

Blarney Submission

Submission to the Draft Cork City Development Plan
on behalf of Blarney Castle Estate

October 2021



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

Document Control Sheet

Client	Blarney Castle Estate	
Project Title	Submission to Draft Cork City Development Plan	
Document Title	Blarney Submission	
Document Comprises	Volumes	
	Pages (Including Cover)	28
	Appendix	1
	Attachment	2
Prepared by	Christine Ebschner-Hyland	
Checked by	Mairi Henderson	
Office of Issue	Cork	
Document Information	Revision	3
	Status	Final
	Issue Date	October 2021

CORK	DUBLIN
6 Joyce House	Kreston House
Barrack Square	Arran Court
Ballincollig	Arran Quay
Cork	Dublin 7
P31 YX97	D07 K271
www.mhplanning.ie	T. +353 (0)21 420 8710
	T. +353 (0)1 676 6971

Contents

1. Introduction	3
2. Blarney's Historic and Contemporary Context	6
2.1 Historic Context	6
2.2 Contemporary Context	6
3. Planning Policy Context.....	8
3.1 National Planning Framework 2040.....	8
3.2 Regional Spatial and Economic Strategy for the Southern Region .	8
3.3 Draft Cork City Development Plan 2022.....	9
3.3.1 Tourism	9
3.3.2 Population Growth	10
3.3.3 Residential Zoning	10
3.3.4 City Hinterland	11
3.3.5 Heritage Led Plans.....	12
3.3.6 Architectural Conservation Area (ACA) & Protected Structures	12
3.3.7 View Management Framework.....	12
3.3.8 Light Industry Expansion in Blarney and Hollyhill.....	13
4. Submission Rationale	14
4.1 Location and Potential Impact of New Residential Development	14
4.1.1 Expansion of the City Hinterland Zoning.....	16
4.1.2 Monacnapa Lands	17
4.2 Protection for Woodland Between Blarney and Tower.....	18
4.3 Scenic Views and Scenic Viewing Locations	19
4.4 Expansion of ACA.....	20
4.5 Expansion of Blarney Business Park.....	22
4.6 Expansion of Light Industry Zoning at Hollyhill	23
5. Conclusion	25
Appendix A	28

1. Introduction

This submission to the Draft Cork City Development Plan 2022-2028 (DCCDP) has been prepared by McCutcheon Halley, in conjunction with Southgate Associates and Forestbird Design on behalf of Blarney Castle Estate (BCE).

As custodians of Blarney Castle and Estate, BCE are directly linked with the historic village development and its economy. While the international cultural significance of Blarney Castle and Blarney have been recognised for well over 100 years, its sustainable future and potential significant growth as a tourism asset requires that the unique heritage character of Blarney is supported through policy in the DCCDP.

In line with National and Regional policy, we therefore request the following amendments for the DCCCP:

- I. Re-zone lands west of the Former Blarney Hotel Site from "ZO 02 New Residential Neighbourhoods" to "ZO 21 City Hinterland" which are within the centreline of views from the Architectural Conservation Area (ACA) and Blarney Castle, affecting negatively the significance and special character of the setting and its intangible cultural heritage.
- II. Re-zone the lands at Monacnapa from "ZO 02 New Residential Neighbourhoods" to "ZO 21 City Hinterland" which are within the centreline of views from the Architectural Conservation Area (ACA) and Blarney Castle, affecting negatively the significance and special character of the setting and its intangible cultural heritage.
Alternatively, provide for "ZO 21 City Hinterland Zoning" above the 72m contour line and provide development parameters for the remainder of the land including adequate offset to the southern boundary and lower density development.
- III. Provide for the protection of mature/historic woodland as part of the "City Hinterland Zoning ZO 21" and as part of "Objective 10.65 Blarney Hinterland". Provide statutory protection for adequate buffers on zoned lands for root zones.
- IV. Blarney Castle be designated as a strategic viewing location in addition to the designation as landmark building and strategic views be identified for key areas.
- V. The expanded area of the ACA should include a 15m buffer zone on the approach roads to the ACA and include Blarney National School, in recognition of its significant architectural contribution at the western gateway to the ACA and its historic link to BCE and Blarney.
- VI. The impact of residential and retail development in the vicinity and within the ACA must be assessed in terms of traffic impacts on the smooth running of the tourism offering and local connectivity, permeability and amenity value.
- VII. The high density housing needed to fulfil the growth strategy for Blarney should be directed and prioritised to the north and east of the historic core where its impact can be managed in line with sustainable development goals and not to the detriment of Blarney's

historic core, the viewshed to and from the Castle and the historic landscape setting of the village.

VIII. The Blarney Business Park Expansion Area should include as a core objective the provision of an overall landscape master plan and other mitigation measures in terms of material colours and height restrictions in order to mitigate the impact of new development on long range views from Blarney Castle.

IX. Remove the expansion area to the north of the existing Apple centre of the Hollyhill Industrial Estate, to avoid further encroachment on long-distance views from Blarney Castle. The proposed expansion west of Hollymount Industrial Estate (north of Blarney Road) requires well landscaped areas as mitigation measures.

The attached document by Southgate Associates further expands on these policy requests, seeking additional detailed amendments to the DCCDP as follows:

X. Provide a sustainable tourism objective to support the unique setting of the built heritage tourist attractions of Blarney and to safeguard the intangible cultural heritage associated with them, by careful control of new additions or alterations to their immediate and wider setting.

XI. Provide a historic landscape objective to carefully control the siting, design, materials, use and scale of development where it would be visible from the ACA, to ensure that views and vistas to and from the ACA are respected.

XII. Provide a development objective to ensure that the character and integrity of the ACA is maintained by recognising that new development adjacent and at a distance from the ACA can affect the ACA's character. The siting, design, material and use of such development should be carefully considered not to have a negative impact.

XIII. Provide a development objective for public realm improvements within the historic core to ensure that they are designed to enhance and support the historic character.

XIV. Reduce in size Tier 3 lands on the eastern approach to Blarney's historic core to provide a 15m buffer zone, controlling development in a manner similar to an ACA.

XV. Include the requirement for development and associated landscaping to be of sympathetic scale, materials, use and design, which is visible from and connects to the ACA, as an addition to Section 1.133.

XVI. In addition to Section 1.135, recognise that enhancing the historic character and integrity of the ACA should be at the core of larger-scale residential and mixed-use development.

The attached report by Forestbird Design supports the submission by providing the landscape rationale for identifying the important views to and from BCE and the ACA.

Included as an appendix to this submission is a woodland report, provided by Forestbird Design, highlighting the opportunities and threats to the woodland and submitting that development on zoned lands must take into account the presence of mature lands and ensure Root Protection Areas.

This submission is structured as follows:

1. Introduction
2. Blarney's Historic and Contemporary Context
3. Planning Policy Context
4. Submission Rationale
5. Conclusion

2. Blarney's Historic and Contemporary Context

2.1 Historic Context

Blarney is historically a planned village, dating to 1765, which was developed in conjunction with Blarney Castle and Demesne and its successful linen and Woollen Mills industry.

It became a tourist attraction during Victorian times, aided by the development of the train station, the establishment of St. Anne's Hydropathic Spa and the attraction of Blarney Castle and Gardens, which have been a tourist attraction in their own right since at least the eighteenth Century.

This tourist function has endured despite the demise of the spa and the train station and annual visitor numbers testify to the continued success of the attraction, which has been complimented by retail and hospitality offerings.

The historic village core plays an important part in the overall historic context, particularly the village green and the Church of Ireland Church, which form a set-piece view from the historic demesne. The surrounding rural landscape is equally important to the medieval castle. Both provide the setting for the ritual of 'Kissing the Blarney Stone', which has gained world-wide renown and is the foremost visitor draw to Blarney – requiring the visitor to climb to the battlements of the tower house and to 'kiss the Blarney Stone', gaining persuasive eloquence in the process, or more precisely 'the Gift of the Gab'. While doing this, the visitor is provided with an encompassing view of the surrounding landscape and the village as they can be viewed from the battlements.

The historic unit of Castle, village core and historic landscape convey an extraordinary experience, which relies on the contrast of the imposing Castle, the modest and orderly village square and the woods and pastoral landscape, interwoven with the myth of the Blarney Stone. Together, they provide a significant and special setting and convey the intangible cultural heritage of Blarney.

2.2 Contemporary Context

Blarney has expanded from a village to a town and is the home to a population of over 2,500, providing employment in the tourism and hospitality industry and in businesses in the Blarney Business Park and elsewhere. The historic core, Blarney Castle and Garden and the adjacent woodlands are an important amenity for the local population and the main reason for the continued success of attracting tourism to Blarney, with national and international renown.

The landownership outline of Blarney Castle Estate and its direct relationship with the town is illustrated in Figure 1.

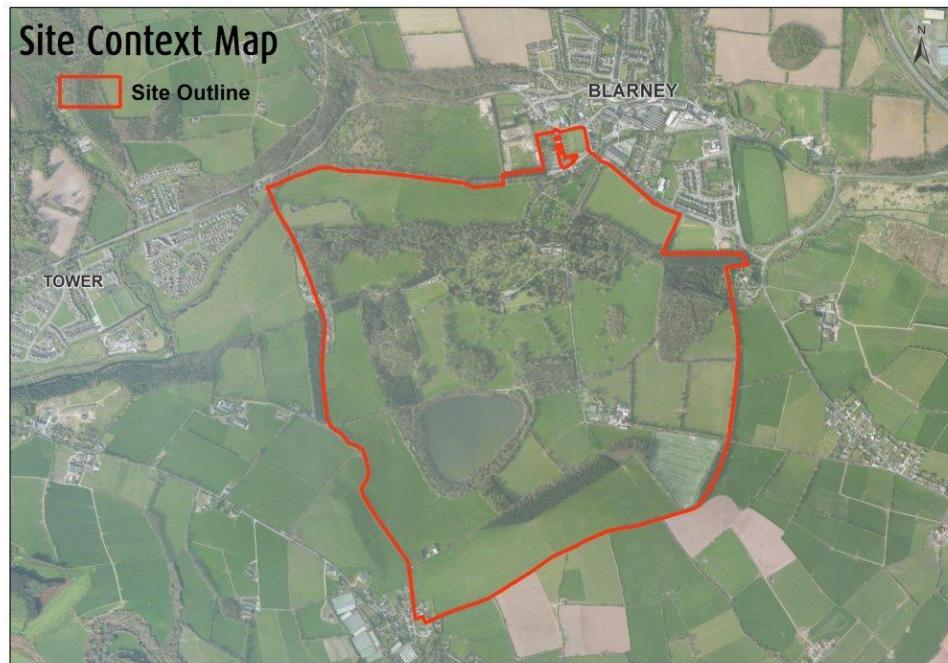


Figure 1: Blarney Castle Estate landholding

As part of the Wildlife Estates network since 2015, Blarney Castle Estate fulfils an important role in the management of the area's biodiversity and carbon sequestration, with international recognition as part of the Wildlife Estates Label.

3. Planning Policy Context

3.1 National Planning Framework 2040

The National Planning Framework 2040 (NPF) supports the growth of the three cities in the Southern Region and their respective county towns to drive population and economic growth in the region. The NPF also recognises that Ireland's tourism has a critical role to play in the country's economic strength. The NPF notes that housing development in the South West area (Cork and Kerry) should be based on employment growth, higher densities, access to amenities and sustainable transport modes, in order to avoid long-distance commuting patterns and quality of life impacts. The NPF emphasises that in the context of the larger towns in the South West Regional area there should be:

“...tailoring policy approaches to capitalise quality of life and sectoral strengths, such as agri-food, energy, tourism and the marine...”

(NPF, p.46)

3.2 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy for the Southern Region (RSES) recognises Blarney Castle as one of the most significant attraction and destination in the South West, contributing to the wealth of natural, cultural and heritage assets of national importance within the Region. The RSES also notes that Blarney has a role to play in the sustainable growth of Metropolitan Cork, as a Metropolitan Town located on the suburban rail network. It notes that the development of new commuter rail stations in Metropolitan Cork, including the delivery of a new station at Blarney / Stoneview, is one of the transport priorities for Cork Metropolitan Area. The RSES enablers for the development of Cork Metropolitan Area include:

- *“Progressing the sustainable development of new areas for housing, especially those on public transport corridors such as Monard and urban expansion areas on the rail corridor such as at Carrigtwohill, Midleton, Cobh and Blarney.”*
- *“Protecting built and natural assets”.*

(RSES, Extract from Key Enablers, p. 243)

Blarney falls within the Cork Metropolitan Area and the RSES includes the Cork Metropolitan Area Strategy (Cork MASP). As well as setting objectives for the population growth of Metropolitan Cork, the Cork MASP includes objectives to diversify and drive the role of vibrant tourism in the region, Policy Objective 15 of the Cork MASP sets out the vision for tourism, see Figure 2.

Cork MASP Policy Objective 15

Cork MASP Tourism

- a. Support the role of Metropolitan Cork's tourism assets as a significant domestic and international tourism destination capitalising on its tourism attractions, Ireland's Ancient East corridor, Wild Atlantic Way Corridor, Ireland's Maritime Paradise theme and support initiatives creating a sustainable tourism future, diversifying the tourism product into non-traditional areas and extending the tourist season taking particular care of the natural and built environment.
- b. The SRA seeks investment in the sustainable development of tourism infrastructure and tourism services across Cork and support initiatives arising from the Pure Cork brand and the "Growing Tourism in Cork: A Collective Strategy" subject to the outcome of environmental assessments and the planning process.
- c. Support the delivery of large-scale all year-round tourist attraction(s) in Cork City and in County Metropolitan Cork.
- d. Value and support cultural amenities, conservation, protection and enhancement of Cork City's natural heritage as key assets to attract tourism.
- e. Seek sustainable tourism development which reflects the city's distinctive history, culture and environment.
- f. Promote diversification and innovation in the tourism sector.
- g. Seek an integrated approach to tourism development in conjunction with a wide range of stakeholders including state agencies, communities and stakeholders in the tourism sector.

Figure 2: Cork MASP Policy Objective 15

The tourism policy objective aims to support the role of Metropolitan Cork's tourism assets as a significant domestic and international tourism destination, taking particular care of the natural and built environment. It aims to value and support cultural amenities, conservation, protection, and enhancement of Cork City's natural heritage as key assets to attract tourism.

3.3 Draft Cork City Development Plan 2022

The DCCDP seeks to provide for the future development and growth of Blarney. Following are the proposed policies that will directly influence Blarney's historic core.

3.3.1 Tourism

The DCCDP recognises Blarney Castle and Gardens as being within the top-10 of fee-charging visitor attractions in the State in 2019 (Section 7.68, page 234).

Section 7.69 proposes that the economic contribution of tourism is maximised,

"while protecting the invaluable assets that are our natural, built and cultural heritage"

(Volume 1, Chapter 7, page 234).

The draft plan notes, that the tourist attraction, which is Blarney Castle, relies on the quality and attractiveness of the built and natural heritage of the local area and that there is need to have regard to the impacts of proposed development on both Blarney Castle and the wider Blarney Estate (see Section 10.245 and section 10.246).

The draft Plan states that

"Future development within the vicinity of the (Blarney Castle) Estate should not compromise the landscape and heritage character of the area on which the local tourism economy relies"

(Volume 1, Chapter 10, Section 10.246, p.395).

3.3.2 Population Growth

The proportionate population growth rate for Blarney is 131%, which is double the amount of Ballincollig and Glanmire. This actual population growth of 3,331 is anticipated for 2028, on Tier 01 and 02 lands. In addition, large areas for proposed residential development in East Blarney are Tier 03 Residential Neighbourhoods (116 ha), with a potential yield of 5,463 units. Tier 03 lands are considered unlikely to be serviced during the lifetime of the plan and are therefore not included within the Core Strategy for calculation purposes.

3.3.3 Residential Zoning

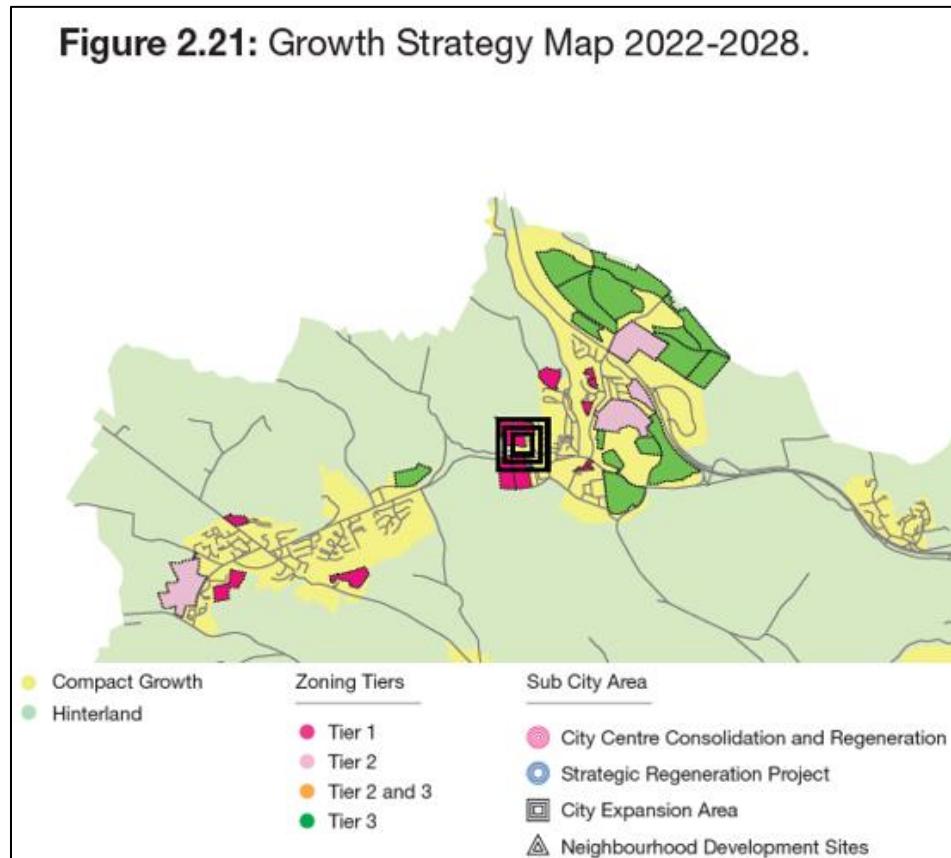
East Blarney is named as one of seven strategic areas within and adjoining the existing City as a location for city consolidation and expansion (DCCDP, page 47). The lands are identified as Tier 3 lands in Stoneview and Ringwood as investment in transport and utilities infrastructure is required to enable growth (Volume 1, chapter 10, sections 10.232, 10.233, 10.234).

The objectives for Tier 3 lands are set out with Zoning Objective 3:

Zoning Objective 3: "To provide for new residential development in the long term, in tandem with the provision of the necessary social and physical infrastructure."

West Blarney is identified as the area near the historic core of Blarney, including lands in Monacnapa, the Former Hotel Site and lands west of the Former Hotel Site.

The majority of these lands are indicated as Tier 1 lands and are the location for the initial residential growth for Blarney. In addition, brownfield sites close to the centre of Blarney may be suitable for residential development (section 10.235). A 'City Expansion Area' is identified north west of the historic village core, comprising the Monacnapa area, the northern part of the former hotel site and adjoining areas, see figure 3.

Figure 2.21: Growth Strategy Map 2022-2028.

3.3.4 City Hinterland

The City Hinterland Zoning ZO 21 provides for the protection and improvement of rural amenity and the development of agriculture.

ZO 21.1 specifies:

"The primary objective of this zone is to preserve the character of the City Hinterland generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity. Rural-related business activities which have a demonstrated need for a rural location are also permissible. Any development associated with such uses should not compromise the specific function and character of the City Hinterland in the particular area".

ZO 21.3 provides for:

"The City Hinterland helps to maintain a clear distinction between urban areas and the countryside and avoid the harmful impacts of urban sprawl".

Objective 10.65 Blarney Hinterland provides for:

"Consolidate future development within the development boundary of the Town and maintain the City Hinterland between Blarney and Tower and Kerry Pike respectively".

3.3.5 Heritage Led Plans

Blarney and Tower are identified as Urban Towns within the city area. Growth within the Urban Towns is to be proportionate to the existing population, should focus on sustainable transport and apply measures to reflect and enhance the individual character of each town.

Part of this strategy are Heritage led plans for Blarney and Tower, which are identified as Key Deliverables (DCCDP, Table 2.5, Volume 1, Chapter 2, Page 57).

3.3.6 Architectural Conservation Area (ACA) & Protected Structures

The draft plan proposes to extend the ACA to include the Former Hotel Site and a site south of the Blarney Woollen Mills, east of the River Martin where a car park and former factory building (NIAH Reg. no. 20845014) are located. The Blarney National School (Scoil Chroí Íosa an Bhlárna) is not included in the ACA extension.

An additional ACA is proposed north of the village core at Mangerton, Telephone and Muskerry Terrace.

Section 1.135 of Volume 3, part 1 notes:

"Development adjacent to the village would require that visitor and local needs be balanced, however, the opportunity exists to further enhance the historic character of the village with every development proposal".

Objective 8.1a ensures the protection and preservation of archaeological monuments. Objective 8.1e. provides that development reflects and is sensitive to the historical importance of an archaeological monument, including the character of the city and its hinterland, plot sizes, building heights and scales, applicable to the protected structures of Blarney Castle Estate.

3.3.7 View Management Framework

Blarney Castle is identified as a Strategic Landmark, where the linear views of the building are to be protected through the management of development (Section 6.30). The policy characterises a strategic landmark building as

"those that are widely appreciated due to their visual prominence and the role that they play in helping people orientate themselves within the city"

(Volume 1, Chapter 6, Section 6.30, page 186).

The scenic route between Clogheen, Tower, Blarney and the Road to Blarney Lake (Ref. HVP3) is retained in the draft plan.

Policy is also available to designate for 'Strategic Viewing Locations', as is the case for Blackrock Castle, including the identification of Strategic Linear Views. The policy provides that

"within these views Strategic Landmark Buildings / Strategic Cityscapes and Strategic Landscapes are identified"

(Volume 1, Chapter 6, Section 6.29, page 186).

3.3.8 Light Industry Expansion in Blarney and Hollyhill

Objective 7.10 provides for "New Strategic Employment Sites" and specifies that it will take account of other Development Plan objectives, including "protecting cultural and built heritage".

Blarney Business Park

The Blarney Business Park is proposed to be extended by 22.5 ha, east of the existing Business Park.

Objective 7.10a refers to the proposed Blarney Business Park as a high-quality extension of the existing Business Park:

"To provide for a high-quality extension to Blarney Business Park using the existing access to the Park. Any proposed development needs to safeguard the M/N20 (navy) route option which traverses part of the land until such time as a preferred route is chosen and the requirement lapses if the navy route is not chosen as the preferred route."

Land at Hollyhill

The DCCDP proposes an extension to the north of the existing Apple facility at Hollyhill and to the west of the existing Hollymount Industrial Estate (north of Blarney Road). Objective 7.10g provides for:

"New Strategic Employment Sites – Land at Hollyhill: To provide for a high-quality business and technology scheme capable of accommodating expansion and other strategic investment in a manner that seeks to protect the surrounding landscape setting."

4. Submission Rationale

By making this submission on behalf of BCE, we wish to acknowledge that the DCCDP provides for important strategic aims and improvements for Blarney, namely the welcome expansion of the ACA, the designation of Blarney Castle as a Landmark Building and the key deliverable of providing heritage led plans for Blarney and Tower.

All these measures will contribute to the continued success of Blarney's role as a tourist destination and will enhance the village context for visitors and locals alike.

Other objectives in the DCCDP will however undermine the historic setting and context of the castle and village core and have the potential of causing irrevocable damage to an identity that is dependent on the iconic landscape and the historic buildings within.

4.1 Location and Potential Impact of New Residential Development

The existing population of Blarney comprises 2,550 persons according to Census 2016. The DCCDP provides for a proportionate population growth rate for Blarney of 131%, which is double the amount of Ballincollig and Glanmire. This actual population growth of 3,331 is anticipated for 2028, on Tier 01 and 02 lands. In addition, large areas for proposed residential development in East Blarney are Tier 03 Residential Neighbourhoods (116 ha), with a potential yield of 5,463 units. Tier 03 lands are considered unlikely to be serviced during the lifetime of the plan and are therefore not included within the Core Strategy for calculation purposes.

The plan notes, that the tourist attraction, which is Blarney Castle, relies on the quality and attractiveness of the built and natural heritage of the local area and that there is need to have regard to the impacts of proposed development on both Blarney Castle and the wider Blarney Estate (see Section 10.245 and section 10.246).

The draft Plan states that:

"Future development within the vicinity of the (Blarney Castle) Estate should not compromise the landscape and heritage character of the area on which the local tourism economy relies"

(Section 10.246, p.395).

We submit that large scale residential development near the historic core will be detrimental to the historic and cultural integrity of the ACA and to the setting and view sheds of the Castle, as illustrated in Figure 4.

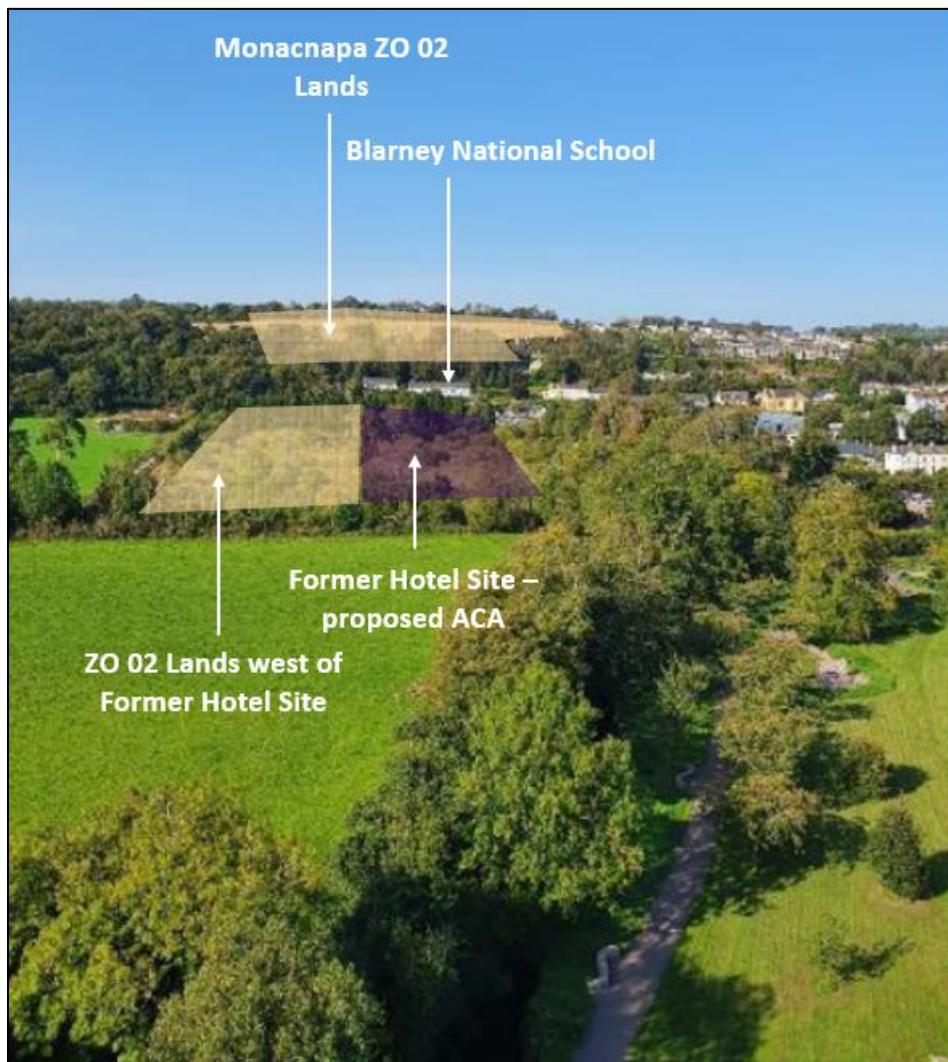


Figure 4: Northern viewshed from Blarney Castle with approximate areas of the extended ACA and proposed residential zoning (Base Image: Southgate Associates).

Future development on Tier 3 lands in East Blarney would however be more suitable for the planned expansion of Blarney, as it is in a sustainable location and not in conflict with the historic core, as identified in the NPF and the RSES in regard to sustainable development objectives.

Changing West Blarney's perception of a historic village to a suburban town will have detrimental consequences to its intrinsic value and will irrevocably damage its visitor appeal – in conflict with the stated key deliverable of a heritage led plan for Blarney and Tower and the support that the DCCDP gives to safe-guarding the landscape and heritage character of the area on which the local tourism economy relies (Section 10.246).

All expansion areas will have implications on traffic volumes and the servicing of the future population with social and physical infrastructure, but such development in the environs of the ACA will be most detrimental to the integrity of the ACA, the viewsheds to and from the Castle and the overall visitor experience.

The policy aim should therefore facilitate and prioritise development at Blarney East (Stoneview), which would allow for sustainable development along the rail corridor and to minimise the expansion of residential development in West Blarney (historic village area). In West Blarney, the focus should be on the sensitive development of brownfield lands and infill sites, and the assessment of impact on the ACA, BCE and Blarney as a visitor destination.

4.1.1 Expansion of the City Hinterland Zoning

The Greenbelt (ZO 21 – City Hinterland) around Blarney is part of the Prominent and Strategic Cork City Hinterland Areas and provides the important function of surrounding the built up area of Blarney, providing a recognisable development boundary and preventing sprawl as identified in Objective ZO 21.3 and sections 2.57 and 10.346 of the DCCDP.

In the context of West Blarney, the greenbelt area historically presented fields, woods and gardens as the backdrop to the historic village core, highlighting the fact of a rural settlement, and conveying the medieval context of village and castle, in contrast to nearby Cork City.

In recent decades, the function of the greenbelt has been weakened by continuous development, however it still contributes to the essence of the village and Castle nestling within the rural landscape, by safeguarding the greatest possible extent of this sensitive landscape.

The greenbelt is an important strategic measure, in addition to the scenic views and strategic landmark and viewing location, which allows that Blarney village can be perceived as a smaller entity, giving the impression that the scale of Blarney, as a pleasant visual perception, is protected.

We submit that in order to not further negatively affect the significance and special character of the setting and the intangible cultural heritage of the ACA and BCE, the area west of the Former Hotel Site would not be built upon. We therefore request to re-zone lands west of the former Blarney Hotel Site from "ZO 02" to "ZO 21 – City Hinterland".

Summary:

Objective	Tier 3 Lands in Stoneview, Tier 1 & 2 Lands in West Blarney (Map no 11)
Comments	<p>We request that Blarney's expansion and population growth is prioritised and facilitated in Stoneview and that new development near the historic core of West Blarney is minimised for the benefit of the ACA, and the historic landscape setting and the infrastructural demands of facilitating visitor access to Blarney.</p> <p>An expansion of the City Hinterland zoning will safeguard the sensitive and historic landscape near the historic core of Blarney Village and Blarney Castle, in order to prevent further development, which would damage the historic setting of the village and its function as a heritage site and national visitor attraction.</p>
Recommended Update	<p>Designate lands in Stoneview as Tier 2 lands and re-zone lands west of the former Blarney Hotel Site from "ZO 02" to "ZO 21 – City Hinterland".</p>

4.1.2 Monacnapa Lands

We submit that the Monacnapa lands are within the northern viewshed of BCE, and development will negatively affect the views and setting of the ACA and BCE. We therefore submit to re-zone the entire land parcel at Monacnapa as "ZO 21 City Hinterland". We submit as an alternative, to provide development parameters for the Monacnapa lands which include lower density development, an adequate offset to the southern boundary, and that the area at or above the 72m contour line in Monacnapa townland is designated as "ZO 21 – City Hinterland". The latter has been established as the development line in previous applications in order to ensure the visual integrity of views from the Castle. It is provided for with Zoning Objective BL-R-03 in the Blarney Macroom Municipal District Local Area Plan 2017.

BL-R-03: "Medium Density Residential Development including detached dwellings, limited to the lower portion of the site. The upper part of the site, closer to the ridge, is generally unsuitable for development and should be retained as open land uses with long term strategic planting as part of the overall scheme."

The DCCDP has the opportunity to retain this development objective in recognition of the sensitive landscape setting and infrastructural demands that do not provide for sustainable development at Monacnapa.

Summary:

Objective	ZO 02 Lands in Monacnapa (Map no 11)
Comments	The Monacnapa lands are within the northern viewshed of BCE, and development will negatively affect the views and setting of the ACA and BCE.
Recommended Update	Provide for "ZO 21 City Hinterland Zoning" for the entire Monacnapa lands or alternatively, provide for "ZO 21 City Hinterland Zoning" above the 72m contour line and provide development parameters for the remainder of the land including adequate offset to the southern boundary and lower density development.

4.2 Protection for Woodland Between Blarney and Tower

The City Hinterland Zoning under Objective 21.1 provides for the preservation of the character of the City Hinterland zoning for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity.

We submit that the City Hinterland Zoning should include the use of mature/historic woodland. Mature woodland contributes to the historic landscape and sense of place, as it is typically in existence for more than 100 years and it makes a valuable contribution to alleviating climate change in terms of carbon sequestration. This is especially the case for the historic and mature woodland between Tower and Blarney as it is part of the historic setting of BCE. By including mature/historic woodland as a specified use of zoning objective ZO 21 and by specifying its protection in "Objective 10.65 Blarney Hinterland", the DCCDP would contribute to its recognition, protection and sustainable management into the future.

We further submit that the DCCDP provides statutory protection for adequate buffers on zoned lands for root zones, as development on zoned lands must take into account the presence of mature trees on adjacent lands and ensure Root Protection Areas are incorporated into any design in accordance with national and EU guidelines for root protection.

Please find in appendix 1, a document provided by Forestbird Design, further expanding on the need to add Root Protection Zones as an integral part of the DCCDP in Chapter 6 or similar.

Summary:

Objective	ZO 21 City Hinterland & 10.65 Blarney Hinterland; Text in Chapter 6
Comments	<p>Historic/mature woodland makes a valuable contribution to the landscape of the City Hinterland and contributes to biodiversity, recreational uses and carbon sequestration.</p> <p>It requires recognition and protection especially in the area between Tower and Blarney as part of the historic landscape setting of BCE.</p> <p>Development on zoned lands must consider the presence of mature trees on adjacent lands and ensure Root Protection Areas are incorporated into any design proposal.</p>
Recommended Update	<p>Include 'historic/mature woodland' as part of the use of objective ZO 21.1.</p> <p>Include 'the protection of historic/mature woodland' in Objective 10.65.</p> <p>Provide statutory protection for adequate buffers on zoned lands for root zones.</p>

4.3 Scenic Views and Scenic Viewing Locations

Blarney Castle is identified as a Strategic Landmark Building, where the linear views of the building are to be protected through the management of development (Section 6.30).

The scenic route between Clogheen, Tower, Blarney and the Road to Blarney Lake (Ref. HVP3) is retained in the draft plan.

We welcome the retention of the scenic route and the designation of Blarney Castle as a Strategic Landmark Building. Given the outstanding visitor numbers, and the sensitive nature of the surrounding landscape, it is evident, that Blarney Castle should also be designated a Strategic Viewing Location. This will allow for

- the identification of Strategic Landmark Buildings / Strategic City Scapes, i.e. the ACA area of Blarney and
- Strategic Landscapes, i.e. the historic landscape that provides the pastoral setting of the ACA.

This designation would identify strategic views, as demonstrated in the DCCDP for Blackrock Castle, and help to safeguard these views.

We recognise that the anticipated heritage plan for Blarney must identify such views, but their incorporation in the Cork City Development Plan review

now, will ensure that zoning and land use objectives do not conflict with providing for such views.

The accompanying document by Forestbird Design identifies which views are of particular importance and demonstrates why their inclusion in the Cork City Development Plan is merited. The views convey the sense of arrival in the village, allowing the visitor and local to orient themselves. Moreover they are part of the overall visitor experience when viewing the area from the Castle Tower and they also provide the context for historic links, for example the view of the local Blarney National School, north of the Castle, framed by the mature woodlands, which was a gift by Sir George and Lady Colthurst (Blarney Castle) to the local community in 1898, and is one of many links of how the Castle and the village have been intertwined for centuries.

Summary:

Objective	View Management Framework – Map 06
Comments	We request that the strategic and important views to and from Blarney Castle are identified and protected as they are an intrinsic part of the historic and cultural setting and visitor experience. Please refer also to attached report by Forestbird Design.
Recommended Update	Amend the map to designate Blarney Castle as a Strategic Viewing Location in addition to the designation as Strategic Landmark Building and identify the strategic views.

4.4 Expansion of ACA

We commend the DCCDP for expanding the area of the existing ACA, as it strengthens and supports the existing ACA and provides for sensitive development objectives for any new development proposals.

We submit that in consideration of the importance of the National School Building as part of the Castle's heritage, the inclusion of this building within the ACA would be important in regard to the integrity of the western gateway (R 617- St Ann's Road) and as part of the northern viewshed from the Castle.

We further submit to expand the proposed new ACA to include a 15m wide buffer zone on both sides of the public road on approaches to Blarney village centre and the existing ACA (please see figure 5). This would create a buffer zone Landscape Character Area, protecting views to and from the ACA and mitigating against the impact of numerous small changes and the attrition of the special character of the area.

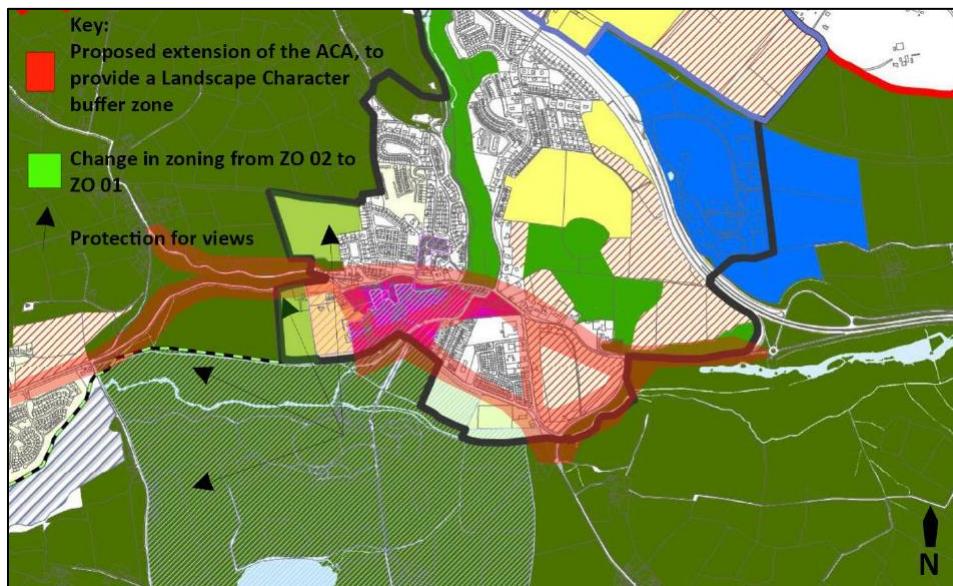


Figure 5: Proposed extent of ACA expansion along approach roads to the existing ACA (Base map: DCCDP; Overlay: Southgate)

The plan presents the opportunity to restrict the western residential extension of Blarney to the area of the proposed ACA on the Former Blarney Hotel Site, and thereby omitting further residential zoning to the west of this ACA area. It would enhance the perception of the historic setting when approaching Blarney from the West and help to preserve part of the important views from the Castle, which are under threat from the Monacnapa residential development area.

This would also be consistent with Strategic Archaeology Objective 8.1, providing for the protection and preservation of archaeological monuments, and the key deliverable of a heritage led plan for Blarney and Tower. The DCCDP also proposes in section 7.69, that the economic contribution of tourism is maximised,

"while protecting the invaluable assets that are our natural, built and cultural heritage"

(Volume 1, Chapter 7, page 234).

In combination with the important function of the ACA in terms of Blarney's heritage, it is also the area that must service the accompanying visitor volumes. The infrastructural demands to cater for up to 6,500 coaches per year require careful planning and conflicts with additional residential and large retail development which must be avoided near the ACA.

We therefore submit that residential and retail development in the vicinity and within the ACA must be assessed in terms of traffic impacts on the smooth running of the tourism offering and local connectivity, permeability and amenity value.

Summary:

Objective	ACA designation in Blarney (Map 11 & 18) Development in Architectural Conservation Areas (Objective 8.23)
Comments	<p>We request the inclusion of the historic building of Blarney National School (Scoil Chroí Íosa Blarney) in the enlarged ACA area, as it is an important part of Blarney's heritage and located at a prominent gateway to the village, and the provision of a 15 m buffer zone on the approach roads to the ACA.</p> <p>Development near and within the ACA must have regard to the infrastructural demands of existing coach traffic and conflicts with additional large retail and residential development must be avoided.</p>
Recommended Update	<p>Amend the map to include 15m buffer zones along the approach roads and include Blarney National School within the enlarged ACA.</p> <p>Infrastructural demands on the ACA must be considered in regard to the scale and use of new development.</p>

4.5 Expansion of Blarney Business Park

The DCCDP proposes to extend Blarney Business Park by 22.5 ha, east of the existing Business Park (MD LAP business park zoning BL-B-01). The existing business park and the expansion area are in the eastern viewshed of Blarney Castle and sensitive to the long-range views from the Castle.

We submit that the City Development Plan includes as a core development objective for the Blarney Business Park, that a landscape masterplan is part of the proposed expansion area and that landscape measures and material choices and building heights must be assessed in terms of their contribution towards mitigating the visual impact on views from Blarney Castle.

Summary:

Objective	Objective 7.10a & BL-B-01
Comments	The extension of Blarney Business Park is in the eastern viewshed of Blarney Castle.
Recommended Update	Include additional text to provide for a landscape masterplan as part of the proposed expansion area of the Business Park, where landscape measures, material choices and building heights must be assessed with the explicit aim to mitigate the visual impact of development on views from Blarney Castle.

4.6 Expansion of Light Industry Zoning at Hollyhill

The existing Apple Facility at Hollyhill is located on a prominent hilltop position, in direct line of views from Blarney Castle and demesne. As a result, it affects long distance views from Blarney Castle. The proposed extension of the industrial park north of the existing facility will exacerbate the detrimental visual impact on long range views from BCE, which is part of the ACA and includes protected structures and recorded archaeological monuments, seriously affecting the integrity of the landscape setting, and eroding its special character.

We therefore submit to remove the expansion area to the north of the existing Apple facility of the Hollyhill Industrial Estate, to avoid further encroachment on long-distance views from Blarney Castle.

The proposed expansion west of Hollymount Industrial Estate (north of Blarney Road) requires well landscaped areas as mitigation measures, which would help to prevent the impression of industrial sprawl into the countryside.

Summary:

Objective	Objective 7.10g
Comments	<p>The provision of the Hollyhill Land north of the existing Apple facility for new strategic employment sites will be in the direct line of views from Blarney Castle and demense, seriously affecting the integrity of the landscape setting, and eroding its special character.</p>
Recommended Update	<p>Remove the expansion area to the north of the existing Apple centre of the Hollyhill Industrial Estate, to avoid further encroachment on long-distance views from Blarney Castle.</p> <p>Include additional landscape mitigation measures as part of the western expansion of the new strategic employment sites.</p>

5. Conclusion

Blarney Castle Estate welcome the opportunity to participate in the review of the Draft Cork City Development Plan.

The draft plan envisages exponential growth for Blarney, accommodated by zoning provisions adjacent to the historic village core and BCE. It also provides for an enlarged ACA, which recognises the importance of the historic core area and designates Blarney Castle as a strategic landmark building. We believe that exponential growth on the one hand and preservation of the historic village core, Blarney Castle and Gardens and the surrounding historic landscape on the other hand, are incompatible in the vicinity of the historic core. Cork City Council must recognise this dichotomy and provide measures within the Cork City Development Plan that seek to strengthen and preserve the heritage of Blarney without simultaneously undermining that goal.

In recognition of the role of BCE and Blarney as a visitor attraction of international importance, new development must have regard to the setting and wider landscape, as well as to the townscape and ACA within the vicinity of the Castle. This will benefit the integrity of the cultural heritage, the experiences of visitors and locals alike, and the continued success of Blarney as an international tourism asset.

We therefore submit that the Draft Cork City Development Plan should ensure the following:

- I. Re-zone lands west of the Former Blarney Hotel Site from "ZO 02 New Residential Neighbourhoods" to "ZO 21 City Hinterland" which are within the centreline of views from the Architectural Conservation Area (ACA) and Blarney Castle, affecting negatively the significance and special character of the setting and its intangible cultural heritage.
- II. Re-zone the lands at Monacnapa from "ZO 02 New Residential Neighbourhoods" to "ZO 21 City Hinterland" which are within the centreline of views from the Architectural Conservation Area (ACA) and Blarney Castle, affecting negatively the significance and special character of the setting and its intangible cultural heritage.
Alternatively, provide for "ZO 21 City Hinterland Zoning" above the 72m contour line and provide development parameters for the remainder of the land including adequate offset to the southern boundary and lower density development.
- III. Provide for the protection of mature/historic woodland as part of the "City Hinterland Zoning ZO 21" and as part of "Objective 10.65 Blarney Hinterland". Provide statutory protection for adequate buffers on zoned lands for root zones.
- IV. Blarney Castle be designated as a strategic viewing location in addition to the designation as landmark building and strategic views be identified for key areas.

- V. The expanded area of the ACA should include a 15m buffer zone on the approach roads to the ACA and include Blarney National School, in recognition of its significant architectural contribution at the western gateway to the ACA and its historic link to BCE and Blarney.
- VI. The impact of residential and retail development in the vicinity and within the ACA must be assessed in terms of traffic impacts on the smooth running of the tourism offering and local connectivity, permeability and amenity value.
- VII. The high density housing needed to fulfil the growth strategy for Blarney should be directed and prioritised to the north and east of the historic core where its impact can be managed in line with sustainable development goals and not to the detriment of Blarney's historic core, the viewshed from the Castle and the historic landscape setting of the village.
- VIII. The Blarney Business Park Expansion Area should include as a core objective the provision of an overall landscape master plan and other mitigation measures in terms of material colours and height restrictions in order to mitigate the impact of new development on long range views from Blarney Castle.
- IX. Remove the expansion area to the north of the existing Apple centre of the Hollyhill Industrial Estate, to avoid further encroachment on long-distance views from Blarney Castle. The proposed expansion west of Hollymount Industrial Estate (north of Blarney Road) requires well landscaped areas as mitigation measures.

Further detailed policy objectives are included in the attached report by Southgate Heritage and Conservation Consultants which submit:

- X. Provide a sustainable tourism objective to support the unique setting of the built heritage tourist attractions of Blarney and to safeguard the intangible cultural heritage associated with them, by careful control of new additions or alterations to their immediate and wider setting.
- XI. Provide a historic landscape objective to carefully control the siting, design, materials, use and scale of development where it would be visible from the ACA, to ensure that views and vistas to and from the ACA are respected.
- XII. Provide a development objective to ensure that the character and integrity of the ACA is maintained by recognising that new development adjacent and at a distance from the ACA can affect the ACA's character. The siting, design, material and use of such development should be carefully considered not to have a negative impact.
- XIII. Provide a development objective for public realm improvements within the historic core to ensure that they are designed to enhance and support the historic character.
- XIV. Reduce in size Tier 3 lands on the eastern approach to Blarney's historic core to provide a 15m buffer zone, controlling development in a manner similar to an ACA.

- XV. Include the requirement for development and associated landscaping to be of sympathetic scale, materials, use and design, which is visible from and connects to the ACA, as an addition to Section 1.133.
- XVI. In addition to Section 1.135, recognise that enhancing the historic character and integrity of the ACA should be at the core of larger-scale residential and mixed-use development.

On behalf of Blarney Castle Estate, we thank you for considering this submission to the Cork City Development Plan.

Appendix A

- Report by Forestbird Design: Protection of Historic Woodlands

Enclosure:

- Addendum to Draft Cork City Development Plan submission on Heritage grounds from Southgate Associates Heritage Conservation Architects
- Report from Forestbird Design (Landscape architecture, landscape planning, environmental design): Viewshed and Landscape Character Report.

Appendix A

Report by Forestbird Design: Protection of Historic Woodlands



Submission to Draft Cork City Development Plan On behalf of Blarney Castle Estate

4th October 2021

PROTECTION OF HISTORIC WOODLANDS

Beyond the castle demesne, Blarney Castle Estate (BCE) owns and manages 247 hectares of woodland. These are spread across a number of parcels between Blarney, Tower and the N20. They currently stand as a 50/50 mix between historic broadleaf woods and commercial coniferous plantations. These woodlands are a *significant* contributor to the character and setting of Blarney. They are rich in biodiversity and provide public amenity. As caretaker of the lands, it is our duty to work with Cork City Council to ensure their longevity for the community.

The greatest threat to the health and survival of these woodlands is the expansion of suburban development. Hundreds of trees on the BCE lands date from the 17-1800's. The healthy growth of trees is associated with healthy root zones and soils. In the Draft Development Plan, lands have been zoned residential directly adjacent to historic woodlands. There is no statutory text in the plan to ensure detrimental impact is avoided. The map below illustrates the parcels that are most sensitive to peripheral land use changes.



Figure L1 – Aerial view of sensitive woodlands (outlined in orange) adjacent to zoned land.

Mature trees have extensive and sensitive root zones. Guidance on the protection of same is clearly outlined in BS 5837:2012 (Part 4.6) *Trees in Relation to Design, Demolition and Construction* and the National Roads Authority document *Guidelines for the Protection and Preservation of Trees*, where the Root Protection Area (RPA) is stated as being 12x the diameter of the tree. We recommend that RPA parameters be incorporated into all zoned lands between Blarney and Tower to ensure not only protection of the trees, but also clarity for the developer.



Recommended Text Addition to the Development Plan (Chapter 6 or similar):

Development on zoned lands must take into account the presence of mature trees on adjacent lands and ensure Root Protection Areas are incorporated into any design in accordance with national and EU guidelines for root protection.

The 247 acres of BCE woodland spans both city county, but they have ostensibly the largest landholding of woodland within the Cork City boundary. BCE provides more than 10km of publicly accessible amenity walks through these woodlands, which are managed by 3 fulltime staff (beyond the realm of the demesne). We implore that the local authority acknowledge this stewardship by not allowing external development to negatively impact this amenity due to factors beyond their control.

Kind Regards,

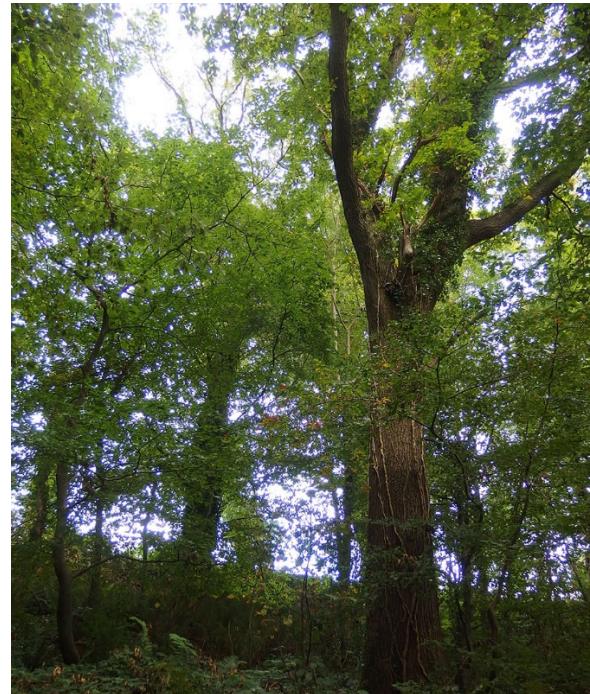
Mike Waldvogel

Principal



IRISH LANDSCAPE INSTITUTE
INSTITIÚID TÍRDHREACHA NA HÉIREANN

Full Member, Irish Landscape Institute (ILI no. P07008)



(left) Image of the outdoor classroom provided by BCE for Blarney National School, within BCE woodland.

(right) Image of the historic woodland adjacent to the Monacnapa zoned lands.