



An
Bord
Pleanála

Inspector's Report ABP-306532-20

Development	Multi-Purpose Sports, Exhibition & Education Facility, 2 no. ancillary buildings & site development works
Location	Curraheen, Curraheen Road, Cork
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	19/5372
Applicant(s)	Munster Agricultural Society CLG
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	First & Third Party
Appellant(s)	Jeanette de Groot Munster Agricultural Society CLG Michael & Margaret O'Sullivan & Others
Observer(s)	Department of Defence
Date of Site Inspection	24 th March 2020
Inspector	Kevin Moore

1.0 Site Location and Description

- 1.1. The site of the proposed development is located in Curraheen to the south of the N40 National Primary Road, approximately 7km south-west of Cork City Centre and 4km south-east of Ballincollig. The site comprises what is known at present as Cork Showgrounds, which hosts activities throughout the year, including the Cork Summer Show. The site is c.10.21 hectares in area and it comprises four fields and a riparian strip along the Curraheen River. The river runs to the north and west of the site. The confluence of the Curraheen and Maglin Rivers is immediately to the north-west of the site. Access to the site is via an existing field entrance to the south onto the Curraheen Road. Development in the vicinity comprises mainly linear housing along the road network to the south and west. There are farm buildings to the north between the site and the N40 which are used for the storage of equipment and ancillary use during the Summer Show and lands to the east are owned by University College Cork's Horticultural Department.

2.0 Proposed Development

- 2.1. The proposed multi-purpose facility would be two storeys in height and would provide three exhibition halls, tiered seating, a restaurant/lounge with an outdoor terrace, a kitchen, changing facilities, office/administration facilities and toilets. Solar panels would be provided on the rooftop. The ancillary buildings would include a single-storey multi-purpose storage and livestock shed and a single-storey service building that would consist of a generator room, an ESB substation and toilets. Ancillary site development works would include a marshalling area, internal circulation roads, surface car parking, a bicycle shelter, landscaping, an underground water treatment system, a temporary underground effluent holding tank and tertiary treatment percolation tanks. The proposal would also make provision for a new bus stop and shelter on the Curraheen Road and for the upgrade of the Curraheen Road to provide for the continuation of the existing footpath. New vehicular and pedestrian accesses would be provided onto the Curraheen Road.
- 2.2. The main building would have a gross floor area of 6,489 square metres and would comprise a large open flexible hall space located to the north of an internal street. It would have a clear height of 9 metres below the main roof structure and would have

clear spans of 68 metres east-west and 36 metres north-south. The facilities to the south of the internal street would include the main entrance, office/reception facilities, sanitary facilities, changing rooms, the boardroom, restaurant and kitchen facilities. The ancillary storage building would be located to the west of the main building and would be used for storage of large equipment, bulk storage of sand and other temporary flooring materials, support for animals, etc. It would have a floor area of approximately 1,612 square metres. The marshalling yard would be provided between the main building and the storage building. The proposed development would be served by a mains water supply and an on-site waste water treatment plant.

- 2.3. Details submitted with the application include a covering letter setting out information on the applicant (including its voluntary status) and the intended uses for the facility, consent letters, the Constitution and Articles of Association of the applicant, a Planning Statement, an Environmental Impact Assessment Screening Report, 3D CGI views, an Architectural Design Statement, an Engineering Report, an Archaeological Assessment, a Flood Risk Assessment, a Traffic and Transport Assessment, a Mobility Management Plan, an Ecological Impact Assessment and AA Screening, an Environmental Management Plan, and a Landscape Development Report.

3.0 Planning Authority Decision

3.1. Decision

On 14th January 2020, Cork County Council decided to grant permission for the proposed development subject to 42 conditions.

Condition 2 was as follows:

2. *The development shall be used solely for the uses and events stated within the documentation submitted with the application to the Planning Authority on the 29/05/2019 and the 11/12/2019 except for examination hall use. In the interests of clarity the development shall not be used as an examination hall or for public concerts or entertainment events.*

Reason: *Such uses did not form part of the development as applied for as described in the public notice and the Planning Authority is not satisfied that the applicant has adequately demonstrated to the Planning Authority the traffic impacts of such an educational use at this time.*

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planner noted the site's planning history, the planning policy context, reports received, and third party submissions made. It was noted that no permission had been granted to the applicant to date to use the land as a showground and it was submitted that any uses outside of the Cork Summer Show are likely to be unauthorised. Referencing Development Plan provisions, it was submitted that in principle the establishment of showground and ancillary facilities is provided for. It was considered that the key issues relate to the use and scale of the development. It was acknowledged that the site is now within the planning authority area for Cork City Council and its submission was noted. It was considered that the rationale and justification for intended uses of the development should be intrinsically linked to the operations of a 'Showground'. The nature and format of the Cork Summer Show was seen as not justifying the scale of the building proposed. It was noted that the site is within the Metropolitan Greenbelt and that there is no objective to include the lands within a major urban quarter. It was further noted that lands currently set out for show jumping are excluded from the planning application site. The design of the proposal was considered acceptable. While acknowledging that the proposal is likely to impact on residential amenity, it was noted that the site has been identified for the establishment of a Showground. Deficiencies of the road and transportation infrastructure were noted and it was considered that the proposal could be seen to be premature given it is most likely going to generate car-based trips. It was questioned whether the development of the use, nature and scale proposed would be consistent with the objective for the land and it was submitted that there is a case to refuse the application. It was also submitted that further information and clarity could be sought on the principle of the development, traffic and transport, and other matters. The Planner concluded by offering the Senior Planner a refusal of

permission for two reasons relating to the proposal being inconsistent with the objective for the lands and the impact on the national road network or requesting further information.

The Senior Planner accepted that a mandatory EIAR was not required. Concern was raised about the scale, nature and use of the proposal. The Senior Planner concurred with the conclusions of the Planner to refuse permission.

3.2.2. Other Technical Reports

The Public Lighting Engineer requested further details on lighting provisions.

The Archaeologist recommended that further information be sought relating to archaeological testing across the proposed development and targeting the results of the applicant's geophysical survey.

The Area Engineer, on the issue of traffic, recommended that proposals for the construction of a new footpath along the road frontage of the site as far as the existing footpath to the east be provided, as well as traffic calming proposals for Curraheen Road and restrictions on Clash Road, additional traffic information on trade shows and educational events, and the submission of a Construction Management Plan. Details were requested on surface water relating to pedestrian safety associated with open attenuation ponds and clarification on discharge from the open drain to the front of the site. Concern was raised about the estimated rise in flood level. Regarding effluent treatment, reference was made to difficult site conditions and pollution of surface water, proposed complicated treatment provisions, the small size of the proposed percolation area, the functionality of the proposed separate holding tank, and the suitability of locating the treatment plant in hard standing. Further information was also recommended on the proposed effluent treatment system as a consequence.

The Heritage Officer raised no concerns in relation to potential impacts on European sites, referred to provisions relating to protection of watercourses, and noted the proposals to remove hedgerow and the landscaping proposals. It was considered that the proposal would not impact on habitats of high diversity importance and it was concluded that proposal would not adversely impact on bats, otters and birds.

The Environment Engineer issued a report after the issuing of further information and stated there were no further details to request.

3.3. Prescribed Bodies

Inland Fisheries Ireland stated it had no objection to the disposal of effluent to percolation provided both treatment and percolation is to an appropriate acceptable standard. It was further requested that planning conditions require that there is no interference with bridging, draining or culverting of the adjacent river or any watercourse, its banks or bankside vegetation.

The Health Service Executive set out general requirements for food businesses to meet and legislation to be complied with.

Cork City Council raised concerns that the proposal may undermine existing and proposed venues in the city centre, including the proposed Events Centre and the existing Cork Opera House. The scale of the development was also considered excessive given the rural context and the limited accessibility to public transport and for walking and cycling. The exacerbation of traffic congestion in the area and on national road junctions was also referenced. Insufficiency of the transport assessment and traffic impacts were referred to. A schedule of further information relating to uses, justification in the context of policy, a revised traffic and transport assessment, proposals on control of traffic speeds, a revised Road Safety Audit, and pedestrian provisions was recommended.

The Irish Aviation Authority advised that it had no observations on the application.

Transport Infrastructure Ireland submitted that the proposal is at variance with official policy in relation to control of development on/affecting national roads and referenced insufficient data and the inadequacy of the traffic and transport assessment.

3.4. Third Party Observations

Objections to the proposal were received from Tim and Carmel Corcoran, Jeanette De Groot, Jim De Groot, Michael and Margaret O'Sullivan, Elsie Strand, Anthony and Mary Aylward, John Mulholland, and Seamus and Breda Kelly. Issues raised related to traffic impacts, impacts on residential amenities, health impacts, impacts on watercourses, visual impact, flooding, inadequate telecommunications service, absence of a master plan, and construction working hours.

Following the recommendation to refuse planning permission, the Divisional Manager, noting objective RCI 5-7 of the County Development Plan, submitted that Development Plans over many years have recognised that there are certain types of development which may not be appropriate in zoned lands and which may be acceptable in the greenbelt and that the provision is not restricted to existing facilities in the greenbelt and could apply to new developments. It was also submitted that it is likely that the lands adjoining the site and north of the N40 will be developed and will be served by a high capacity public transport corridor in due course. Noting the use of the lands by the applicant since 2012, it was considered that Section 4.5.8 of the Development Plan was relevant as provision is made for appropriate expansion / intensification of uses. Noting the applicant's list of proposed uses, it was submitted that these would not impact significantly on a new events centre in the city and that a facility of the scale proposed could not easily be accommodated on zoned lands. It was considered that, in the event a decision is taken to grant permission, conditions can be attached which would outline permitted uses that would address concerns. It was concluded that, notwithstanding the report of the Senior Planner, further information would be sought.

Following this report the Planner drew up a schedule of further information and a request for further information was made on 22nd July 2019. A response to this request was received on 10th December 2019 and this included details on the nature, scale and use of the proposal, a revised Traffic and Transport Assessment, a Stage 1 Road Safety Audit, a Construction Environmental Management Plan, a Lighting Report, and an Archaeological Report. Unsolicited further information relating to the proposed gravel percolation bed associated with the proposed tertiary water treatment system was submitted on 11th December 2019.

The reports to the planning authority following receipt of this information were as follows:

The Environment Section expressed concerns relating to the impact of effluent disposal on the Curraheen River and considered the applicant should commence the process of attaining a Section 4 licence from Cork City Council. It was also submitted that the applicant should revisit its wastewater options and recommended that the

applicant submit a comprehensive Life Cycle Cost-Benefit Analysis of a connection to sewer v. on-site treatment, with regard to both monetary and environmental benefits. Reconsideration of the surface water collection system and disposal arrangements from the marshalling yard was also requested. Clarification on how the proposed slatted unit would comply with relevant specifications and distances from dwellings was recommended.

In a second Environment Report it was concluded that there was no objection to the grant of permission on environmental grounds subject to a schedule of conditions being attached.

The Public Lighting Section had no objection to the grant of permission subject to a schedule of conditions.

The Archaeologist recommended that permission be granted subject to a schedule of conditions.

The Engineering Report concluded that there was no objection to permission being granted subject to a schedule of conditions.

The Ecology Office Planner concluded that there is no objection to permission being granted subject to the attachment of two conditions.

The Roads Section highlighted several traffic and transport concerns in terms of peak flows, queuing, impact on the N40, etc. Reference was made to the preparation of a number of management plans. A grant of permission was recommended subject to a schedule of conditions.

Transport Infrastructure Ireland stated that it would rely on the planning authority to abide by official policy in relation to development affecting national roads subject to the proposal being undertaken in accordance with the recommendations of the Transport Assessment and events not commencing before 10.00 on a weekday or at the weekend.

The Planner noted the reports received and the content therein relative to the further information received. It was noted that the applicant had no objection to the imposition of a condition restricting the proposed use of the building and prohibiting the staging of concerts. It was considered that the use of the facility for examinations should be omitted until the impacts of such a use can be clearly demonstrated. A

schedule of conditions was set out in the event a decision to grant permission was to be made.

The Senior Planner submitted that the further information response successfully addressed the issues highlighted in the original assessment and it was considered that the outstanding issues could be addressed by way of condition. It was agreed that the exam use should be omitted. A grant of permission was recommended subject to a schedule of conditions.

4.0 Planning History

P.A. Ref. 13/4512

Permission was granted for the construction of an internal roadway and the erection of a new boundary wall to St. Joseph's Villas and to retain the existing entrances at Curraheen Road.

5.0 Policy Context

5.1. Cork County Development Plan 2014

Metropolitan Greenbelt

Objectives include:

RCI 5-1: Metropolitan Cork Greenbelt

Maintain the Metropolitan Cork Greenbelt (as shown on Figure 4.1 in this Plan) which encompasses the City and its suburbs together with the satellite towns, villages and countryside of Metropolitan Cork.

RCI 5-2: Purpose of Greenbelt

a) Maintain a Green Belt for Metropolitan Cork with the purposes of retaining the open and rural character of lands between and adjacent to urban areas, maintaining the clear distinction between urban areas and the countryside, to prevent urban sprawl and the coalescence of built up areas, to focus attention on lands within settlements which are zoned for development and provide for appropriate land uses that protect the physical and visual amenity of the area.

RCI 5-3: Land Uses within Metropolitan Greenbelt

Preserve the character of the Metropolitan Greenbelt as established in this Plan and to reserve generally for use as agriculture, open space, recreation uses and protection / enhancement of biodiversity of those lands that lie within it.

RCI 5-6: Long Established Uses

Recognise the requirements of long established commercial or institutional uses located entirely within the Greenbelt which may make proposals for expansion / intensification of existing uses. Such expansion proposals of an appropriate scale would only be considered in special circumstances, having regard to the overall function and open character of the Greenbelt and where development would be in accordance with normal proper planning and sustainable development considerations.

RCI 5-7: Strategic and Exceptional Development

Recognise that there may be development of a strategic and exceptional nature that may not be suitably located within zoned lands and that such development may be accommodated successfully in Greenbelt locations. In such circumstances, the impact on the specific functions and open character of the Greenbelt should be minimised. During the lifetime of the plan consideration will be given to the establishment of a Showgrounds, and ancillary facilities, located on the Munster Agricultural Society grounds, at Curraheen.

Transport

Objectives include:

TM 3-1: National Road Network

...

e) Prevent the undermining of the strategic transport function of national roads and to protect the capacity of the interchanges in the County from locally generated traffic.

5.2. **Ballincollig Carrigaline Municipal District Local Area Plan**

Cork City South Environs

Population and Housing

The Plan notes in Section 3.5.89:

The Munster Agricultural Society has established a Showgrounds and ancillary facilities at Curraheen. This use is supported under Chapter 4 of the current County Development Plan (CDP). The current CDP under objectives RCI 5-6 and RCI 5-7, subject to normal planning considerations, recognise the requirements of long established commercial or institutional uses located entirely within the Metropolitan Greenbelt, as well as the needs of uses that are strategic and exceptional in nature that may not be suitably located within zoned lands. Requirements of such established uses can include operational matters and structures / ancillary facilities.

Community Facilities

The Plan notes in Section 3.5.96:

Munster Agricultural Show Grounds are located on a large site which lies north and east of Curraheen Village between the N40 and Curraheen Road. The site is host to many public events throughout the year.

5.3. **Appropriate Assessment**

The site of the proposed development is located approximately 12km upstream from the Cork Harbour Special Protection Area. There is hydrological connectivity with the SPA by way of the Curraheen River. Having regard to the separation distance, it is reasonable to screen out the potential for construction works and the operation of the facility to impact on feeding habits used by species for which the SPA is designated. Furthermore, due to the separation distance, there is no potential for the construction or operational phases to cause displacement or disturbance to the bird species for

which the SPA is designated. I note, furthermore, the site has no hydrological connection with the Great Island Channel Special Area of Conservation.

It is reasonable to conclude that, on the basis of the information on the file which I consider adequate in order to issue a screening determination, the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any designated European Site and a Stage 2 Appropriate Assessment and submission of a NIS is not therefore required.

5.4. Environmental Impact Assessment

The proposed development is not a project defined by Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations that requires a mandatory Environmental Impact Assessment Report. Having regard to the nature, extent, and character of the likely impacts arising from the proposed development, it is considered that there is no real likelihood of significant effects on the environment requiring EIA.

6.0 The Appeals

6.1. Grounds of Appeal from Jeanette De Groot

The appellant resides on Clash Road to the west of the site. The grounds of the appeal may be summarised as follows:

- The proposed buildings would completely block views and daylight.
- The area is flat and floods regularly and is not suitable for the proposal with cattle sheds and slurry tanks with bad smells.
- The residents of Clash Road own half of the river bounding the site, with full access to it by children. No boundary fence can be erected on the residents' lands.

- The site has five large empty fields and there is no need to place buildings so close to residents. The area next to the motorway would not be near houses or rivers.
- There is extensive wildlife in the river and grassland and the country area should be preserved.
- There is no gas, sewage or street lighting on Clash Road.
- The residents have suffered with noise and lighting from the development of the motorway nearby.
- The appellant concludes by requesting that the Greenbelt be kept.

6.2. **Grounds of Appeal from Munster Agricultural Society**

The grounds of appeal relate to the attachment of Condition 2 of the planning authority's decision. The grounds of the appeal may be synthesised as follows:

- While there is no objection to the restriction on public concerts and entertainment events, the restriction on examination hall use is requested to be removed. The applicant has established a pressing requirement for this use following discussions with the main third level institutions.
- This use is intended to be infrequent in nature and subject to full mobility and traffic management plans developed with the third level institutions.
- A revised traffic analysis is attached with the appeal which demonstrates that, with examination start times of 10.00am, the proposed use would not have an impact on the carrying capacity of the national or local road network. TII has no objection to the examination hall use or any other use subject to a 10.00 start time.
- The Curraheen area is due to undergo major changes in the coming years, including the development of the SLR 7 Strategic Land Reserve to the north, significant transport connectivity upgrades such as a proposed greenway along the N40 and primary cycle routes to the city centre and Ballincollig, upgrades to bus services, a planned Light Rail Transit to the north of the site

through the SLR 7 lands, and the proposed road network within the SLR 7 lands providing a direct link between the appeal site, the Cork Science and Innovation Park and the CIT campus.

- The restriction on events beginning before 10.00 in the morning combined with the mobility management measures will ensure impacts are kept to a minimum.
- A letter of support from University College Cork is attached with the appeal which outlines the main requirements for examination hall use and commits to engaging with the applicant on preparing mobility management plans.

A revised condition is attached for the Board's consideration.

6.3. Grounds of Appeal from Michael and Margaret O'Sullivan & Others

The appellants are residents of Clash Road. The grounds of the appeal may be synopsised as follows:

- There is concern with the sustainability of the development and of the applicant's ability to fund and maintain the property and the site amenities. Reference is made to drone racing being prohibited as it constitutes an invasion of privacy.
- This is an unsustainable location and there is insufficient detail on the ancillary and storage building and on the marshalling area. The use of Condition 31 relating to the slatted tank is unacceptable and major deficiencies are not addressed. The slatted unit is non-compliant with D.A.F.M. requirements. The ancillary and storage building needs to be relocated due to proximity to the river and to houses.
- The relocation of the storage building means that the marshalling area should also be relocated. There is no justification for placing it so close to a river, with the risk of pollution that results.
- The use of on-site foul waste treatment is most unsatisfactory and results in maintenance requirements that are often not addressed subsequently. There is concern that pollution of surface water could occur because of the high

water table. A foul sewer linked to the City Drainage Scheme should be provided for. Temporary provision for portaloo's and temporary drainage holding tanks will cause adverse issues and will not be viable if there is a high number of trade shows.

- Part of the site floods and large areas of the site are periodically under water. In certain areas of the site permeability of surface water is poor. Surface water is to be discharged to the Curraheen River and no assessment has been carried out of the capacity of the river to assimilate the loading. A S4 licence is required and there is no guarantee it will be issued. The removal of a flood plain and the discharge of increased volumes of water to the river north of its confluence with the Maglin River is of concern. A proposed attenuation pond will not function after some years, resulting in surface water drainage issues.
- Noise and odour pollution will need to be addressed.
- Concerns are raised about the status and alignment of the Curraheen Road and access / egress. No improvements are proposed other than traffic calming and the addition of a footpath. The road is unsuitable to cater for the increased traffic. Implementation of a one-way system and orderly control of traffic will be near impossible during mid-week days, particularly during the am and pm peak hours at the junctions on/off the Curraheen Road with the N40.
- The construction working hours are unacceptable as they will be disruptive and should be revised.

6.4. Applicant Responses

The applicant's response to the appeal by Jeanette De Groot may be summarised as follows:

- While located within the Metropolitan Greenbelt, the location is supported by planning policies in both the County Development Plan and Ballincollig Carrigaline Municipal District Local Area Plan. Also, the Draft Cork Metropolitan Area Transport Strategy (CMATS) outlines plans for a key transport corridor that will traverse nearby lands and will eventually be served by a planned Light Rail Transit system.

- The nearest building to the appellant's house is the ancillary building which is comparable to a standard agricultural structure, will be 30 metres to the east and will have no significant impact by way of overshadowing or loss of light. The multi-function hall will be over 100 metres from the western site boundary. The applicant, in hosting the Cork Summer Show, has a track record of hosting the event without any impacts to surrounding residential properties as a result of odour or other nuisances. Flood risk measures will protect vulnerable areas and will not result in significant increase of flood risk elsewhere.
- The proposed development will be largely confined to open improved agricultural grassland habitat that is of lower ecological value. The hedgerow loss to the south will be compensated by the planting of 400m length of native hedgerow. In addition, the landscape master plan will create other new biodiversity supportive habitats. Surface water management proposals will reduce potential risks arising from site associated hydrological or water quality impacts on the Curraheen River.

The applicant's response to the appeal by Michael and Margaret O'Sullivan and others may be summarised as follows:

Sustainable Development

- The ability to fund the development is not a planning issue.
- Restricting the use of the facility for concerts is accepted.
- The use of the site is supported in local development plan policy and the proposal will complement the expansion of the Metropolitan area.
- The surrounding area is to undergo significant changes in the coming decades and is likely to become urban in nature. This area is included in the expanded Cork City administrative area. There is also a Strategic Land Reserve site to the north of the site earmarked for expected growth. The lands will eventually be served by a Light Rail Transit system.

Design and Location of Ancillary Building and Marshalling Area

- The location and layout of the development was subject to detailed design and evaluation.
- The livestock shed will not include a slatted floor with a slurry tank. It is a dry shed where animals would be kept for short periods a few times a year. There would be appropriate bedding and the floor would be washed down after cleaning out, draining to an existing cattle wash tank. The setback for compliance with IS 123 DAFM is not appropriate.
- The marshalling area will be used to disembark animals and animals would be on the concrete yard area for short periods of time. This would be scraped daily on show event days into a slurry tank which will be cleared out at the end of show events. The yard will be power washed. The yard would be drained to a series of gullies, would be cleared out regularly during events, and drainage would be collected in storm drainage pipes that would be attenuated and ultimately discharged to a vegetated bio swale.

Foul Sewer Drainage

- In discussions with Irish Water it was established that it is not currently viable to deal with foul drainage via connection to the public sewer as the nearest connection would be to an existing pumping station over 1km to the north-east.

Curraheen River and Surface Water Drainage

- The surface water drainage has been designed in accordance with best practice sustainable urban drainage design.
- Surface water run-off is to be attenuated to greenfield rates in the western half of the development in an attenuation tank and in the eastern half using an open attenuation pond and permeable paving. Run-off will not take up increased capacity in the river.
- A Flood Risk Assessment was completed and it was found that the post development scenario would not result in a significant rise in flood level or rise in velocity elsewhere.
- The requirement to acquire a discharge licence is acknowledged.

Exposed Attenuation Pond

- There would be a security fence around the north, west and south sides of the attenuation feature and maintenance of the pond would be included in the operational programme of maintenance.

Environmental Matters

- Noise and odours were addressed in the EIA Screening Report and the Construction Environmental Management Plan.
- The one-way traffic system is employed for the Summer Show and is very successful. It has the potential to be used for occasional events.
- Regarding construction working hours, the final CEMP is to be agreed with the planning authority.

6.5. Planning Authority Response

I have no record of any response to the appeals from the planning authority.

6.6. Observations

The Department of Defence submitted that the appeal was forwarded to the Department's office by Cork County Council and that it had no observations to make on the matter.

7.0 Assessment

7.1. Introduction

- 7.1.1 I consider that the planning issues requiring assessment are the principle of the proposed development, the impact on residential amenity, the traffic impact, the impact on the Curraheen River, flooding, and the appropriateness of Condition 2 of the planning authority's decision.

7.2. The Principle of the Proposed Development

7.2.1 The proposed development comprises a two-storey multi-purpose facility. It would accommodate three exhibition halls, tiered seating, a restaurant/lounge with an outdoor terrace, a kitchen, changing facilities, office/administration facilities and toilets. Its ancillary buildings would include a single-storey multi-purpose storage and livestock shed and a single-storey service building. Other ancillary site development works would include a marshalling area, internal circulation roads, surface car parking, a bicycle shelter, landscaping, an underground water treatment system, a temporary underground effluent holding tank and tertiary treatment percolation tanks. The main building is intended to be a multi-purpose sports, exhibition and education facility. It is intended to have a broad range of social, recreational and education purposes. These would include:

- The Cork Summer Show;
- Dairy and meat industry exhibitions and educational events;
- Agricultural and large scale machinery shows;
- Boat shows;
- Construction industry exhibitions and educational events;
- Dog and pet shows;
- Third level examination halls;
- A broad range of sporting events including indoor football, basketball, volleyball, hockey and ice hockey, drone racing, and gymnastics.

7.2.2 I acknowledge the local development plan provisions relating to this site and the operations of the Munster Agricultural Society. These are as follows:

Cork County Development Plan 2014

Metropolitan Greenbelt

Objective RCI 5-7: Strategic and Exceptional Development

Recognise that there may be development of a strategic and exceptional nature that may not be suitably located within zoned lands and that such development may be accommodated successfully in Greenbelt locations. In such circumstances, the

impact on the specific functions and open character of the Greenbelt should be minimised. During the lifetime of the plan consideration will be given to the establishment of a Showgrounds, and ancillary facilities, located on the Munster Agricultural Society grounds, at Curraheen.

Ballincollig Carrigaline Municipal District Local Area Plan

Cork City South Environs

Population and Housing

The Plan notes in Section 3.5.89:

The Munster Agricultural Society has established a Showgrounds and ancillary facilities at Curraheen. This use is supported under Chapter 4 of the current County Development Plan (CDP). The current CDP under objectives RCI 5-6 and RCI 5-7, subject to normal planning considerations, recognise the requirements of long established commercial or institutional uses located entirely within the Metropolitan Greenbelt, as well as the needs of uses that are strategic and exceptional in nature that may not be suitably located within zoned lands. Requirements of such established uses can include operational matters and structures / ancillary facilities.

Community Facilities

The Plan notes in Section 3.5.96:

Munster Agricultural Show Grounds are located on a large site which lies north and east of Curraheen Village between the N40 and Curraheen Road. The site is host to many public events throughout the year.

- 7.2.3 It is evident from the above that the operations of the site by Munster Agricultural Society as agricultural showgrounds is acknowledged in local plan provisions and is supported. Indeed, Objective RCI 5-7 of the County Plan clearly supports the establishment of showgrounds on these lands within the Metropolitan Greenbelt and, thus, a development of that nature is seen to be compatible with the range of uses promoted within the Greenbelt.

7.2.4 In considering the nature, scale and extent of the proposed development, it is imperative that a clear understanding is given to the use 'Showgrounds'. According to Collins Dictionary 'showgrounds' are:

"a large area of land where events such as farming shows or horse riding competitions are held", or

"an open-air setting for agricultural displays, competitions, etc."

7.2.5 It is reasonable to ascertain that 'showgrounds' are understood to primarily relate to agricultural events and may be extended to include agricultural or animal-related shows, competitions and horse riding events. It is my firm understanding that these are the types of uses to which showgrounds are put. The Cork Summer Show is an appropriate example of such a use of 'showgrounds'. The intended show in June of this year was proposing to have zones for livestock, agricultural machinery and equipment, food and drink, gardening, and horses. There were also zones proposed for cars, retail, fashion and wellness, entertainment and for children. I also note that the Munster Agricultural Society was proposing to have an International Championship Dog Show and a Championship All Breed Show in July of this year. These are types of uses one would expect to be associated with the use of 'showgrounds'.

7.2.6 It is my submission to the Board that construction industry exhibitions and educational events, third level examination halls and a broad range of sporting events (including indoor football, basketball, volleyball, hockey and ice hockey, drone racing, and gymnastics) are not showground events where one understands the use of showgrounds on agricultural lands in a rural area. In my opinion, it is very clear that the proposed uses associated with a significant events centre would go well beyond functioning showgrounds and its ancillary development associated with agriculture in this rural area. Furthermore, it goes well beyond the encouragement and promotion of agriculture, the development of this industry, the promotion of education associated with this industry, and the development of scientific pursuits associated with this industry.

7.2.7 In principle, I wholly concur with the view that agricultural showgrounds are best placed in an agricultural area due to the likely scale and range of operations such as the Cork Summer Show, which is a flagship event for agriculture in Cork. Such

development cannot readily be accommodated on zoned urban lands within built-up areas and is best placed in a rural location. However, what is being proposed in the development now before the Board is not the promotion, enhancement and development of the showgrounds in Curraheen but is very clearly a significant events centre and I would strongly emphasise that the nature and extent of many of the intended uses should appropriately occur in the nearby urban centre of Cork City where the infrastructure and necessary complementary services have been developed to meet the needs of such intended event uses. It is my submission to the Board that the form and character of the building designed for this site would not likely be intended to be developed to lie idle for significant periods and would have substantial potential to be used for a very broad range of events, many of which would be best accommodated within serviced urban areas.

7.2.8 The example of the proposed third level examination hall use is a prime example of a most unsustainable use at this location. The proposed multi-purpose building would be sited in a remote rural location. While there is a bus stop in the vicinity of the site, one could not reasonably suggest that this site would be served by public transport to meet the needs of students arriving to this location to undertake examinations. As it stands, this would be almost a wholly car-dependent use. This car dependence would result in substantial volumes of traffic accessing the N40 national route, utilising the nearby slipways where the maximum speed limit applies for this national route. It is suggested by the applicant that uses such as this could be accommodated, with exams not starting before 10am. I put it to the Board that this proposal to start at such a late time further highlights a location that is categorically unsustainable for such a use. Furthermore, one could not contemplate allowing such a development premised upon some possible light rail service that may be developed to the north of this site, on the opposite side of the N40 dual carriageway, at some time well into the future. I put it to the Board that the same could be said for holding ice hockey matches, other sporting events, or other large non-agricultural related exhibitions. This is not the place for such uses, not alone because the lands are located in a poorly serviced, remote rural area but also because the car dependency associated with the functioning of a successful multi-purpose centre of this scale would have very significant adverse consequences for the capacity and efficiency of junctions in the immediate vicinity that serve the N40.

7.2.9 In conclusion, I wholly accept that these lands could reasonably occasionally be used for showgrounds in the true meaning of the term and clearly they have been so used to date. I also wholly accept that showgrounds may reasonably require associated agricultural structures such as storage and animal holding structures and marshalling areas. To expand the range of uses and to develop a large multi-purpose centre would bring a potentially substantial events centre to this remote, rural, unserved location. Such events should appropriately be accommodated in events centres in serviced urban locations, where they are not wholly car-dependent and where they are well served by public transport and may also meet the needs of other road users such as pedestrians and cyclists. It is my submission to the Board that the development of the proposed multi-purpose facility is an unsustainable development at this location. It is not a matter of introducing some minor modifications to the design of the proposed building to address this issue. This building would be misplaced at this location. It would be vastly in excess of what is required to meet the needs of showgrounds. With this understanding, it is clear that the proposed development could not be seen to be compatible with the provisions of Cork County Development Plan. It would be contrary to the objectives set out in this Plan relating to the Metropolitan Greenbelt. Objective RCI 5-7 states that during the lifetime of the plan consideration will be given to the establishment of a Showgrounds, and ancillary facilities, located on the Munster Agricultural Society grounds, at Curraheen. This does not promote or encourage the development of a potentially significant events centre beyond its showground use. Furthermore, it is wholly incompatible with Objective RCI 5-6 because, while the lands at this location have been used as showgrounds and the expansion and intensification of established uses may be facilitated, the development of an events centre for uses not related to showgrounds could not be construed as being consistent with *'the requirements of long established commercial or institutional uses'*, which this objective relates to.

7.2.10 Overall, the proposed multi-purpose facility could not be seen to constitute a sustainable development and would be contrary to the proper planning and development of this rural area, within the Metropolitan Greenbelt immediately to the south of the N40 dual carriageway.

7.3. Impact on Residential Amenity

7.3.1 I note that the Cork Summer Show and other events organised by Munster Agricultural Society have taken place at this site over a number of years. It is reasonable to determine that this site has been functioning as showgrounds and appears as an established venue for events related to the operations of Munster Agricultural Society. Given this position, these functions have altered the character of this area for short periods during events, which in themselves impact on the amenity of established residents. Outside of events, I have no doubt that the site presents as an agricultural holding and the immediate area remains a small rural community. At the time of events, which appear mainly to be agricultural-related, there would be significant volumes of traffic, car parking accommodation, vehicular movements, animal transportation, provision of animal holding areas, exhibition areas, etc. and with this would come large crowds of people, noise, etc. that for the short periods of the events are likely to cause some disturbance and inconvenience to residents of this area. However, as showgrounds in a rural area, one would anticipate that these are the experiences one would gain periodically when residing in proximity to such a venue.

7.3.2 Notwithstanding the above, the proposed development of a multi-purpose sports, exhibition and education facility would introduce very significant changes to this rural community as the function of these lands would extend from periodic agricultural-related daytime activities to include a broad range of sporting events, exhibitions and events unrelated to agriculture, third level examinations, etc. which it can be seen would likely extend beyond a daytime, daylight operation. In my opinion, this facility seeks to become an events centre well beyond an agricultural events centre. I anticipate that this venue would seek to accommodate many more events than is presently accommodated on the lands. As a result, there would likely be large numbers of people coming into this area on a much more regular basis, more regular significant volumes of traffic, increased parking, more regular general disturbance and more inconvenience at a location that is remote from basic services and facilities. This would be a single destination events centre that would likely extend its services well beyond daytime operations. The change in the character of this rural area and the implications for negative impacts on residents along the narrow local roads leading to this site are self-evident in my opinion. If the proposed development

proceeds, it will have significant adverse impacts on the amenities of residents of this area by way of noise, nuisance, general disturbance, light intrusion, etc. Such impacts demonstrate that this is not an appropriate location for establishing an events centre. Its location may demand a need to reinforce and enhance the showgrounds function, improving its services and facilities, but not expanding into other functions that are best placed and best accommodated in serviced urban settlements where there is a substantial population base and catchment, with established regular public transport accessibility, support services, etc.

7.3.3 Finally, having regard to the above considerations, I am satisfied that the development of the showgrounds could reasonably include the enhancement of facilities relating to the functioning of the showgrounds. To this end, one could anticipate the provision of a marshalling area, holding areas, storage sheds, holding tanks, etc. to improve the services for the operators, animal welfare, etc. However, given the nature and extent of the proposed development and the integrated servicing arrangements, etc. in the design and layout of the proposed development, one could not seek to differentiate between various structures in the overall scheme and seek to accommodate and permit those related to the showground use, while excluding and refusing other structures, inclusive of the main building itself.

7.4. Traffic Impact

7.4.1 I have alluded above to the narrow local road network serving these lands. The main access road is a local road to the south which serves linear housing on both sides of the road at this location. It is a poorly aligned road, demonstrated by the continuous white centreline running parallel to the frontage of this site. Access to this road from Cork City is gained from Junction 2 of the N40 National Primary Road to the east. A short distance to the west of the site there is a junction with Clash Road, the road on which the appellants reside. This is a very narrow local road that provides a link northwards over the N40 in the direction of Ballincollig. The regular use of such an inadequate local road network to serve this site as an events centre is apparent. Utilising the facility for the wide range of events proposed would result in significant inconvenience for established road users on the narrow roads by servicing vehicles and those in cars attending events. This would cause substantial interference with

the free flow of traffic on these roads and the development would ultimately create a local traffic hazard during day and night-time use.

7.4.2 A further significant traffic impact arises from the effect of the proposed development on the N40 National Primary Road, the orbital route around the south side of Cork City. If the proposed facility is intended to achieve its purpose it would bring with it increased volumes of traffic on a much more regular basis over longer periods of the day on the road network. The logical catchment for this facility would mainly derive from Cork City to the east and it is evident that there could well be significant impact on the national road network at peak AM and PM periods. Further to this, I note the original submission from Transport Infrastructure Ireland (TII) to the planning authority on this application. TII submitted that the proposal is at variance with official policy in relation to control of development on/affecting national roads and it referenced insufficient data and the inadequacy of the traffic and transport assessment. I accept that a second submission was made by TII following receipt of further information and that its recommendation was subject to events not commencing before 10.00 on weekdays or weekends. Such a restriction would automatically place any proposal for providing examination halls at this site in jeopardy and is another reason why the applicant's proposal for this use is unsustainable. Further to this and given the nature and extent of the intended uses for the facility, I consider that it would be extremely difficult to marshal and enforce such a restriction for the wide range of uses and events being proposed. I maintain that this facility would function within the time periods excluded by such a restriction. For example, I note that the Cork Summer Show commenced for patrons at 9am in 2019. I would have no doubt that other exhibitions may seek to commence before 10am also. The implications for the N40 are self-evident if the proposed development proceeds. There will be increased traffic accessing this site via the junctions on the N40 and such traffic movements will coincide with peak periods on the N40.

7.4.3 I note the provisions of *Spatial Planning and National Roads: Guidelines for Planning Authorities*. This guidance notes that interchanges/junctions are especially important elements of national roads infrastructure that must be carefully managed. It is noted that it is a key objective of road planning to protect and maintain a satisfactory level of service at such junctions for road users. Compromising the capacity and efficiency

of the national road and its associated junctions and reducing the level of service to road users should be avoided. Developing a significant events centre in a rural area alongside the N40 remote from a serviced urban settlement with associated support facilities could not be seen to espouse the provisions of these Guidelines. It is my submission to the Board that the intended facility would likely adversely affect the N40 National Primary Road by the significant volumes of traffic that would be generated on a more regular basis throughout the day, inclusive of during peak periods. Because the functioning of the proposed development would be almost entirely car-dependent, there is no reasonable way of substantially alleviating this adverse impact for the national road network.

7.4.4 Further to the Guidelines, I note the objectives set out in Cork County Development Plan as they relate to transportation. Objective TM 3-1 seeks the prevention of the undermining of the strategic transport function of national roads and to protect the capacity of the interchanges in the County from locally generated traffic. It is my submission that allowing this proposed development to proceed, in such close proximity to key interchanges on the N40 orbital route and having regard to such reliance on this National Primary Road to serve the development, would be completely contrary to this objective.

7.4.5 Overall, it may reasonably be determined that the proposed multi-purpose facility would likely generate a traffic hazard because of the poor local road network directly serving it and the consequential adverse impact for established road users and because it would have significant adverse impacts on the function of the N40 National Primary Road, an orbital route for the south side of Cork City.

7.5. Impact on the Curraheen River

7.5.1 I note once again that this site has functioned, and continues to function, as showgrounds. In accommodating agricultural-related events, it has provided for the holding and marshalling of animals and for a range of other activities involving the gathering of people, animals, machinery, etc. There is no reason to suggest that the use of these fields as showgrounds has had any adverse impact on the water quality of the Curraheen River to date or any adverse impact on the biodiversity associated with this or any other waterbody. The continued use of the lands for this purpose

would appear to pose no particular concern for the river. Further to this, I would anticipate that the enhancement of facilities to accommodate such development, in the form of a marshalling area, holding pens, storage, etc. could reasonably be seen to improve upon the conditions of the site at times of events in a manner that would further protect the quality of the waterbody along the perimeter of this site. I note that the applicant has explained the purpose of the marshalling area and building closest to the residents on Clash Road on the west side of the site. The livestock shed would not include a slatted floor with a slurry tank. It would be a dry shed where animals would be kept for short periods a few times a year, with bedding and where the floor would be washed down after cleaning out, draining to an existing cattle wash tank. The marshalling area would be used to disembark animals and animals would be on the concrete yard area for short periods of time. This is a rural area, developments of this nature would be relatively commonplace in such locations, and the regularity of use of such structures would be limited. I do not have any particular concerns about the functioning of such facilities in this location either for the nearby river or for the impact on the amenities of residents in the housing lining Clash Road at this location. These are reasonable measures to provide for the orderly development and arrangement of showground events.

7.5.2 With regard to the proposed multi-purpose facility, I note that there are substantial provisions for the control of surface waters, inclusive of attenuation measures. It is apparent that there would be substantial impermeable surfaces introduced and they could potentially impact on the run-off from the site to the river. The applicant, however, proposes a range of measures to significantly address surface water concerns, inclusive of a site retention pond and an underground attenuation storage system. These measures are anticipated to adequately control surface water impacts on the nearby waterbody. With regard to foul effluent, I note that the proposed facility would not be served by a public foul main. An on-site private wastewater treatment plant is proposed to be installed. This would be intended to treat and dispose of foul waste which would be discharged to a percolation area. A temporary effluent holding tank would also be provided for use during the summer show when up to 50,000 visitors would arrive and effluent entering the treatment plant would be diverted to this tank during the show period. The wastewater treatment plant is intended to be operated under a discharge licence. I note the applicant's submissions in relation to

on-site treatment. The trial hole evaluation indicated that the subsoil on this site is not suitable for waste water because the seasonal watertable rises to 0.5m. I have serious concerns about the use of a private waste water treatment plant on these lands with a high water table and likely saturated soil conditions, where there would be likely ponding arising, which could pose a pollution threat to the adjoining river. Such outcomes reinforce the unsustainability of the proposed multi-purpose facility, whereby the needs of such a facility accommodating a wide range of events on a regular basis would be best placed in a serviced area in the interest of pollution prevention.

7.6. Flooding

- 7.6.1 I note the established use of these lands as showgrounds and I do not consider that this continued use causes particular concerns about increasing flooding of the lands or causing flooding beyond the site. Also, I would anticipate that the enhancement of facilities to accommodate showground-related development, such as a marshalling area, holding pens, storage, etc. could reasonably be designed, developed and managed to improve upon site conditions such that potential flooding is alleviated.
- 7.6.2 With regard to the proposed multi-purpose facility, I note that the applicant submitted a Flood Risk Assessment and this assessment had due regard to *The Planning System and Flood Risk Management: Guidelines for Planning Authorities*. This Assessment noted that the OPW flood mapping website indicated a flood risk for extreme events to the north of the site. Ponding at a low point on the site was also acknowledged by the applicant. It was further noted from OPW Flood Mapping that flooding events occurred in the wider area, including at the junction of the Curraheen and Clash Roads.
- 7.6.3 I note that the proposed development would be located outside of any Flood Zone A area. The indicative flood mapping for the 1 in 100 year return does not encroach on the site for the proposed development, while the mapping for the 1 in 1000 year return period encroaches on some of the access roads and car park proposed in the northern portion of the site. I note that the applicant's assessment included a hydrological assessment and hydraulic analysis. I observe that the proposed development has been laid out in a manner which ensures that the more vulnerable

buildings associated with the overall development would avoid the flood risk zones. A Justification Test was applied to the development in accordance with the Guidelines due to the predicted 1 in 1000 event flooding encroaching on the proposed ancillary building and a section of the proposed marshalling yard to the west of the main building. It is noted that ground to the west of the proposed development would be proposed to be raised and reprofiled to protect the remaining vulnerable parts of the development. As a result of this mitigation measure, there is an avoidance of the Flood Zone B area at the north-western corner of the site and this would move the ancillary building and marshalling yard out of the Flood Zone B area. The applicant's analysis also determined that the reprofiling of the ground would result in no perceptible increase in flood level to the south, upstream of the proposed development and would, therefore, not result in increased flooding further south where flooding incidents have occurred in the past. The applicant's analysis further determines that no significant increase in neighbouring lands to the east would occur and that there would be no rise in velocity in the river channel outside of the site. The applicant's proposed surface water management system is expected to mitigate flood risks from the development, while accommodating any pluvial or groundwater flow pathways.

7.6.4 As a result of the assessment undertaken, the design and layout of the proposed development, and the mitigation measures proposed to be employed, I do not consider that there would likely be any significant residual flood risks arising from the proposed development.

7.7. The Appropriateness of Condition 2

7.7.1 The Board will note that I consider that the proposed multi-purpose sports, exhibition and education facility would be misplaced at this location and would be an unsustainable development in this rural area. It will also be noted that I have earlier in this assessment submitted that the proposed examination hall use of the facility in itself would be an unsustainable use. The site of the proposed development is in a remote rural area. It is nowhere near third level institutions. It is not served by public transport to any satisfactory level. If students were required to undertake their examinations at this location it would be a necessity for them to be transported by

cars to this remote venue. The public bus service is inadequate to serve the needs of students in such a case where examinations would be ongoing throughout the day over several weeks. This is not a use for which some type of mobility management plan can readily be employed and that students congregate somewhere on a college campus and get bussed to this remote, unserviced venue to allow them to take their examinations or where some other communal transportation arrangement is put in place. It is not a viable, sustainable use to be pursued at this rural location.

Furthermore, imposing a limitation from 10am before examinations could start would not alter in any manner the unsustainability of this use at this location.

8.0 Recommendation

8.1. I recommend that permission is refused for the following reasons and considerations.

9.0 Reasons and Considerations

1. The site of the proposed development is located within the Metropolitan Greenbelt for Cork City in an unserviced remote rural location. It is an objective of Cork County Development Plan to reserve the character of the Metropolitan Greenbelt and to reserve generally for use as agriculture, open space, recreation uses and protection/enhancement of biodiversity of those lands that lie within it (Objective RCI 5-3). It is also an objective of the Plan to recognise the requirements of long established commercial or institutional uses located entirely within the Greenbelt which may make proposals for expansion/intensification of existing uses, where such expansion proposals of an appropriate scale would only be considered in special circumstances, having regard to the overall function and open character of the Greenbelt and where development would be in accordance with normal proper planning and sustainable development considerations (Objective RCI 5-6). Furthermore, it is an objective to recognise that there may be development of a strategic and exceptional nature that may not be suitably located within zoned lands and that such development may be accommodated successfully in Greenbelt locations,

and wherein it is stated that, during the lifetime of the Plan consideration will be given to the establishment of a Showgrounds, and ancillary facilities, located on the Munster Agricultural Society grounds, at Curraheen (Objective RCI 5-7).

Having regard to the nature and extent of a showground use, to the established nature of this use at the site, and to limitations applicable to the future development of the site to this use, it is considered that the development of a multi-purpose sports, exhibition and education facility at this location would constitute an incompatible use within the greenbelt, would significantly intensify non-showground and commercial operations in this greenbelt, would contribute substantially to the erosion of the greenbelt, and would constitute an undesirable precedent for development of this nature in the immediate vicinity. Furthermore, it is considered that the proposed development would undermine the viability and development of events centres within established serviced urban areas in the wider area, where there is a defined catchment, where public transport and provisions for other road users are established, and where the availability of public infrastructure and support facilities to service such development exist. The proposed development would, therefore, be contrary to the objectives of Cork County Development, would undermine the orderly development of such facilities in Cork City and its environs, and would, thus, be contrary to the proper planning and sustainable development of the area.

2. The proposed development would access a local road network that is limited in alignment and restricted in width and which is in close proximity to the heavily trafficked N40 National Primary Road and its associated interchanges in the vicinity of the site. It is an objective of Cork County Development Plan to prevent the undermining of the strategic transport function of national roads and to protect the capacity of interchanges from locally generated traffic. Furthermore, it is a provision of the *Spatial Planning and National Roads Guidelines for Planning Authorities 2012* that planning authorities are required to exercise particular care in their assessment of development at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

It is considered that the siting of the proposed multi-purpose facility would substantially add to the volumes of traffic accessing the inadequate local road network at this location, would significantly increase the traffic turning movements at heavily trafficked junctions in this section of the road network in the immediate vicinity of the N40 National Primary Road, would adversely affect the carrying capacity and safety profile of the local road network, and would adversely affect the capacity and efficiency of the nearby N40 interchanges. The proposed development would, therefore, constitute a significant traffic hazard, would conflict with the Development Plan objectives and the requirements of the National Roads Guidelines, and would, thereby, be contrary to the proper planning and sustainable development of the area.

3. Having regard to the range of uses proposed for the multi-purpose facility, the likely increased number of events at this rural location and the periods over which such events would take place, the traffic that would be generated on more a regular basis on an inadequate local road network, and the inconvenience that would arise for the residents in the vicinity of the site, it is considered that the proposed development would be out of character with the pattern of development in this rural area, would have significant adverse impacts on the amenities of residents of the area by way of noise, nuisance, general disturbance, light intrusion, etc., and would, therefore, be contrary to the proper planning and sustainable development of the area.

Kevin Moore
Senior Planning Inspector

21st April 2020