

Development Plan Submission,
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork
T12 T007

Monday, 4th October 2021
[By Online submission]

-: CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028:-

Dear Sir/Madam,

RE: SUBMISSION TO THE CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028 IN RESPECT OF LANDS AT ST. ANN'S ROAD, MONACNAPA, BLARNEY, CORK

LIDL IRELAND GMBH – Site Specific Zoning Submission regarding three key issues:

1. Remove the designation for *Proposed ACA* as the subject lands are brownfield with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve.
2. Remove the proposed *ZO 02 New Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 01 Sustainable Residential Neighbourhoods* zoning, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre.
3. To provide for specific convenience use(s) with a Net Retail Sales Area of 2,000 sq m or less, be facilitated on the subject lands at St. Ann's Road, Monacnapa, Blarney, Cork, represent more of a 'local shopping' function.

1.0 INTRODUCTION

The Planning Partnership, The Coach House, Dundanion, Blackrock Road, Cork City, are instructed by **Lidl Ireland GmbH**, Head Office, Main Road, Tallaght, Dublin 24, to prepare this *Site Specific Submission* in relation to the ongoing Cork City Development Plan Review process and the publication of the subsequent *Cork City Draft Development Plan 2022-2028*.

1.1 Focus of the Submission

The purpose of this submission is to seek the:

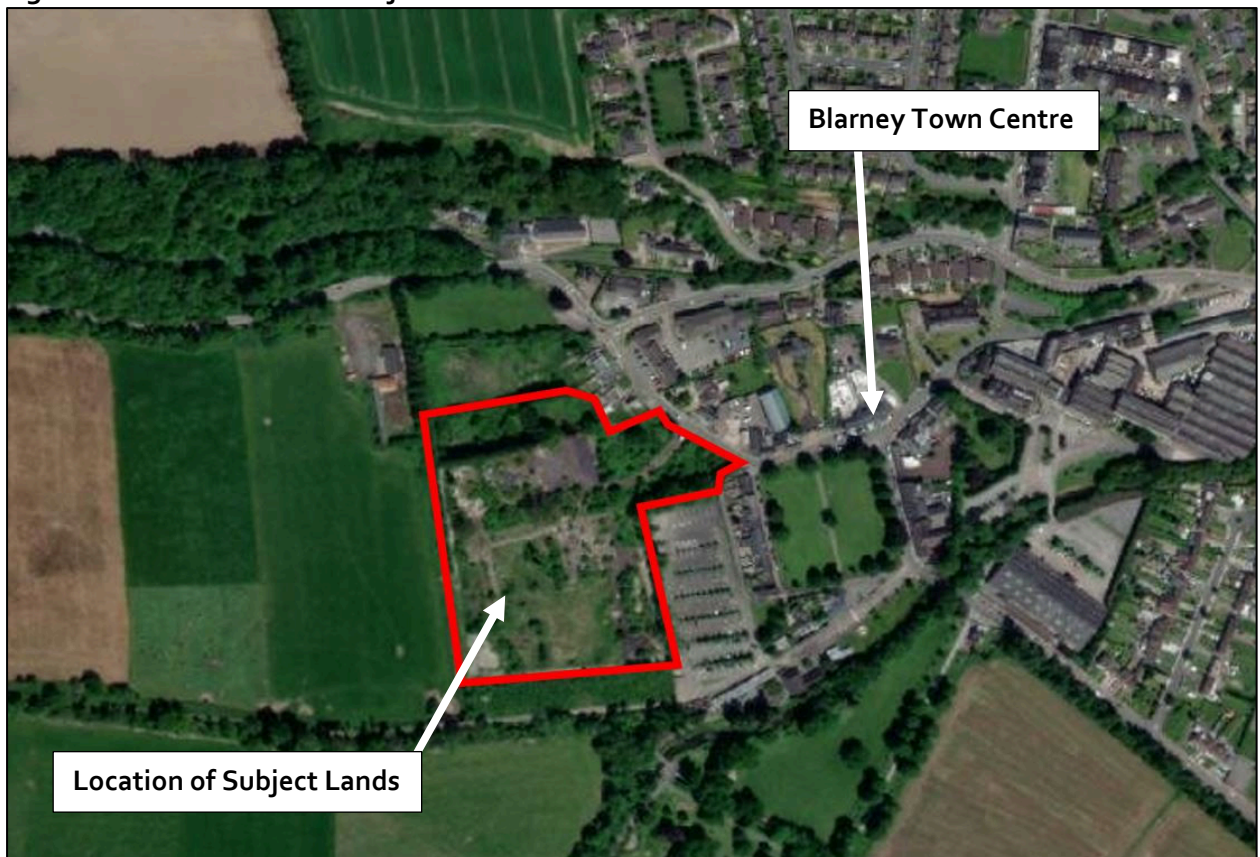
1. Removal of the designation for *Proposed ACA* as the subject lands are brownfield with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve.

2. Removal of the proposed *ZO 02 New Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 01 Sustainable Residential Neighbourhoods* zoning, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre.
3. To provide for specific convenience use(s) with a Net Retail Sales Area of 2,000 sq m or less, to be facilitated on the subject lands at St. Ann's Road, Monacnapa, Blarney, Co. Cork, as such convenience store represent more of a 'local shopping' function, with a greater proportion of shoppers using alternative modes of transport (by foot or by public transport) to the private car, representing a more 'sustainable shopping pattern and experience' than mainstream supermarkets.

And that such be reflected/presented within the new *Cork City Development Plan 2022 – 2028*.

The location and extent of the subject lands, which are currently subject to First Party Appeal by Lidl Ireland GmbH for a Mixed-use Development under An Bord Pleanála Plan. Reg. Ref. No.: ABP-309152-21, are identified within **Figure 1.1** below.

Figure 1.1: Location of the Subject Lands



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, October 2021

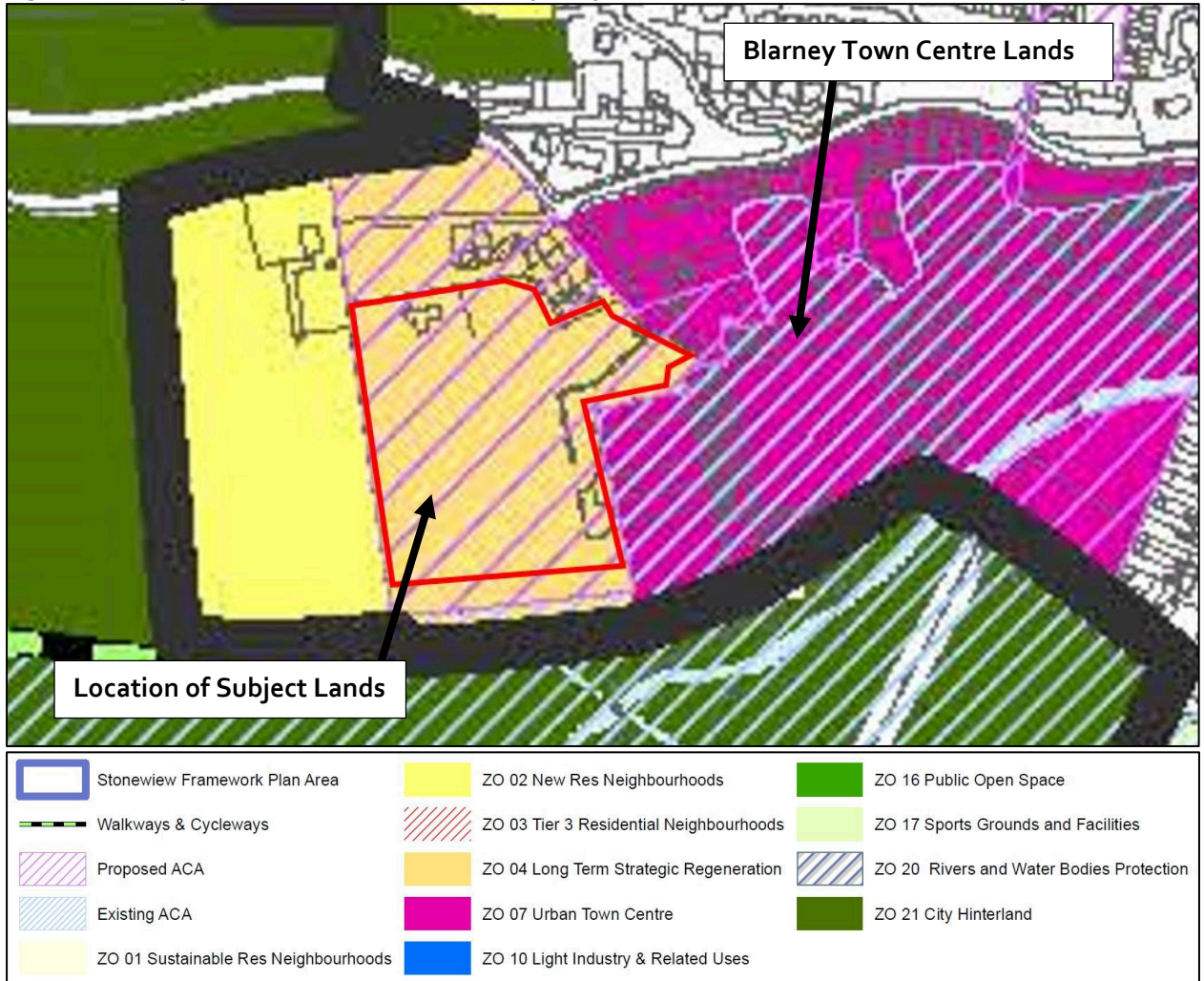
The *ZO 01 Sustainable Residential Neighbourhoods* include for acceptable uses in principle, specifically referencing that a local convenience shop is acceptable. However no further details are provided in terms of what constitutes, or defines, a local convenience shop.

Subject to the key retail tests in terms of the *Retail Planning Guidelines* (2012), the location of new Foodstores should be promoted to complement the fulfilment of the local shopping function.

In terms of the *Retail Planning Guidelines (2012)*, new convenience space should be accommodated in areas where such need can be demonstrated through the key retail tests:

- Justifying Need;
- Impact;
- Sequential Test; and
- Ensuring that the development is of an Appropriate Scale (that such additional space can be accommodated).

Figure 1.2: Subject Lands within the Cork City Draft Development Plan 2022 – 2028



Source: *Cork City Draft Development Plan 2022 – 2028*, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

2.0 NATIONAL AND LOCAL PLANNING CONTEXT

The following relevant extracts from national and local policy supports the current submission.

National Planning Framework – Project Ireland

***NPO 4:** Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

NPO 5: *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

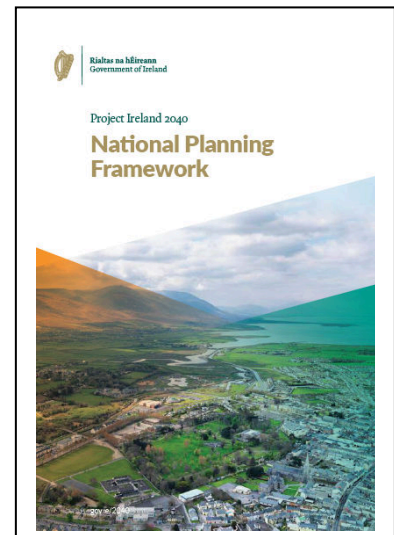
NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

NPO 15: *Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

NPO 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

NPO 27: *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.*

NPO 28: *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*



Regional Spatial Economic Strategy for the Southern Region

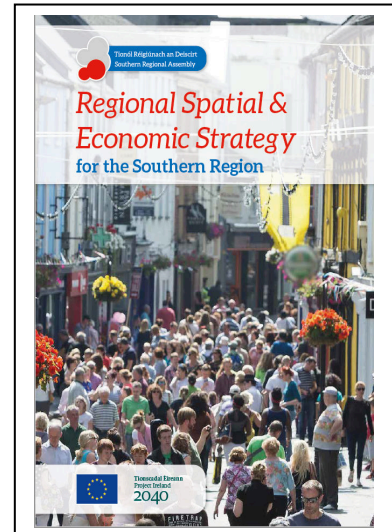
PO 2 Planning for Diverse Areas:

The RSES recognises the strategic role played by all areas, both urban and rural, in achieving the set regional and national targets and objectives. The RSES supports sustainable enterprise growth, services, physical and social infrastructure investment and the sustainable growth of all communities in the Region. The overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage.

RPO 10 Compact Growth in Metropolitan Areas:

To achieve compact growth, the RSES seeks to:

- a. *Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*
- b. *Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP. Such strategic initiatives shall comply with MASP Goals to evolve innovative approaches for all MASPs. Initiatives may include:*
 - *Support the creation and role of Active Land Management Units with a remit to focus on the metropolitan areas and compact growth targets;*
 - *Partnerships with the Land Development Agency to progress housing and employment delivery in city and town centres, focusing on co-ordinating and developing large, strategically located, publicly owned land banks, reducing vacancy and increasing regeneration of key sites;*
 - *Support the role of the local authority as a development agency to kick start regeneration processes;*
 - *Seek design competitions for key strategic sites that deliver greater density, mixed uses where appropriate, sustainable design, smart technology, green infrastructure and public gain through good design;*
 - *The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas; and*
 - *Creation of continually updated databases identifying brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets. Through active land management initiatives, identify strategic locations for residential growth responding to the growth targets and achievement of compact growth and employment growth.*

**RPO 55 Retail:**

It is an objective to:

- a. *Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration / public realm projects and other measures;*
- b. *Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;*
- c. *Prepare Retail Strategies in accordance with the Retail Planning Guidelines including Joint Retail Strategies where applicable. Proposed public realm or urban regeneration projects should be assessed for potential impacts on the receiving environment including capacity of existing services at project level.*

Where public realm or urban regeneration projects would significantly increase shopper/visitor numbers, planning authorities should ensure that projects include sustainable management of increased demand for access to city/town centre locations.

RPO 62 Location for Employment Development:

It is an objective to:

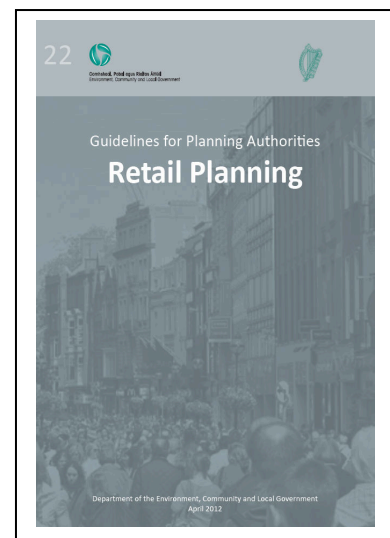
b- Identify future locations for strategic employment development having regard to accessibility by sustainable transport modes and environmental constraints.

Retail Planning Guidelines (2012)

2.5.3 Competitiveness in the Retail Sector:

Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.



2.5.4 Encouraging Sustainable Travel:

While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.

2.5.5 Retail Development and Urban Design:

Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.

Planning authorities should promote quality design in retailing in their development plan and/or retail strategies and then implement this through the development management process. This is of particular importance for retail development because of the dominant visual and use role it plays in a city, town or village streetscape.

3.3 Development Plans and Retailing:

The function of the development plan is to establish an overall strategy for the proper planning and sustainable development of its area.

Specifically in relation to retailing, the development plan must be:

- *Evidence-based through supporting analysis and data to guide decision making;*
- *Consistent with the approach of these guidelines; and*
- *Clear and concise with regard to specific objectives and requirements.*

*5- Set out **strategic guidance** on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites which are suitable and available and which match the future retailing needs of the area;*

***7 -Mobility management measures--** that both improve accessibility of retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and vibrant street life.*

4.4 Sequential Approach to the Location of Retail Development:

City and Town Centres:

The centres of cities and towns are the most suitable locations for the higher order fashion and comparison goods and are the most accessible locations for the majority of the catchment population. They should be supported in maintaining and expanding their retail offer to serve that population in a sustainable way which will also help to reduce the need to travel.

4.9 Retail Impact Assessment:

*However, where a planning authority considers an application for planning permission to develop a new retail development to be particularly large in scale compared to the existing city/town/district centre, or where a retail strategy or development plan has allocated a specific type and quantum of retail floorspace to a particular settlement and a proposed development absorbs on one site the bulk of that potential retail floorspace, the planning authority may request the applicant, by way of a Retail Impact Assessment (RIA) as set out in Annex 5, **to demonstrate compliance with the development plan and that there will not be a material and unacceptable adverse impact on the vitality and viability of any existing centre. This is a matter for careful technical assessment and professional judgement.***

4.11.5 Retailing in Small Towns and Villages:

The role of small towns and villages in the provision of retail services to their local urban and rural populations should be defined in development plans. Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments.

4.11.6 Local Retail Units:

Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.

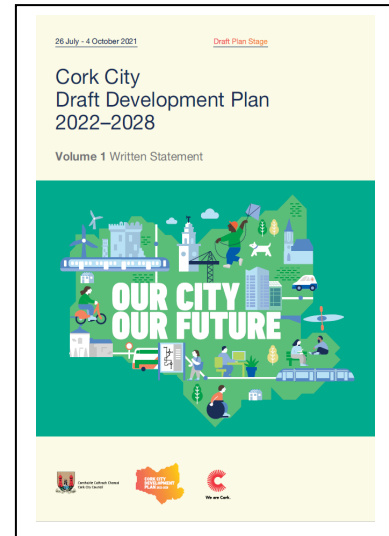
Cork City Draft Development Plan 2022 – 2028

Objective 2.8 The 15-Minute City:

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

Objective 2.10 Mix of uses:

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



7.86 Small Urban Town Centres:

Blarney and Glanmire are Small Urban Town Centres (Level 3 in the Retail Hierarchy). They have a more limited retail role and function than Level 2 District Centres and Large Urban Town Centres. Retail representation in these centres is primarily focused on local convenience and service provision, with a limited comparison offer such as small-scale hardware, retail pharmacies and clothes shops. Given the level of proposed residential growth in Blarney and Glanmire some additional retail development could be directed towards these centres in order to allow them to adequately cater for the needs of their future populations, thereby reinforcing their Small Urban Town status.

7.87 Neighbourhood and Local Centres:

Neighbourhood and local centres are generally anchored by **a small or medium sized convenience store** and tend to include a number of smaller, associated local service units that enhance the overall appeal of the centre in terms of service provision and design. It is essential that they are mixed-use centres incorporating a range of local services. In assessing applications for new centres, the Council will have regard to the proximity of nearby alternative retail facilities and the vitality and viability of these centres, the design quality of the proposed centre and its mix of uses, ensuring that the centre is not overtly dominated by one particular unit or use. This should be demonstrated through the submission of a Retail Impact Assessment.

7.93 Retail Impact Assessment:

Significant retail proposals should be supported by a Retail Impact Assessment, in order to demonstrate compliance with the City Development Plan and that there will be no adverse effect on the vitality and viability of any existing retail centre, including its revitalisation and rejuvenation, and aligns to the principle of achieving compact growth. Retail Impact Assessments shall be in accordance with the requirements as set out in the Retail Planning Guidelines (2012). The requirement to submit a retail impact assessment shall be determined by Cork City Council and may be done so at pre-application consultation stage or in the course of determining the application.

Objective 7.29 Blarney and Glanmire Town Centres:

To support, promote and protect the Urban Town Centres of Blarney and Glanmire, which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. In order to support planned population growth in these centres, some additional retail development of an appropriate scale and size may be directed to these centres.

Objective 7.30 Neighbourhood and Local centres:

To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. It is also aimed to support and facilitate the designation of new Neighbourhood and Local Centres where significant additional population growth is planned or where a demonstrable gap in existing provision is identified, subject to the protection of residential amenities of the surrounding area and that they are adequately served by sustainable transport. Proposals should demonstrate the appropriateness of the site by means of a Sequential Test, demonstrate retail impact and provide for a mix of uses appropriate to the scale of the centre.

Objective 7.34 Assessing New Retail Development:

Cork City Council will have regard to the Retail Planning Guidelines for Planning Authorities (2012) and the accompanying Retail Design Manual in determining planning applications for retail development.

Objective 7.36 Vibrant and Mixed-Use Centres:

- *To encourage a vibrant mix of uses, while retaining a healthy mix of retail uses within the designated centres and ensure they appropriately serve their population catchments.*
- *To invest in and activate the public realm, while promoting accessibility and encouraging sustainable modes of transport as a means to travel to designated centres. This would encourage multi-purpose shopping, business and leisure trips as part of the same journey.*
- *To encourage the development of the Night-time Economy, ensuring that centres are vibrant throughout the day and into the evening providing a variety of leisure and entertainment uses appropriate to their location and context.*

10.249 Retail:

Blarney is defined as a Small Metropolitan Town. There are 43 retail units within Blarney town centre, with a small proportion of comparison units in general indicating that the centre provides a local function, more focused on convenience provision and services. There is no major anchor convenience store within the centre. Given Blarney's proximity to the northern suburbs of Cork City with their offering of large convenience stores it is considered that there is not currently capacity in the town to support a large-scale standalone retailer.

A *Quantitative Retail Assessment* (21st July 2020) which accompanies the Planning Application for a Mixed-use Development which is currently subject to First Party Appeal by Lidl Ireland GmbH under An Bord Pleanála Plan. Reg. Ref. No.: ABP-309152-21, details that a Key objective of the *retail Planning Guidelines 2012* is to secure competitiveness in the retail sector.

As illustrated within the *Quantitative Retail Assessment* (which accompanies this *Planning Statement Report* under separate cover), there is significant retail spend leakage (up to 50%) evident within Blarney and its catchment area in the Base Year (2020). The proposed Licenced Supermarket will provide additional choice and competition to Blarney and its catchment area, thereby contributing to the recapture of a proportion of this retail spend leakage.

The *Quantitative Retail Assessment* confirms that un-catered retail spend equates to a residual floorspace capacity of approximately 658 sq m of convenience retail floorspace and 356 sq m in comparison floorspace which will remain available after the completion of the proposed development.

Projection of Retail Floorspace Requirements in the Design Year

Floorspace	Convenience (sq m)	Comparison (sq m)
Existing and Extant Floorspace	2,436	3,893
Proposed Development	1,147	464
Design Year (2024) Floorspace Requirement	4,240	4,714
Net Retail Floorspace Residual Capacity Available in Catchment Area (after implementation of the proposed development)	658	356

Source: The Planning Partnership July 2020

Having regard to this residual floorspace capacity, it is hereby submitted that **sufficient retail spend will be available within the catchment area to accommodate the proposed development** having regard to un-catered retail spend and the clawback of retail leakage spend by the Design Year (2024), and as such questions/query the Cork City Council's detail presented under **10.249 Retail** of the *Cork City Draft Development Plan 2022 – 2028* claiming that "there is not currently capacity in the town to support a large-scale standalone retailer".

The use of undefined terminology such as a 'large-scale standalone retailer' needs to be defined.

10.250 Retail:

The centre has a higher proportion of leisure and tourism related retail. The importance of tourism to the town indicates that there may be an opportunity for a strong role for independent retail in sustaining the commercial heart and providing a distinct sense of identity for Blarney.

10.266 Walking and Cycling:

Facilitating a modal shift to walking and cycling for local journeys within the town would help ease congestion. There is significant potential for cycle routes in the town given the compact nature of the town and the proximity of most residential areas to the centre.

2.1 Removal of the designation for Proposed ACA as the subject lands are brownfield with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve, is Consistent with the Proper Planning and Sustainable Development of Blarney

According to the statutory based Ministerial issued *Architectural Heritage Protection Guidelines for Planning Authorities 2011*, ACA legislation may be used to protect the following:

- a) groups of structures of distinctiveness or visual richness or historical importance;
- b) the setting and exterior appearance of structures that are of special interest, but the interiors of which do not merit protection;
- c) the setting of a protected structure where this is more extensive than its curtilage;
- d) designed landscapes where these contain groups of structures as in, for example, urban parks, the former demesnes of country houses and groupings of archaeological or industrial remains;
- e) groups of structures which form dispersed but unified entities, but which are not within the attendant grounds of a single dominant protected structure.

The subject lands now proposed to be included within the ACA of Blarney are brownfield in nature with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve.

During review of Volume 3 Built Heritage Objectives of the *Cork City Draft Development Plan 2022 – 2028*, no justification are provided for the inclusion of Irish Conference and Leisure Holdings Limited's brownfield lands within the ACA. The Planning Authority's own assessment details that the focus of the ACA to be "based on the significance and character of Blarney Castle Estate and the original industrial village". The focus as such is:

- The Blarney Castle Estate, character defined by its recreational/tourist attraction status;
- The central green lined with modest houses;
- Church of Ireland, Church of the Resurrection, located on the North side of the central green;
- Terraces of workers housing being developed in association with the expansion of the Mills;
- Blarney Woollen Mills located to the east of the central green;
- Residential buildings associated with the Mills; and
- the former terminus of the Cork and Muskerry Light Rail.

Were it recommend to include the Subject Lands due to the setting of Blarney Castle, its noted that such designation is restricted to the extent of land which is currently subject to a Planning Application under Appeal with An Bord Pleanála under Planning Reference ABP-309152-21 (Cork City Council Planning Reference 20/39597. The proposed ACA designation does not extend to neighbouring lands to the west of the subject lands, or the Northern Residential Suburbs, or the norther surrounding hinterland's elevated lands, all which are in full visual view of Blarney Castle as confirmed by Map o6 of the View Management Framework within *Cork City Draft Development Plan 2022 – 2028*.

The *Architectural Heritage Protection Guidelines for Planning Authorities 2011* details that boundaries of ACA's should make physical, visual and planning-control sense and that it "may be necessary to refer back to the core characteristics of the area in order to establish the most appropriate boundary lines".

We further acknowledge that the choice of boundary may be influenced by considering the importance of the various views into and out of the area, and that it is not necessary to include all territory encompassed by such views. However, it appears that the additional ACA designation is restricted to the land extent subject to a Planning Application under Appeal with An Bord Pleanála under Planning Reference ABP-309152-21 (Cork City Council Planning Reference 20/39597, questioning the motives of the Planning Authority in this regard.

In terms of cultural heritage significance and referencing heritage impact assessment guidance from ICOMOS¹ (The International Council on Monuments and Sites), the castle (Blarney Castle), the manor house and associated gardens and estate lands taken as a whole is of high value as it represents a well-preserved historic landscape, exhibiting considerable coherence, "time-depth" or other critical factors and the buildings contained therein have exceptional qualities in their fabric or historical associations.

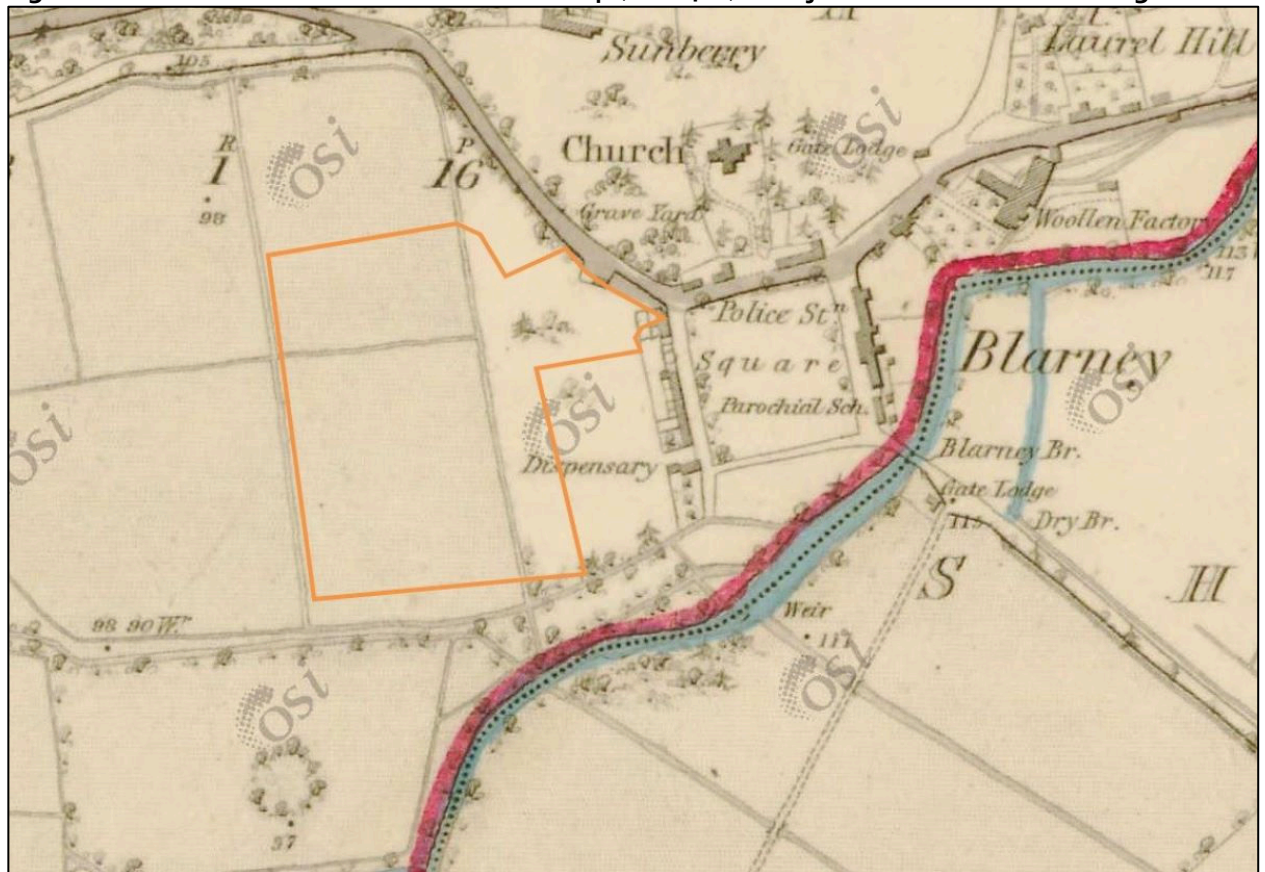
In developing the vacant brownfield subject lands, now proposed to be designated *Proposed ACA*, and applying the same methodology to assess the potential impact of a development proposal on the landscape setting of the estate, it is clear that any such impact will be slight. Development proposals will not give rise to significant change to elements, parcels or components of the estate itself and no change to the amenity or community/tourism value of the estate.

¹ ICOMO (2011) "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties", a publication of the International Council on Monuments and Sites, January 2011

The development of the subject lands will not have any significant negative impacts on built heritage resources within the village of Blarney, or the adjoining Blarney Demesne, and will result in very minor changes to the wider/remote setting of the castle. Therefore, the predicted impact on the setting of the castle will be slight and localised from an architectural heritage perspective.

The first edition Ordnance Survey (OS) map reproduced in Figure 2.2 (below) indicates that the brownfield subject lands, which comprising the former Blarney Park Hotel, were open farmland in the early nineteenth century. This area is level and low-lying.

Figure 2.2: Extract from the first edition OS map (c. 1840s) – subject lands outlined in orange



Source: Ordnance Survey Ireland, extracted and reproduced by The Planning Partnership under OS Licence No. AR0114721

The second edition OS map (produced c.1900) shows that the area occupied by the proposed development site was open fields at the time (see Figure 2.3 below).

The row of flat-roofed bungalows on the eastern perimeter of the site has not yet been constructed. In the wider context, it is interesting to note that the areas to the north of the town and to the west of the Church of Ireland church remained undeveloped at this time. The area to the south of village square has undergone modification with the construction of the railway line, station and associated structures.

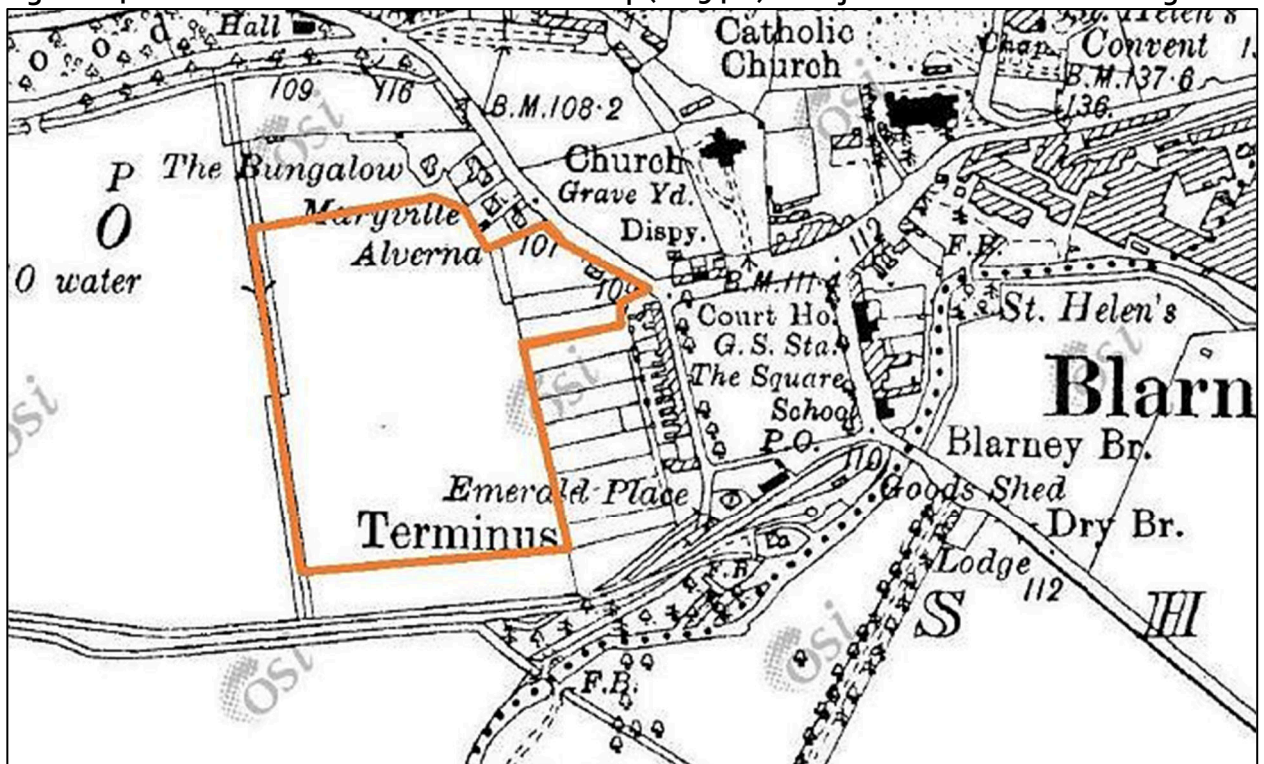
The Cassini map edition (see Figure 2.4 below) shows the site in the 1940s prior to the development of the Blarney Park Hotel. The single-storey house (NIAH Reference 20845001) recorded by the NIAH is shown and named (Alverna) on this map edition. It is one of a group of similar houses built c.1940.

Figure 2.3: Extract from the 1:2500 edition OS map (c. 1900) – subject lands outlined in orange



Source: Ordnance Survey Ireland, extracted and reproduced by The Planning Partnership under OS Licence No. AR0114721

Figure 2.4: Extract from the Cassini edition OS map (c. 1940s) – subject lands outlined in orange



Source: Ordnance Survey Ireland, extracted and reproduced by The Planning Partnership under OS Licence No. AR0114721

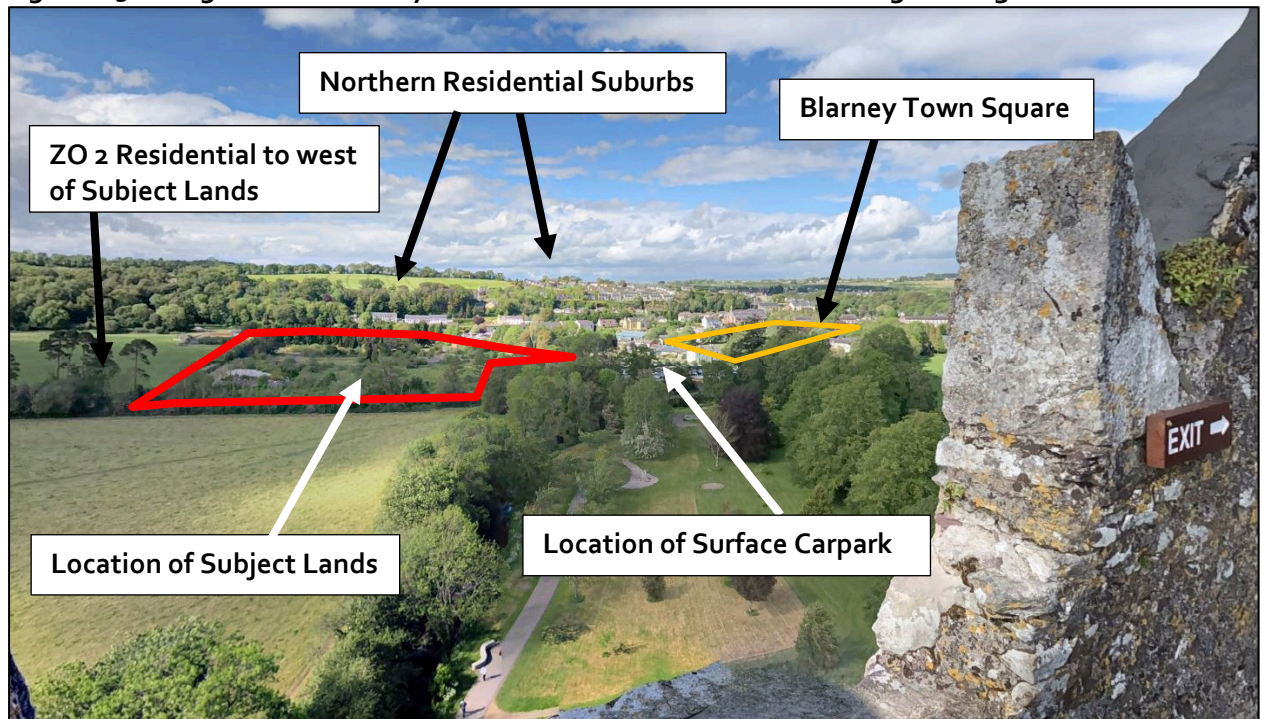
There are no protected structures within or immediately adjacent to the brownfield subject lands. No protected structures will be impacted upon physically should the brownfield subject lands be developed. The built heritage elements that contribute to Blarney’s historic character, namely the

18th- and 19th-century village is centred on the village green, Blarney Castle and Demesne, and the extensive nineteenth-century industrial complex which constitutes Blarney Woollen Mills will also not be directly affected should the brownfield subject lands be developed.

In terms of indirect impacts on built heritage, there is likely to be very slight visual impacts on two protected structures should the brownfield subject lands be developed, namely Blarney Castle (Protected Structure Number 00382) and the Church of Ireland church (Protected Structure Number 00382). Views towards these buildings will not be affected but views from them will be slightly altered.

From the upper keep of Blarney Castle when looking northwards and north-eastwards from this vantage point, the view is a panoramic view over Blarney town from the castle and encompasses the castle grounds, adjoining farmland and views towards a local strongly tree-lined ridgeline at Monacnapa, all the way to the urban form of the village core of Blarney and norther residential suburbs along the ridge line (see Figure 2.5 below). Furthermore, it should be noted that approximately 250 metres separate the proposed development area from the castle itself.

Figure 2.5: Village core of Blarney and norther residential suburbs along the ridge line



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, October 2021

Having regard to the foregoing and noting that subject lands are considered brownfield with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve, it is therefore contended that the proposed designation of the subject lands as ACA is unjustifiable, and the removal of the *Proposed* ACA would not be inconsistent with the Proper Planning and Sustainable Development of Blarney.

The *View Management Framework* outlined with the *Cork City Draft Development Plan 2022-2028*, details that Cork City Council seeks to “manage development through its *View Management Framework* in order to protect the views and prospects of special amenity value and the amenities of places and features of natural beauty or interest, where these are not protected by other objectives of

this Plan. These views are seen from places that are publicly accessible and well used and include significant buildings or urban landscapes that help to define Cork City at a strategic level."

It is our Professional Planning Opinion that the designation of the Blarney Castle as a Strategic Landmark Building within the *View Management Framework* regime presented by Cork City Council with the *Cork City Draft Development Plan 2022-2028*, adequately secures the processes in place through the Development Management Process to facilitate the Proper Planning and Sustainable Development of Blarney.

2.2 Removal of the proposed *ZO 02 New Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 01 Sustainable Residential Neighbourhoods*, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for ***New Residential Neighbourhoods*** land use zoning are:

ZO 2 New Residential Neighbourhoods: *To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.*

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

ZO 2.3: *Uses set out under *ZO 1 Sustainable Residential Neighbourhoods* are appropriate under this zone subject to such uses supporting the creation of sustainable communities and not conflicting with the primary objective of this zoning.*

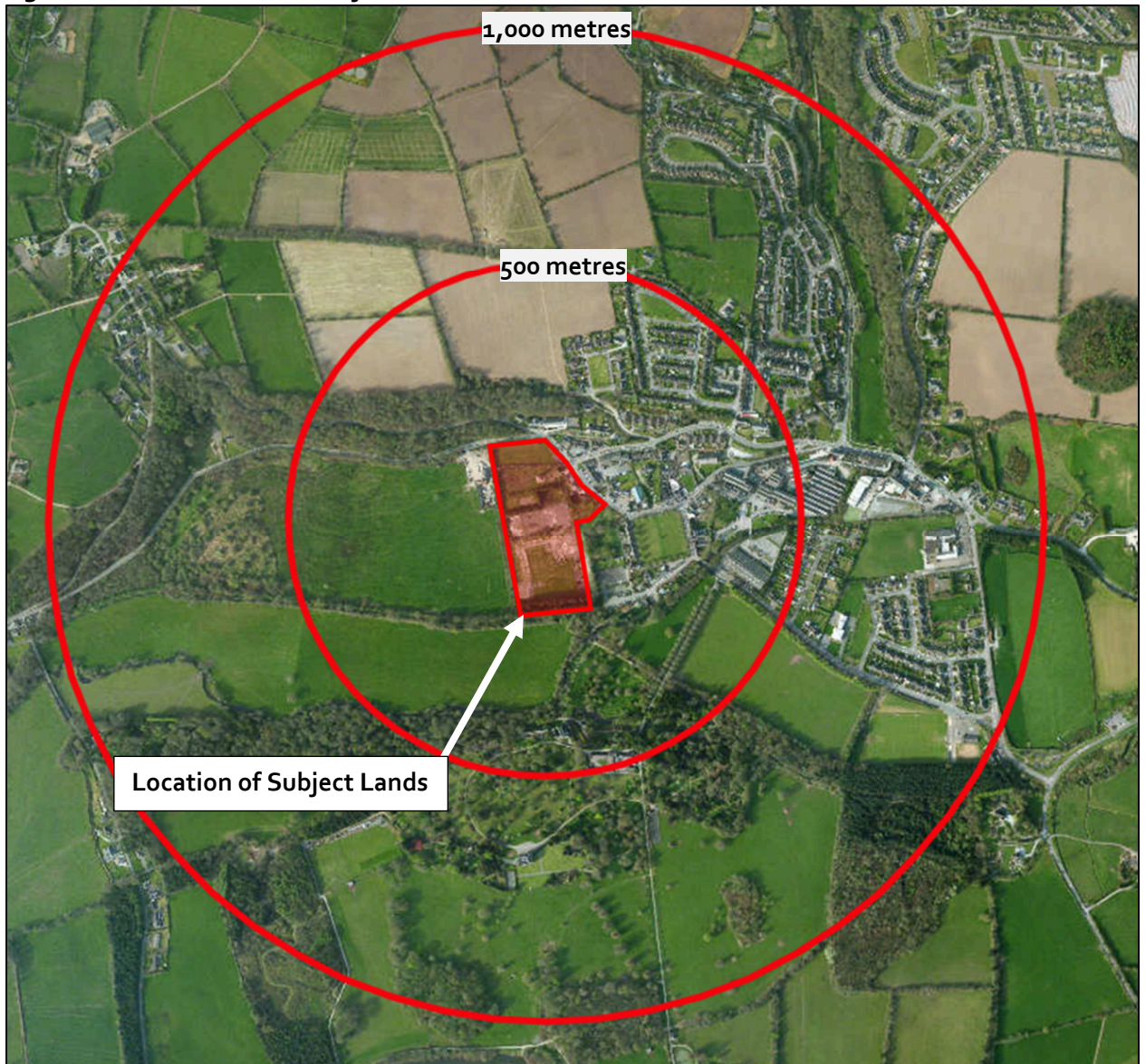
Having regard to the foregoing and noting that subject land is immediately adjacent to Blarney Town Centre, the proposed *ZO 02 New Residential Neighbourhoods* zoning designation of the fully serviced brownfield lands, undermines the ability to present a logical form and pattern of development to support the sustainable and logical growth of Blarney, and does not allow the residents of Blarney to access the town centre via reduced motor vehicle movement.

The *Cork City Draft Development Plan 2022 – 2028* further acknowledges that Blarney remains behind other urban towns in Cork City in terms of construction activity and population growth largely due to infrastructural constraints.

The availability of the fully serviced developable brownfield subject lands located immediately adjacent Blarney Town Centre is however being ignored, or curtailed/hindered/obstructed/impeded from development which will assist to achieve the Development Objectives contained within *Cork City Draft Development Plan 2022 – 2028* in pursuit of a the 15-Minute City Neighbourhood Concept, facilitating development from where residents will be able to walk and cycle to access the resources and facilities within the Blarney neighbourhood. Not only will this reduce car travel and improve health but most of all it will result in an equity in the Quality of Life of Blarney, and thereby Cork's citizens. Within 15 Minutes of people's home, access will be provided to: local commercial services (e.g. shops), a creche, a primary school and other community services, a bus stop, open space, a playground and wildspace (nature).

As illustrated in Figure 2.6 below, the subject site is within 500 metres of the town centre and 1 km to the existing residential neighbourhoods.

Figure 2.6: Location of the Subject Lands



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, September 2021

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for **Sustainable Residential Neighbourhoods** land use zoning are:

ZO 1 Sustainable Residential Neighbourhoods:

To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.

ZO 1.1: *The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City's built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents.*

ZO 1.2: *Development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted.*

ZO 1.3: *Primary uses in this zone include residential uses, crèches, schools, home-based economic activity, open space and places of public worship.*

ZO 1.4: *Uses that contribute to sustainable residential neighbourhoods are also acceptable in principle in this zone provided they do not detract from the primary objective of protecting residential amenity and do not conflict with other objectives of this Development Plan. Such uses include but are not limited to: small-scale local services including local convenience shops; community facilities; cultural facilities; hotels and hostels; live-work units; service stations (petrol filling stations); local medical services; third level education institutes; community based enterprise or social enterprises, health facilities including hospitals.*

Having regard to the foregoing and noting that subject lands are considered brownfield, fully serviced, and located immediately adjacent to Blarney Town Centre, it is therefore contended that the proposed designation of the subject lands as *ZO 02 New Residential Neighbourhoods* is unjustifiable representing the non-effective and underutilisation of centrally located and fully serviced lands.

It is therefore requested that the subject lands be zoned *ZO 01 Sustainable Residential Neighbourhoods*, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre and will adequately secure the focussed development of these lands by consolidating the village and being within close walking distance of all facilities through, thereby facilitating the Proper Planning and Sustainable Development of Blarney during the life span of the *Cork City Draft Development Plan 2022 – 2028*.

2.3 Providing for specific convenience use(s) with a Net Retail Sales Area of 2,000 sq m or less, be facilitated on the subject lands at St. Ann's Road, Monacnapa, Blarney, Co. Cork, represent more of a 'local shopping' function

Having regard to the foregoing and noting that the subject land is immediately adjacent to Blarney Town Centre, provides the ability to present a logical form and pattern of development to support the sustainable and logical growth of the settlement in terms of providing commercial uses on the subject site. This will support the surrounding residential communities due to the location of the subject site in proximity to the town centre and residential neighbourhoods.

The *ZO 01 Sustainable Residential Neighbourhoods* include for uses considered to be a local convenience shop, however no further details are provided in terms of what constitutes, or defines, a local convenience shop.

Subject to the key retail tests in terms of the *Retail Planning Guidelines (2012)*, the location of new Foodstores should be promoted to complement the fulfilment of the local shopping function.

In terms of the *Retail Planning Guidelines (2012)*, new convenience space should be accommodated in areas where such need can be demonstrated through the key retail tests:

- Justifying Need;
- Impact;
- Sequential Test; and
- Ensuring that the development is of an Appropriate Scale (that such additional space can be accommodated).

Having regard to the foregoing and noting that clarity is required in terms of the Planning Authority's interpretation of the term 'local convenience shop', the extent of which is either established by the provisions of the *Retail Planning Guidelines* (2012), or the inclusion of a fixed Net Retail Sales Area of 2,000 sq m to the *ZO 01 Sustainable Residential Neighbourhoods* use referencing 'local convenience shop'.

It is therefore requested that the paragraph *ZO 1.4* of the *Cork City Draft Development Plan 2022 – 2028* be amended with the additional text identified in red, to read as follows:

***ZO 1.4:** Uses that contribute to sustainable residential neighbourhoods are also acceptable in principle in this zone provided they do not detract from the primary objective of protecting residential amenity and do not conflict with other objectives of this Development Plan. Such uses include but are not limited to: small-scale local services including local convenience shops limited to 2,000 sq m Net Retail Sales Area; community facilities; cultural facilities; hotels and hostels; live-work units; service stations (petrol filling stations); local medical services; third level education institutes; community based enterprise or social enterprises, health facilities including hospitals.*

4.0 CONCLUSION

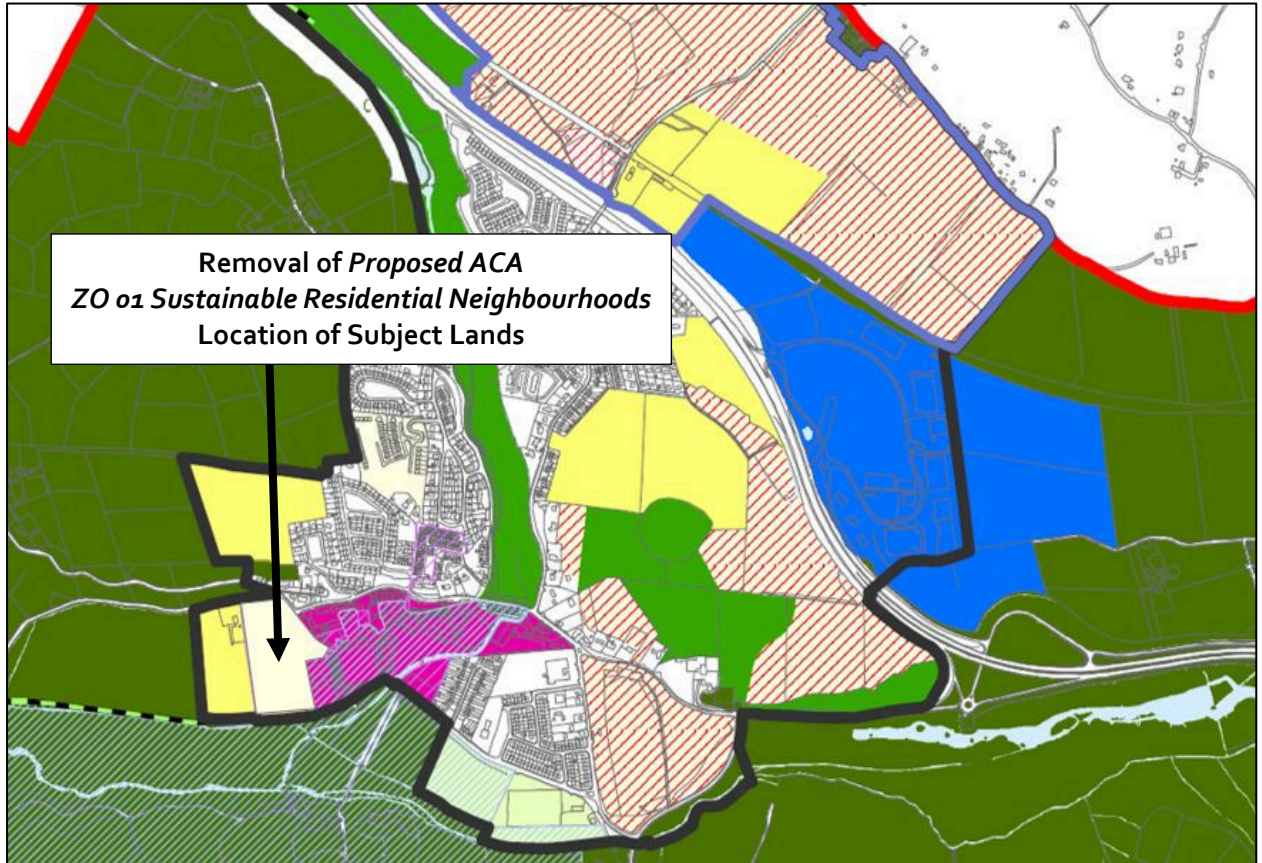
In summary, we request the:

1. Removal of the designation for *Proposed ACA* as the subject lands are brownfield with no justification or key buildings / groups of buildings of Architectural, Historical or Cultural merit, worthy to Conserve.
2. Removal of the proposed *ZO 02 New Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 01 Sustainable Residential Neighbourhoods* zoning, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre.
3. Removal of the proposed *ZO 07 Urban Town Centre* zoning designation of on the Surface Carpark located to the southeast of the subject lands, and assign the *ZO 15 Public Infrastructure and Utilities* to the extensive Surface Carpark acknowledging the lands being use for the purposes of Carparking located immediately adjacent Blarney Town Centre and serving the Blarney Castle tourism attraction.

The subject lands represent an opportunity to provide:

- for a more logical Settlement Plan Boundary,
- for a more efficient use of fully served urban lands,
- for a more sequential and logical zoning pattern,
- for more sustainable '15-Minute City Neighbourhood Concept' patterns of development, and
- in greater accord with the Proper Planning and Sustainable Development of Blarney.

Figure 4.1: Zoning Objectives south within new *Cork City Development Plan 2022 – 2028*



Source: *Cork City Draft Development Plan 2022 – 2028*, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully

Wessel Vosloo
Principal
The Planning Partnership