment attempted to highlight the key issues of concern. As the County Development Plan is a strategic document it is not considered appropriate to look comprehensively at site-specific issues but rather highlight areas of concern so that a more informed decision may be made. Five areas of concern are identified are identified in the Environmental Report.

It is recognised that detailed mitigation proposals have been suggested by the developer. However, the principles of Strategic Environmental Assessment are based on the fair consideration of alternatives so that of those alternatives with the lowest cumulative level of impact on the environment can be chosen.

The SEA Guidelines require that reasonable alternatives taking into account the objectives and geographical scope of the plan or programme should be considered and that rational choices need to be made and demonstrated at the level of each particular plan.

The CASP Update Strategy for the Cork area gave consideration to the Annaghmore proposal and its conclusions were subjected to SEA. Adopting the CASP strategy to distribute population amongst the

ring towns without provision for the new town at Annaghmore is considered to be the strategy that minimises the environmental impact of that population growth. By adopting that strategy in the County Development plan the areas of environmental concern identified in the SEA in relation to Annaghmore can be avoided.

#### 9.0 Appropriate Assessment

The 'Appropriate Assessment' carried out by Cork County Council found that the proposed development at Annaghmore was unlikely to have a significant impact on any European site. The proposed settlement is approximately 18km upstream of the Owenboy (Abhainn Bui) River part of Cork Harbour proposed Special Protection Area (4030). The proposed settlement is not considered likely to have significant adverse effects on the proposed Special Protection Area, due to its distance upstream.

#### 10.0 Managers Recommendation

The Amendments to the Draft County Development Plan relating to Annaghmore are: 2.4, 2.5, 2.6, 2.9, 2.10, 3.40, 3.41, 3.42, 6.28, 9.1 and 9.2. A list of all submissions relating to Annaghmore can be seen in Table 1 at the end of this document.

The Manager recommends the following changes to the Draft County Development Plan.

#### **PROPOSED CHANGE NO. 2.4**

## <u>INSERT A REVISED TABLE 2.5 CASP RING STRATEGIC PLANNING AREA POPULATION 2006-2020</u>

## PROPOSED CHANGE

The Manager recommends that the table below is inserted to replace Table 2.5. The figures in the revised table reflect the omissions of Annaghmore and the reorganisation of the population distribution to those figures detailed in the Supplementary County Manager's Report to Members (Draft Changes Document Part A – Written Material 11<sup>th</sup> July 2008 as outlined below)

			Target 2020
	2002	2006	2020
Main Towns	-	-	-
Mallow	8,937	10,241	20,000
Bandon	5,161	5,822	7,379
Fermoy	4,804	5,873	7,442
Kinsale	3,554	4,099	4,519
Macroom	2,985	3,553	4,351
Youghal	6,597	6,785	8,309
Total Main Towns	32,038	36,373	52,000
Villages and Rural	59,995	68,682	69,760
Total CASP Ring	92,033	105,055	121,760

#### **PROPOSED CHANGE NO. 2.5**

### **REMOVE PARAGRAPH AFTER PARAGRAPH 2.3.20**

The designation of a new settlement on the N71 at Annaghmore will bring additional growth to the west of the city with a proposed residential component which would serve a population of approximately 3,000 persons, in addition to a mix of uses, including employment and local services. The Bandon Electoral Area Local Area Plan will identify the site for this proposed new settlement and set out a framework for its development.

#### **PROPOSED CHANGE 2.6**

#### **REMOVE ADDITIONAL TEXT IN PARAGRAPH 2.3.21**

#### The CASP Ring Strategic Planning Area

The policy and objectives of this plan for the CASP Ring Strategic Planning Area are based on the following planning and sustainable goals:

- a) To recognise the importance of the role to be played by Mallow as a 'Hub' town in the implementation of the National Spatial Strategy and the Atlantic Gateways Initiative; to promote its development as a major centre of employment and population where there is a high standard access to educational and cultural facilities;
- b) To establish an appropriate balance in the spatial distribution of future population growth, broadly in line with the Cork Area Strategic Plan, so that Bandon, Fermoy, Macroom and Youghal can accelerate their rate of growth and achieve a critical mass of population to enable them to maximise their potential to attract new investment in employment, services and public transport.
- c) To protect and enhance the natural and built heritage assets of Kinsale to facilitate the development of the town as a Principal Tourist Attraction.
- d) To facilitate the development of the villages and rural areas so that the rate of future population growth compliments the strategy to achieve a critical mass of population in the towns and provide protection for those areas recognised as under pressure from urban development.
- e) To strengthen and protect the rural communities of the area by encouraging sustainable growth in population, protecting agricultural infrastructure and productivity so that agriculture remains the principal rural land use and focussing other employment development in the main towns and key villages.
- f) To secure the reopening of the rail route linking Cork and Midleton to Youghal
- g) To recognise the importance of the Strategic Transport Improvement Corridor to the overall economic potential of the south-western part of the area and to the facilitation of a balanced economic strategy for the County as a whole.
- h) To designate a new settlement on the N71at Annaghmore to support the Strategic Transport Improvement Corridor.

## **Proposed Change 2.9**

## FIGURE 2.2: STRATEGIC PLANNING AREAS

## **Proposed Change**

It is proposed that Figure 2.2 be amended to **REMOVE** Annaghmore in the CASP Ring Strategic Planning Area.

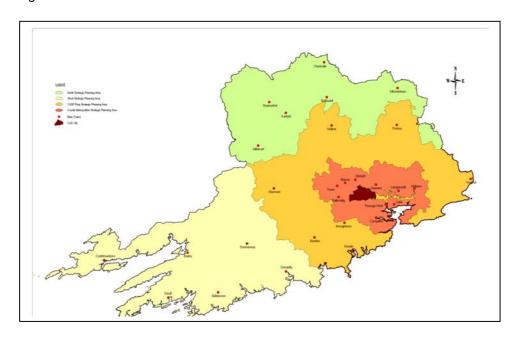


Figure 2.2: Strategic Planning Areas

## **PROPOSED CHANGE 2.10**

## FIGURE 2.3: CORK COUNTY STRATEGIC DIAGRAM

## **Proposed Change**

It is proposed that Figure 2.3 be amended to **REMOVE** Annaghmore as a main town.

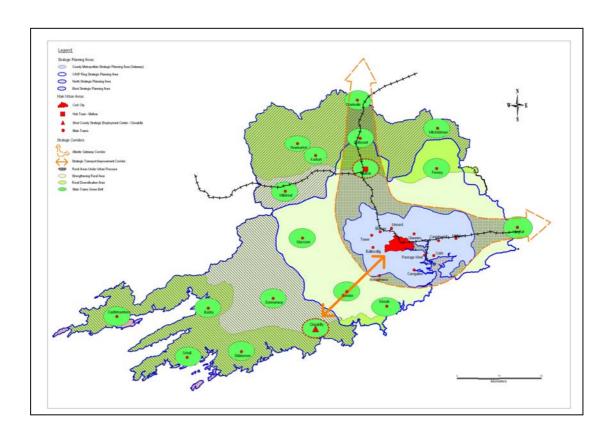


Figure 2.3: Cork County Strategic Diagram

## **PROPOSED CHANGE NO. 3.40**

## AMEND TABLE 3.1: 'STRATEGIC PLANNING AREAS IN COUNTYCORK' TO REMOVE ANNAGHMORE FROM THE LIST OF SETTLEMENTS

Strategic Planning Area	Settlements
County Metropolitan Strategic Planning Area	City Environs (North and South) Ballincollig Blarney Carrigaline Carrigtwohill Cobh Glanmire Midleton Passage West Tower
CASP Ring Strategic Planning Area	Mallow Annaghmore Bandon Fermoy Kinsale Macroom Mallow Youghal
West Strategic Planning Area	Bantry Castletownbere Clonakilty Dunmanway Schull Skibbereen
North Strategic Planning Area	Buttevant Charleville Kanturk Millstreet Mitchelstown Newmarket

### **PROPOSED CHANGE NO. 3.41**

### AMEND PARAGRAPH 3.3.5 TO REMOVE ANNAGHMORE AS A RING TOWN

## **Proposed Change**

3.3.5. These towns, together with the Metropolitan Cork Towns and their hinterlands form the remainder of the area to which the Cork Area Strategic Plan (CASP) relates. The towns are Bandon, Fermoy, Kinsale, Macroom, Youghal. and the proposed new town of Annaghmore.

#### **PROPOSED CHANGE NO. 3.42**

#### AMEND SECTION 3.3 TO REMOVE ANNAGHMORE AS A RING TOWN

## **Proposed Change**

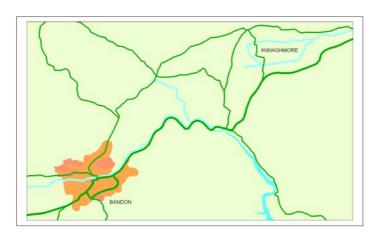
It is proposed to **REMOVE** a new paragraph, objective and population and household table relating to Annaghmore after paragraph 3.3.13.

### **Annaghmore**

SET 1-X	It is an objective of this plan to designate a new settlement at Annaghmore. The settlement will provide for a mix of uses, including residential, employment and local services and will form part of
	employment, and local services and will form part of the Bandon Electoral Area Local Area Plan.
	the Bandon Electoral Area Local Area Fiant.

The review of the Bandon Electoral Area Local Area Plan will set out detailed proposals for the new town of Annaghmore in the Annaghmore area close to the N71 National Secondary Route from Cork City to Bandon, Clonakilty and West Cork. The area is about 17 kilometres south west of Cork City and 12 kilometres north east of Bandon. The Bandon Electoral Area Local Area Plan will also make provision for a community of about 3,000 people at Annaghmore and supporting social and physical infrastructure.

Annaghmore	<del>2002</del>	<del>2006</del>	2020 Target	Growth 2006-2020
Population	0	0	3,000	3,000
Households*	0	0	1,245	1,245



NOTE: THIS CHANGE REFERS TO THE TEXT AND DIAGRAMS OF THE PLAN.

#### PROPOSED CHANGE NO. 6.28

## AMEND OBJECTIVE INF 5-2 AND 5-3 TO AMMEND THE POPULATION PROJECTIONS FOR CASP AREA AND TO REMOVE ANNAGHMORE IN INF 5-3

#### **PROPOSED CHANGE**

It is proposed to make a change to the draft plan to amend Objective INF 5-2 and INF 5-3.

Ballincollig	21,430
Blarney	7,533
Carrigaline	14,066
Carrigtwohill	12,012
Cobh	14,534
Glanmire	10,788
Midleton	23,735
Monard	7,788
Passage West	5,286
Tower	3,660

Water services Infrastructure Provision – CASP Ring Strategic Planning Area

It is an objective of this Plan to secure and prioritise the phased provision of water supply, wastewater disposal and drainage infrastructure for the main towns in this area so that they can achieve the following target populations by the year 2020:

	Mallow	20,000
	Bandon	7,335
INF 5-3	Fermoy	7,314
	Kinsale	4,036
	Macroom	3,954
	Youghal	7,499

N.B. Revised population targets for this area will be included in this Plan at the amendment stage (summer 2008) following the updating of CASP to take account of the most recent population targets for the South West Region issued in February 2007

\*Derived from Mallow Special Local Area Plan

#### PROPOSED CHANGE NO. 9.1

## AMEND TABLES 9.1-9.10 RELATING TO POPULATION, HOUSEHOLD AND NEW HOUSES

### **PROPOSED CHANGE**

It is proposed to delete tables 9.1-9.10 and replace with the following new tables. The figures in the revised table reflect the omissions of Annaghmore and the reorganisation of the population distribution to those figures detailed in the Supplementary County Manager's Report to Members (Draft Changes Document Part A – Written Material  $11^{th}$  July 2008 as outlined below)

Table 9.1 Bandon Ele 2006-2020	ectoral Area:	Population, I	Households & New	/ Houses Required
	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Population				
Bandon	5,161	5,822	1,557	7,379
Kinsale	3,554	4,099	420	4,519
Villages and Rural	17,171	19,505	301	19,806
Total Population	25,886	29,426	2,278	31,704
-				
Households				
Bandon	1,681	1,980	1,142	3,122
Kinsale	1,158	1,394	555	1,949
Villages and Rural	5,429	6,504	1,731	8,235
Total Households	8,268	9,878	3,428	13,306
New Dwellings Required			4,456	

	0000 0	0000 0	0	
	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Population				
Bantry	3,150	3,309	987	4,296
Castletownbere	875	868	259	1,127
Schull	693	576	172	748
Villages and Rural	14,122	14,719	785	15,504
Total Population	18,840	19,472	2,203	21,675
•			, ,	
Households				
Bantry	1,061	1,165	640	1,805
Castletownbere	295	306	167	473
Schull	233	203	111	314
Villages and Rural	5,023	5,492	959	6,451
Total Households	6,612	7,166	1,877	9,043
New Dwellings Required			2,440	

Table 9.3 Blarney Elec 2006-2020	toral Area	: Population,	Households &New	Houses Required
	2002	2006	Growth 2006 -2020	2020 Target
Population				
Cork North Environs	3,778	4,732	4,299	9,031
Blarney	2,146	2,400	5,133	7,533
Glanmire	6,853	8,385	2,403	10,788
Monard	0	0	7,788	7,788
Tower	3,032	3,102	558	3,660
Villages and Rural	22,260	23,704	3430	27,134
Total Population	38,069	42,323	23,611	65,934
Households				
Cork North Environs	1,184	1,572	2,217	3,789
Blarney	673	797	2,377	3,174
Glanmire	2,148	2,786	1,724	4,510
Monard	0	0	3,279	3,279
Tower	950	1,030	555	1,585
Villages and Rural	6,464	7,140	4,136	11,276
Total Households	11,420	13,325	14,288	27,613
New Dwellings Required			18,575	

Table 9.4 Carrigaline	Electoral Area	a: Population,	Households & Ne	w Houses Requir
2006-2020	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Population				
Cork South Environs	26,381	30,002	100	30,102
Ballincollig	14,591	15,760	5,670	21,430
Carrigaline	11,191	12,835	1,231	14,066
Passage West	4,595	5,203	83	5,286
Villages and Rural	11,933	13,398	3243	16,641
Total Population	68,691	77,198	10,327	87,525
Households				
Cork South Environs	8,270	9,967	2,467	12,434
Ballincollig	4,574	5,236	3,640	8,876
Carrigaline	3,508	4,264	1,591	5,855
Passage West	1,440	1,729	523	2,252
Villages and Rural	3,872	4,537	2,385	6,922
Total Households	21,664	25,733	10,606	36,339
New Dwellings Required	s		13,789	

	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Population				
Fermoy	4,804	5,873	1,569	7,442
Mitchelstown	3,300	3,365	1,981	5,346
Villages and Rural	15,887	18,254	522	18,776
Total Population	23,991	27,492	4,072	31,564
•			, ,	
Households				
Fermoy	1,565	1,998	1,150	3,148
Mitchelstown	1,107	1,189	760	1,949
Villages and Rural	5,293	6,436	1,372	7,809
Total Households	7,965	9,623	3,283	12,906
New Dwellings				
Required			4,268	

Table 9.6 Kanturk Ele	ectoral Area:	Population,	Households & Nev	v Houses Requir
2006-2020	1		Growth 2006 -2020	
Population	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Charleville	2,685	2,984	1,941	4,925
Kanturk	1,651	1,915	485	2,400
Millstreet	1,289	1,401	355	1,756
Newmarket	· ·	949	240	1,189
Villages and Rural	19,369	19,921	1034	20,955
Total Population	26,049	27,170	4,055	31,225
•				
Households				
Charleville	901	1,054	1,024	2,078
Kanturk	554	677	336	1,013
Millstreet	433	495	246	741
Newmarket	354	335	167	502
Villages and Rural	6,498	7,007	1,707	8,713
Total Households	8,740	9,568	3,479	13,047
New Dwellings Required			4,523	

	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET	
Population					
Macroom	2985	3553	798	4351	
Villages and Rural	18,500	21,024	408	21432	
Total Population	21,485	24,577	1,206	25,783	
-	<u>.</u>				
Households					
Macroom	972	1,209	671	1,880	
Villages and Rural	5,808	6,933	1,977	8,911	
Total Households	6,780	8,142	2,649	10,791	
New Dwellin	gs				
Required	-		3.443		

Table 9.8 Mallow Electron 2006-2020	ctoral Area:	Population, I	Households & New	/ Houses Required
	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET
Population				
Mallow	8,937	10,241	9,759	20,000
Buttevant	987	914	587	1,501
Villages and Rural	13,547	14,952	576	15,528
Total Population	23,471	26,107	10,922	37,029
Households				
Mallow	2,911	3,483	4,817	8,300
Buttevant	331	323	310	633
Villages and Rural	4,717	5,462	998	6,460
Total Households	7,959	9,268	6,125	15,393
New Dwellings Required			7,962	

Table 9.9 Midleton El 2006-2020	ectoral Area:	Population,	Households &New	Houses Required
	2002	2006	Growth 2006 -2020	2020 Target
Population				
Carrigtwohill	1,411	2,782	9,230	12,012
Cobh	9,811	11,303	3,240	14,543
Midleton	7,957	10,048	13,687	23,735
Youghal	6,597	6,785	1,524	8,309
Villages and Rural	20,546	23,101	3287	26,388
Total Population	46,322	54,019	30,968	84,987
Households				
Carrigtwohill	442	924	4,088	5,012
Cobh	3076	3,755	2,296	6,051
Midleton	2,494	3,338	6,484	9,822
Youghal	2,149	2,308	1,196	3,504
Villages and Rural	7,147	8,515	2,452	10,967
Total Households	15,308	18,840	16,516	35,356
New Dwellings Required			21,471	

Table 9.10 Skibberee Required 2006-2020	en Electoral	Area: Popu	lation, Household	s & New Houses	
	2002 Census	2006 Census	Growth 2006 -2020	2020 TARGET	
Population					
Clonakilty	3,698	4,154	4,564	8,718	
Dunmanway	1,532	1,522	454	1,976	
Skibbereen	2,000	2,338	697	3,035	
Villages and Rural	24,733	26,079	1,120	27,199	
Total Population	31,963	34,093	6,835	40,928	
Households					
Clonakilty	1,245	1,463	2,200	3,663	
Dunmanway	516	536	294	830	
Skibbereen	673	823	452	1,275	
Villages and Rural	8,098	8,930	2,374	11,304	
Total Households	10,532	11,752	5,320	17,072	
New Dwellings Required			6,916		

#### **PROPOSED CHANGE NO. 9.2**

## AMEND PARAGRAPH 9.5.5 TO REMOVE ADDITIONAL ISSUE RELATING TO ANNAGHMORE

#### **PROPOSED CHANGE**

It is proposed to **REMOVE** an additional bullet point (highlighted in bold) in paragraph 9.5.5 as follows;

#### Planning and Sustainable Development Issues for the Local Area Plan

The main issues to be addressed in the Local Area Plan for this electoral area include:

- Encouraging balanced population growth so that the main towns can achieve their full economic potential.
- Develop Bandon as a main centre for population and economic growth in accordance with the overall strategy of this plan.
- Develop Kinsale as a Principal Tourist Attraction where the protection of natural and built heritage assets will be a priority.
- Develop a planning framework for a new settlement at Annaghmore which will provide a mix of uses, including residential, employment and local services.
- Development in villages and rural areas will complement the planned growth in the towns at a scale that respects the setting and character of each village.
- Capitalising on the attractive setting of the Bandon Electoral Area, which includes extensive coastline and estuary, which contain features of historical, cultural and natural significance.
- Promote the development of tourism and the economy, particularly within the towns of Bandon and Kinsale, which are both designated as District Employment Centres.

Table 1 – Submissions received with reference to Annaghmore.

2460         2567         2580         2329         2314         2661         2656         2044           2608         2325         2434         2320         2468         2602         2342         2343           2207         2401         2601         2214         2739         2563         2584         2483           2694         2071         2363         2575         2450         2413         2095         2583           2716         2481         2309         2338         2122         2131         2507         2106           2590         2622         2300         2119         2484         2418         2749         2060           2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2552         2733         2089         2457         2309         2341         2193         2636           2552         2733         2089         2457 <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th>								
2207         2401         2601         2214         2739         2563         2584         2483           2694         2071         2363         2575         2450         2413         2095         2583           2716         2481         2309         2338         2122         2131         2507         2106           2590         2622         2300         2119         2484         2418         2749         2060           2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384 <td>2460</td> <td>2567</td> <td>2580</td> <td>2329</td> <td>2314</td> <td>2661</td> <td>2656</td> <td>2044</td>	2460	2567	2580	2329	2314	2661	2656	2044
2694         2071         2363         2575         2450         2413         2095         2583           2716         2481         2309         2338         2122         2131         2507         2106           2590         2622         2300         2119         2484         2418         2749         2060           2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197 <td>2608</td> <td>2325</td> <td>2434</td> <td>2320</td> <td>2468</td> <td>2602</td> <td>2342</td> <td>2343</td>	2608	2325	2434	2320	2468	2602	2342	2343
2716         2481         2309         2338         2122         2131         2507         2106           2590         2622         2300         2119         2484         2418         2749         2060           2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746 <td>2207</td> <td>2401</td> <td>2601</td> <td>2214</td> <td>2739</td> <td>2563</td> <td>2584</td> <td>2483</td>	2207	2401	2601	2214	2739	2563	2584	2483
2590         2622         2300         2119         2484         2418         2749         2060           2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649 <td>2694</td> <td>2071</td> <td>2363</td> <td>2575</td> <td>2450</td> <td>2413</td> <td>2095</td> <td>2583</td>	2694	2071	2363	2575	2450	2413	2095	2583
2321         2391         2052         2337         2306         2738         2703         2051           2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649         2631         2212         2579         2471           2654         2585         2410         2406 <td>2716</td> <td>2481</td> <td>2309</td> <td>2338</td> <td>2122</td> <td>2131</td> <td>2507</td> <td>2106</td>	2716	2481	2309	2338	2122	2131	2507	2106
2626         2561         2303         2407         2068         2594         2767         2427           2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649         2631         2212         2579         2471           2654         2585         2410         2406         2742         2057         2657         2297           2316         2722         2449         2508 <td>2590</td> <td>2622</td> <td>2300</td> <td>2119</td> <td>2484</td> <td>2418</td> <td>2749</td> <td>2060</td>	2590	2622	2300	2119	2484	2418	2749	2060
2171         2498         2307         2103         2547         2126         2317         2459           2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649         2631         2212         2579         2471           2654         2585         2410         2406         2742         2057         2657         2297           2316         2722         2449         2508         2536         2542         2645         2556           2706         2740         2386         2705 <td>2321</td> <td>2391</td> <td>2052</td> <td>2337</td> <td>2306</td> <td>2738</td> <td>2703</td> <td>2051</td>	2321	2391	2052	2337	2306	2738	2703	2051
2058         2147         2211         2696         2638         2455         2107         2734           2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649         2631         2212         2579         2471           2654         2585         2410         2406         2742         2057         2657         2297           2316         2722         2449         2508         2536         2542         2645         2556           2706         2740         2386         2705         2050         2647         2718         2069           2067         2494         2496         2502 <td>2626</td> <td>2561</td> <td>2303</td> <td>2407</td> <td>2068</td> <td>2594</td> <td>2767</td> <td>2427</td>	2626	2561	2303	2407	2068	2594	2767	2427
2552         2733         2089         2457         2309         2341         2193         2636           2356         2296         2456         2328         2339         2637         2387         2346           2090         2730         2353         2384         2383         2382         2707         2202           2535         2538         2419         2197         2787         2055         2553         2625           2173         2128         2206         2746         2354         2344         2592         2104           2113         2373         2358         2649         2631         2212         2579         2471           2654         2585         2410         2406         2742         2057         2657         2297           2316         2722         2449         2508         2536         2542         2645         2556           2706         2740         2386         2705         2050         2647         2718         2069           2067         2494         2496         2502         2495         2216         2215         2144           2721         2659         2453         2393 <td>2171</td> <td>2498</td> <td>2307</td> <td>2103</td> <td>2547</td> <td>2126</td> <td>2317</td> <td>2459</td>	2171	2498	2307	2103	2547	2126	2317	2459
2356       2296       2456       2328       2339       2637       2387       2346         2090       2730       2353       2384       2383       2382       2707       2202         2535       2538       2419       2197       2787       2055       2553       2625         2173       2128       2206       2746       2354       2344       2592       2104         2113       2373       2358       2649       2631       2212       2579       2471         2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120 </td <td>2058</td> <td>2147</td> <td>2211</td> <td>2696</td> <td>2638</td> <td>2455</td> <td>2107</td> <td>2734</td>	2058	2147	2211	2696	2638	2455	2107	2734
2090       2730       2353       2384       2383       2382       2707       2202         2535       2538       2419       2197       2787       2055       2553       2625         2173       2128       2206       2746       2354       2344       2592       2104         2113       2373       2358       2649       2631       2212       2579       2471         2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474 </td <td>2552</td> <td>2733</td> <td>2089</td> <td>2457</td> <td>2309</td> <td>2341</td> <td>2193</td> <td>2636</td>	2552	2733	2089	2457	2309	2341	2193	2636
2535       2538       2419       2197       2787       2055       2553       2625         2173       2128       2206       2746       2354       2344       2592       2104         2113       2373       2358       2649       2631       2212       2579       2471         2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589 </td <td>2356</td> <td>2296</td> <td>2456</td> <td>2328</td> <td>2339</td> <td>2637</td> <td>2387</td> <td>2346</td>	2356	2296	2456	2328	2339	2637	2387	2346
2173       2128       2206       2746       2354       2344       2592       2104         2113       2373       2358       2649       2631       2212       2579       2471         2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2090	2730	2353	2384	2383	2382	2707	2202
2113       2373       2358       2649       2631       2212       2579       2471         2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2535	2538	2419	2197	2787	2055	2553	2625
2654       2585       2410       2406       2742       2057       2657       2297         2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2173	2128	2206	2746	2354	2344	2592	2104
2316       2722       2449       2508       2536       2542       2645       2556         2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2113	2373	2358	2649	2631	2212	2579	2471
2706       2740       2386       2705       2050       2647       2718       2069         2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2654	2585	2410	2406	2742	2057	2657	2297
2067       2494       2496       2502       2495       2216       2215       2144         2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2316	2722	2449	2508	2536	2542	2645	2556
2721       2659       2453       2393       2319       2558       2587       2380         2311       2217       2205       2204       2392       2402       2219       2196         2352       2345       2120       2420       2091       2577       2349       2423         2554       2096       2474       2046       2648       2372       2660       2098         2701       2596       2589       2770       2467       2537       2062       2702	2706	2740	2386	2705	2050	2647	2718	2069
2311     2217     2205     2204     2392     2402     2219     2196       2352     2345     2120     2420     2091     2577     2349     2423       2554     2096     2474     2046     2648     2372     2660     2098       2701     2596     2589     2770     2467     2537     2062     2702	2067	2494	2496	2502	2495	2216	2215	2144
2352     2345     2120     2420     2091     2577     2349     2423       2554     2096     2474     2046     2648     2372     2660     2098       2701     2596     2589     2770     2467     2537     2062     2702	2721	2659	2453	2393	2319	2558	2587	2380
2554     2096     2474     2046     2648     2372     2660     2098       2701     2596     2589     2770     2467     2537     2062     2702	2311	2217	2205	2204	2392	2402	2219	2196
2701     2596     2589     2770     2467     2537     2062     2702	2352	2345	2120	2420	2091	2577	2349	2423
	2554	2096	2474	2046	2648	2372	2660	2098
2061 2743 2220 2066 2315 2301 2053 2586	2701	2596	2589	2770	2467	2537	2062	2702
	2061	2743	2220	2066	2315	2301	2053	2586

2448	2136	2134	2143	2135	2123	2137	2142
2085	2428	2199	2200	2736	2499	2357	2355
2172	2367	2116	2451	2366	2350	2632	2633
2588	2747	2394	2404	2431	2133	2139	2141
2138	2140	2729	2624	2720	2436	2322	2501
2723	2364	2351	2724	2725	2454	2298	2672
2550	2170	2312	2728	2110	2726	2005	2697
2323	2581	2559	2093	2591	2662	2539	2059
2576	2304	2408	2769	2655	2582	2063	2612
2166	2389	2112	2370	2336	2221	2152	2331
2735	2305	2500	2368	2361	2064	2652	2415
2766	2651	2458	2004	2462	2330	2041	2719
2565	2774	2775	2571	2605	2695	2759	2777
2621	2618	2479	2595	2640	2745	2699	2755
2714	2616	2768	2752	2748	2600	2782	2570
2763	2663	2568	2779	2754	2753	2603	2700
2756	2753	2778	2593	2710	2606	2761	2623
2614	2650	2630	2610	2744	2713	2762	2751
2750	2760	2615	2572	2658	2566	2704	2564
2764	2613	2574	2776	2765	2757	2617	2709
2619	2569	2698	2611	2712	2758	2708	2607
2773	2641	2711	2620	2375	2117	2308	2150
2426	2403	2077	2425	2118	2348	2151	2409
2114	2195	2146	2597	2094	2313	2717	2629
2578	2543	2544	2167	2452	2642	2693	2635
2445	2444	2443	2377	2109	2487	2486	2381
2108	2130	2340	2145	2715	2153	2154	2360

2129	2335	2149	2374	2790	2148	2369	2488
2416	2310	2115	2032	2076	2732	2347	2132
2422	2491	2492	2493	2505	2504	2105	2497
2509	2503	2127	2121	2155	2643	2644	2362
2111	2203	2634	2475	2056	2097	2599	2562
2463	2435	2411	2324	2555	2194	2086	2667
2461	2627	2065	2432	2727	2731	2365	2385
2390	2371	2332	2653	2424	2477	2557	2540
2689	2442	2092	2099	2430	2741	2447	2359
2473	2213	2209	2480	2470	2482	2054	2421
2218	2208	2472	2609	2405	2466	2465	2598
2737	2417	2646	2070	2604	2433	2379	2210
2334	2545	2102	2125	2476	2489	2414	2388
2485	2124	2771	2412	2772	2546	2326	2793
2399	2400	2024	2043	2045	2551	2302	2464
2718	2560	2523	2299	2541			