

The Secretary An Bord Pleanála 64 Marlborough Street Dublin 1 27 June 2019

Re: Strategic Housing Development Application to An Bord Pleanála

Application for 483 no. residential units (258 no. houses, 213 no. apartment units, 6 no. owndoor apartments and 6 no. duplex units), a childcare facility of 677 sqm, a new vehicular access point and associated site works on lands at Blackrock Road, Haggardstown, Blackrock, Dundalk, Co. Louth.

ABP Reference: 303256-18

Dear Sir/Madam,

This application is made on behalf of Kingsbridge Consultancy Limited to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 13 February 2019.

This correspondence identifies the following documentation and information submitted with this application:

- 1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001 to 2017, as amended; and,
- The information is made pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 13 February 2019, as required under article 297(3) of the Planning and Development Regulations 2001 to 2017, as amended.

1. ARTICLE 297 AND 298 REQUIREMENTS

The documentation required under article 297 is identified below:

• 297(1) – The planning application form is submitted herewith

- 297(2)(a) A letter of consent from Louth County Council in respect of works at the Blackrock Road, and a letter of consent from Mr. Coyle in respect of works at the entrance to the site.
- 297(2)(b) A copy of the newspaper Notice published in the Irish Daily Star on 26th June 2019 is attached herewith.
- 297(2)(c) OMP Drawing No. 1806-OMP-00-ZZ-DR-A-XX-10001, Site Location Map, at a scale of 1:1000 and incorporating the requirements of parts (i) to (iv) is submitted herewith.
- 297(2)(d) Evidence from Irish Water that it is feasible to provide services is illustrated in the Statement of Design Acceptance submitted herewith, and in the engineering & Services Report, prepared by Finn Design Partnership, as Appendixes L and M.
- 297(2)(e) It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- 297(2)(f) A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- 297(2)(g) Details of compliance with Section 96 of the Planning and Development Act 2000 have been detailed in Section 3.4 of the Planning & Statement of Consistency Report submitted with the application. Details of Part V compliance including the location of units, layouts, calculations and methodology for calculating costs form the basis of ongoing consultation with the Housing Department and a letter from the Housing Section submitted herewith and is included in Appendix A of the Planning Report.
- 297(2)(h) Units to be transferred to the Planning Authority have been identified on Drawing No. 1806-OMP-00-ZZ-DR-A-XX-10003, Proposed Masterplan, submitted herewith.
- 297(2)(i) Letter of consent from Louth County Council in respect of works at the Blackrock Road, as shown in the drawings accompanying that letter, and a letter of consent from Mr. Jim Coyle regarding lands at the site entrance.
- 297(2)(j) The appropriate statutory fee of €80,000, being the fee payable, is attached herewith.
- 297(3) Section 2 below provides a statement of proposals to address the matters set out in the Board's Notice of Pre-Application Consultation Opinion dated 13th February 2019.
- 297(4) and 298(1) A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- 298(2) This application does not propose any works to a Protected Structure or Proposed Protected Structure or to the exterior of a structure within an Architectural Conservation Area.

It is noted that the application is accompanied by Natura Impact Statement and an Environmental Impact Assessment Report (EIAR). Results of the archaeological assessments undertaken at the site form part of the EIAR submitted herewith.

2. STATEMENT OF PROPOSALS TO ADDRESS ISSUES RAISED IN THE BOARD'S NOTICE OF PRE-APPLICATION CONSULTATION OPINION

The Board's Opinion of 13 February 2019 identified the following:

1. Issues to be addressed in the documents submitted with the application. The Board's Notice stated that the documents submitted require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development, and identified those matters in its Notice. These issues have been comprehensively addressed in the drawings, documents and reports submitted with the application. Section 3 below provides a statement of the manner in which these matters have been addressed in the documentation submitted.

2. Specific Additional Information to be submitted with the Application. The documentation submitted with this application is listed in Section 1 above and on the separate Schedule of Documents. This information includes all of the specific items identified in the Opinion.

3. Authorities to be notified of the making of the application. Copies of the letters sent to these authorities notifying them of the application under section 8(1)(b) of the Act are submitted with this application.

3. THE BOARD'S OPINION – ISSUES ADDRESSED IN THE SUBMITTED DOCUMENTATION

The Board's Opinion identifies matters to be addressed in the documents submitted with the application. These matters have been addressed in the documents submitted herewith. To assist the Board and any interested parties in assessing the application the following sections provide a summary of the proposed amendments addressing the matters raised in the Board's Opinion, a summary of the manner in which the matters have been addressed in detail and incorporated into the drawings and documents submitted, and where the issues have been addressed in detail.

3.1 Timing and Phasing of Development

Item 1 states:

'Further consideration and/or justification of the documents as they relate to the development of Phase II residential lands as set out in the Dundalk Environs development plan and the possible prematurity of development at this location pending the completion of the review of this plan. Where it is proposed to develop the subject lands prior to the adoption of the new development plan a planning rationale/justification for the release of these Phase II residential lands should be submitted which has due regard to all Phase 1 residential lands which remain undeveloped and the provisions of the County Development Plan 2015-2021. The duration of the permission sought should also be considered in this context.

'An appropriate statement in relation to section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended by Section 53 of the Act of 2018, that outlines consistency with the relevant development plan and that specifically address any matter that maybe considered to materially contravene the said plan should be provided. The further consideration of this issues may require an amendment to the documents and/or design proposals submitted'.

The submitted Planning Report & Statement of Consistency, and the Material Contravention Statement, provide a focused justification for the release of the subject lands for development. Given the strategic context of the site and its capacity to make a significant contribution to addressing the housing supply shortage in Dundalk, the duration of the permission sought is 5 years.

Sections 6.1 and 6.2 of the Planning Report & Statement of Consistency set out the relevant policies and objectives of the Louth County Development Plan 2015-2021 and the Dundalk and Environs Development Plan 2009-2015, respectively. Section 2.16.4 of the County Plan states that "*The Louth County Development Plan 2015-2021 will be an over-arching Development Plan for the entire county including Dundalk and Drogheda*", and that the Dundalk and Environs Development Plan 2009-2015 will be replaced by a Local Area Plan that is consistent with County Plan. There is no timeline in place for drafting the proposed LAP for Dundalk, or the UAP as provided for in the RSES, and for the detailed reasons set out in the Statement of material Contravention, it is submitted that to stall the planning application process for housing in Dundalk for an unidentified period would exacerbate existing housing shortages in the area and is contrary to regional and national policy. This application is for a residential scheme on zoned serviced lands contiguous to the established urban area and proximate and accessible to employment, educational and commercial areas. The lands are appropriately considered to be Tier 1 serviced lands.

The assessments presented in the submitted Reports clearly establish that the Dundalk Development Plan, dating from 2009, is no longer fit for purpose with regard to the delivery of housing, and has constrained the release of residential land in Dundalk, a designated Key Town in the NPF. The lands are zoned for residential development and perform well against the criteria for the zoning of residential land, being Tier 1 land presenting an opportunity for consolidation of the urban area between the Dundalk Central area and Blackrock, and proximate and accessible to services and amenities by sustainable modes. The reason for the Phase 3 status of the lands was services constraints that have now been removed as evidenced by the Irish Water PCE Response. Accordingly, the development of the lands cannot be considered to be premature some 10 years after the adoption of the Development Plan, and having regard to the national and regional policy context which support the ongoing and future growth and consolidation of Dundalk as a major employment and population centre.

With regard to the delivery of development on Phase 1 lands, it is submitted that just 10 no. dwellings have been fully constructed and occupied on the Phase 1 lands since their prioritisation in 2011. This single planning permission for 67 no. detached and semi-detached houses (Reg. Ref. 1420049) is due to expire in December 2019 and construction has not commenced for the remaining 57 no. units. No other planning permissions have been granted on the Phase 1 residential lands since their designation in 2011 and therefore, of the 1,750 no. units allocated to the Phase 1 residential lands under the Dundalk & Environs Development Plan 2009-2015 a total of 1,740 remain undeveloped.

The review of the planning history of the Phase 1 residential lands reveals that development is constrained by road infrastructural issues. A refusal for planning permission for 139 no. units on the lands cites potential traffic hazard on the Mount Avenue Road (Reg. Ref. 14/378 ABP Ref. PL15.244460) and most recently permission sought for 80 no. units on roughly the same site includes extensive road upgrades to the Mount Avenue Road and the junction with Headford road (Reg. Ref. 18/943 ABP Ref. 303628-19). See Appendix A attached for a map of these application sites.

It is noted that LIHAF funding has been awarded to upgrade c. 2 kilometres of the Mount Avenue road to facilitate the development of 212 no. units up to 2021, and 1,200 overall. Information submitted to the Board

from Louth Council in respect of Reg. Ref. 18/943 ABP Ref. 303628-19 indicates that residential schemes for 200 no. units are in advanced stages of design and that these units will secure the LIHALF allocated funds. While the Planning Authority is pro-active in facilitating the release of the Phase 1 residential lands, these developments will not deliver residential units in the quantity allocated in the Development Plans, particularly in the short term.

The documentation submitted herewith has addressed the proposed material contravention of the Phasing Plan of the Dundalk and Environs Development Plan 2009-2015, and the above matters, in detail.

3.2 Surface Water Management and Risk of Flooding

Item 2 states:

'Further consideration of documents as they relate to surface and storm water management for the development lands and the risk of displaced or increased discharge of waters downstream to the Dundalk Bay SAC, including the risk of flooding to the site entrances. This further consideration should be considered within the Environmental Impact Assessment report. Regard should be given to the requirements of the Local Authority in respect of surface water treatment and disposal and SUDS measures proposed for the scheme. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management Guidelines' (including the associated 'Technical Appendices') and include hydraulic modelling where considered appropriate. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted'

Section 3 of the 'Surface Water Drainage' of the Engineering & Services Report prepared by Finn Design Partnership contains a detailed description and assessment of the proposed surface and storm water infrastructure. It states that the surface water management for the proposed development is designed to comply with the Greater Dublin Strategic Drainage Study (GDSDS) policies and guidelines and the requirements of Louth County Council. It is proposed to use a sustainable urban drainage system (SuDS) approach for the stormwater management and the following SuDS features are incorporated into the scheme; filter strips, swales (wet), swales (dry), filter drains, permeable paving, bioretention areas, attenuation/infiltration basin, petrol interceptors. Utilising these features, this system comprising 4 no. networks has been designed to mimic existing runoff from the subject site as calculated using the QBAR equation for small rural catchments. The allowable 'greenfield' run-off rates are achieved at the site through the attenuation of water and the use of hydrobrakes to limit outfall from the network. The attenuated greenfield run-off from the majority of the development (Part A) will discharge to an existing open channel to the north east of the site where a new culvert is proposed that incorporates flow control measures including the retention of water and a riprap apron. The attenuated run-off from the main entrance road (Part B) will be retained in oversized pipes before discharging to existing wetlands to the north of the site at allowable greenfield rates.

The impact of the proposed surface and stormwater infrastructure and resulting discharges on the receiving waters and adjoining properties has been assessed within the hydraulic modelling undertaken by IE Consulting. The results of the hydraulic modelling are included in Appendix E of the Flood Risk Assessment, submitted herewith. This assessment found that in the worst case scenario the maximum discharge rate from network 3 at the northeast of the site has the potential to increase the increase 1 in 100 year (1% AEP) and 1 in 1000 year (0.1% AEP) flood levels to between 0.03m (30mm) and 0.04m (40mm) within a short length

downstream of the head wall location. These small predictive increases in flood levels within this channel are imperceptible and immeasurable and would not result in an adverse impact to the existing hydrological regime or result in an increased flood risk to adjacent lands or properties. The proposed attenuated water from the proposed access road is not predicted to result in any measurable increase in current scenario fluvial flood levels and will not have any adverse impact on the existing hydrological regime in the area or result in an increased flood risk elsewhere.

The Flood Risk Assessment submitted in support of this application was prepared in full compliance with the requirements of "The Planning System & Flood Risk Management Guidelines" published by the Department of the Environment in November 2009. This assessment identified that the eastern portion of the site at the main vehicular entrance is susceptible to coastal flooding and is deemed to be in a Flood Zone A. It is therefore proposed to raise the vertical alignment of a 158 metre section of the Blackrock Road (R172) by an average to 395 mm to ensure that vehicles may use this roadway in a southerly direction during 1 in 10 yr (10% AEP), 1 in 200 yr (1% AEP) and 1 in 1000 yr (0.1%) coastal flooding events. Where the public road is to be raised the existing footpaths will also be replaced and this will ensure that there is pedestrian access to and from the development during extreme coastal weather events.

The EIAR prepared by Atkins seeks to identify and assess the impacts of the proposed development on the Environment and has been prepared in accordance with the Planning and Development Regulations 2001, as amended, and with due regard to the EIAR guidance prepared by the Environmental Protection Agency comprising; 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports – Draft' published in 2017; 'Revised Guidelines on the Information to be contained in Environmental Impact Statements' published in 2015; and, 'Advice Notes on Current Practice (in the Preparation of Environmental Impact Statements)' published in 2015, and the 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' published by the Department of Housing, Planning and Local Government in August 2018. The proposed surface and storm water management infrastructure at the site and the findings of the Flood Risk Assessment and hydraulic modelling were considered as part of this environmental assessment, specifically in Chapter 3 'Population and Human Health' and Chapter 10 'Water'. It is noted in Section 10.3.4 of the EIAR that the proposed stormwater system has been designed to prevent fuel or oil contaminants from entering the hydrological environment through the provision of silt traps and oil separators in each of the 4 no. storm water networks and the use of emergency penstock valves at the storm water basin to prevent the outflow of contaminated water. Section 10.5 of the EIAR states:

"The proposed development will have an imperceptible impact on existing surface water flows in the vicinity of the Site, and to groundwater resources either onsite or offsite. The proposed development will have an imperceptible impact to water levels within the existing downgradient wetlands areas. Therefore, this development will have an imperceptible impact to existing flows currently discharging to Dundalk Bay SAC/ SPA. No groundwater or surface water impacts are expected as a result of current or historic land-use either at the Site or within adjacent lands. The proposed development will not result in flooding in the immediate vicinity or wider area, and does not pose an unacceptable onsite flooding risk".

4. SPECIFIC INFORMATION TO BE SUBMITTED WITH APPLICATION

The Board's Opinion detailed specific information to be submitted with any application. The Table below details the information requested and where the information can be located:

	Specific Information	Locations
1	In the context of ancillary or associated enabling infrastructure (roads and carparking) being located on lands zoned 'Recreation, Amenity and Open Space' and thereby reducing the quantum of open space, a design rationale/planning justification in respect of the open space provision, and built/urban edge surrounding it should be submitted.	The proposed site layout has been amended to remove c. 130 no. residential car parking spaces that had previously been located on the zoned open space. This has been achieved by realigning internal roads and providing underground car parking for Blocks A/B and F and has resulted in the reduction of the scheme from 485 no. to 483 no. units.
		extent. Section 6.2.3.1 of the Planning Report &
		Statement of Consistency provides a planning justification for the remaining roads and creche parking on the zoned open space. The Urban Design & Architectural Statement of Consistency states that the proposed apartment buildings at the edges of the open space frame the views along the park and through the development and offer supervision across this large central area. Providing higher buildings in this central location allows proposed building heights to taper towards the edges to the scheme to interact appropriately with the existing dwellings.
2	An Environmental Impact Assessment Report	Prepared by Atkins and submitted herewith.
3	A layout plan with the zoning objectives overlain on the proposed residential scheme to provide clarity regarding location of residential units and road infrastructure including parking vis-ávis the lands zoned open space.	Drawing no. 1806-OMP-00-ZZ-DR-A-XX-10008 'Proposed Site Layout Plan + Zoning Map' has been prepared by OMP and submitted herewith.
4	Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with contiguous land-uses. Proposed boundary treatments should be specified.	 Photomontages have been prepared by Digital Dimension from locations agreed with the Planning Authority prior to submission. OMP have prepared 8 no. cross sections across the site boundaries that show how the development will interface with contiguous land uses. Please refer to Drawing No. 1806-OMP-00-

		 ZZ-DR-A-XX-30003 'Proposed Site Sections 1-1, 2-2, 3-3, 4-4, 5-5, 6-6 & 7-7' and Drawing No. 1806-OMP-00-ZZ-DR-A-XX-30004 'Proposed Site Sections 8-8, 9-9 & 10-10'. Sections 3, 4, 5 and 6 are across potential future connections to residential zoned lands. Proposed boundary treatments are shown in Drawing No. 18.130.400 'Boundary Details' and Drawing No. 18.130.401 'Boundary Sections' prepared by Mullin Design Associates.
5	Details of existing and proposed levels across the development site relative to adjoining lands in particular contiguous residential properties and where connections to adjoining lands are proposed Full details of any changes in levels proposed should be provided.	As above, 8 no. cross sections have been prepared by OMP that show how the development will interface with contiguous lands and at proposed connections to residential zoned lands. Please refer to Drawing No. 1806- OMP-00-ZZ-DR-A-XX-30003 'Proposed Site Sections 1-1, 2-2, 3-3, 4-4, 5-5, 6-6 & 7-7' and Drawing No. 1806-OMP-00-ZZ-DR-A-XX-30004 'Proposed Site Sections 8-8, 9-9 & 10-10'.
		These sections contain site levels and details of proposed and existing structures, and illustrate that future connects are feasible to the existing zoned residential lands.
6	Having regard to the local road network serving the site and adjoining lands, and its ability to accommodate additional traffic and/or accesses, the prospective application should demonstrate the suitability of the proposed vehicular access arrangements for the subject site and to consider or address any issues in respect of access to adjoining lands, in particular ensuring that the proposed development subject of this SHD pre- app does not unduly prejudice the future development of adjoining zoned lands.	A Traffic and Transport Assessment has been prepared by Atkins and is submitted herewith. Section 7 of the TTA assesses the proposed development access junction to accommodate traffic arising from the proposed scheme and potential future development from the zoned residential lands to the south.
7	A site layout plan which clearly identifies the full extent of works to the proposed entrances and road junctions in public or private ownership. Relevant consents to carry out works on lands that are not included within the red-line boundary. The prospective applicant is advised that all works should as far as possible be included within the red-line boundary.	Drawing No. 1703-ENG-003 'Proposed Works on Third Party Lands' and Drawing No. 1703-END- 004 'Proposed Works on Lands within Louth Co Council Charge' have been prepared by Finn Design Partnership and show the details of the proposed works on lands outside of the applicant's control. These works relate to the proposed entrance junction onto the Blackrock

		Road and part of the proposed surface water infrastructure. The areas shown in green are under the control of Louth County Council and a letter of consent is submitted herewith. The areas shown in pink are under the control of MR. Jim Coyle and a letter of consent submitted herewith.
8	All existing watercourses and utilities that may traverse the site including any proposal to culvert/re-route/underground existing drains/utilities should be clearly identified on a site layout plan.	Drawing No. 1703-ENF-151 'Existing Watercourses & Utilities Layout Plan' prepared by Finn Design Partnership the details of existing drains, utilities and watercourses at and adjoining the subject site.
9	A Building Life Cycle Report in respect of the proposed apartments as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018).	Aramark have prepared a Building Life Cycle Report that is submitted herewith.
10	A construction and demolition waste management plan.	An Outline Construction Environmental Management Plan and an Outline Construction & Demolition Waste Management Plan have been prepared by Atkins and is submitted herewith.
11	A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals having regard to sub- catchments within the scheme and Part V provision.	A phasing plan has been prepared by Finn Design Partnership, please see Drawing No. 1703-ENG-150 'Phasing Plan' submitted herewith.
12	A site layout plan indicating all areas to be taken in charge.	OMP have prepared a plan indicating all areas to be taken in charge, please see Drawing No. 1806- OMP-00-ZZ-DR-A-XX-10007 'Site plan – Taking in Charge'.

As requested, the following authorities have been notified of this current application;

- 1. Irish Water
- 2. Transport Infrastructure Ireland
- 3. Minister for Culture, Heritage, and the Gaeltacht
- 4. Heritage Council
- 5. An Taisce the National trust for Ireland
- 6. Louth County Childcare Committee

I trust that the application documentation is in order and I look forward to a favourable decision from the Board.

Yours faithfully,

Declan Brassil Declan Brassil & Co.

APPENDIX A

REVIEW OF PHASE 1 RESIDENTIAL LANDS



Figure 1. Excerpt From Dundalk& Environs Development Plan 2009 Core Strategy Phasing Map with Relevant Application Subject Sites Shown in Black.

Reference	Status (as of April	No. of Units	No. Units
	2019)	Permitted	Development
Reg. Ref. 14520049	Granted: 8 Dec. 2014	64	10
	Expires: 7 Dec. 2019		
Reg. Ref. 14378, ABP Ref. PL15 .244460	Refused: 18 June 2015	-	-
Reg. Ref. 18943, ABP Ref. PL15 .303628	Undecided	-	-
Phase 1 Residential: Housing Allocation Dev. Plan 2009-2015		1,750 no. Units	5
Phase 1 Residential: Undeveloped Units	1,740 no. Units		

APPENDIX B

EXCERPT FROM STATEMENT OF DESIGN ACCEPTANCE

Tony Finn, Finn Design Partnership, Blakestown, Ardee, Co. Louth

20 May 2019

Re: Design Submission for Strategic Housing Development at Haggardstown, Blackrock, Dundalk, Co. Louth (the "Development") (the "Design Submission") / 1604905118.

Dear Tony,

Many thanks for your recent Design Submission.

We have reviewed your proposal for the connection(s) at the Development. Based on the information provided, which included the documents outlined in Appendix A to this letter, Irish Water has no objection to your proposals.

This letter does not constitute an offer, in whole or in part, to provide a connection to any Irish Water infrastructure. Before you can connect to our network you must sign a connection agreement with Irish Water. This can be applied for by completing the connection application form at <u>www.water.ie/connections</u>. Irish Water's current charges for water and wastewater connections are set out in the Water Charges Plan as approved by the Commission for Regulation of Utilities (CRU) (<u>https://www.cru.ie/document_group/irish-</u> <u>waters-water-charges-plan-2018/</u>).

You the Customer (including any designers/contractors or other related parties appointed by you) is entirely responsible for the design and construction of all water and/or wastewater infrastructure within the Development which is necessary to facilitate connection(s) from the boundary of the Development to Irish Water's network(s) (the "Self-Lay Works"), as reflected in your Design Submission. Acceptance of the Design Submission by Irish Water does not, in any way, render Irish Water liable for any elements of the design and/or construction of the Self-Lay Works.

If you have any further questions, please contact your Irish Water Representative

Name:	Marina Byrne
Phone:	01 8925991
Email:	mzbyrne@water.ie

Yours sincerely,

M Buyer

Maria O'Dwyer

Connections and Developer Services

Stiärthéirí / Directors: Mike Quinn (Chairman), Eamon Gallen, Cathal Marley, Brendan Murphy, Michael G. O'Sullivan Offig Chláraithe / Registered Office: Teach Cokill, 24-26 Sráid Thaltóid, Bale Áéha Clach 1, D01 NP86 / Cokill House, 24-26 Talbot Street, Dubin 1, D01 NP86 Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Usec Éireann / Irish Water is a designated activity company, limited by shares. Uimhir Chláraithe in Éirinn / Registered in Ireland Noc 530563

REV007

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

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