

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

Irish Conference and Leisure Holdings Limited – Site Specific 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 *Z0 02 New Residential Neighbourhoods* zoning designation of the subject lands and assign the *Z0 01 Sustainable Residential Neighbourhoods* zoning objective, acknowledging the lands being brownfield lands which are fully serviced and located immediately adjacent Blarney Town Centre.
3. Remove of the proposed *Z0 07 Urban Town Centre* zoning designation of on the Surface Carpark located to the southeast of the subject lands, and assign the *Z0 15 Public Infrastructure and Utilities* zoning 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.

1.0 INTRODUCTION

The Planning Partnership, The Coach House, Dundanion, Blackrock Road, Cork City, are instructed by **Irish Conference and Leisure Holdings Limited**, Blarney Woollen Mills, Blarney, Cork, 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*, 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.

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

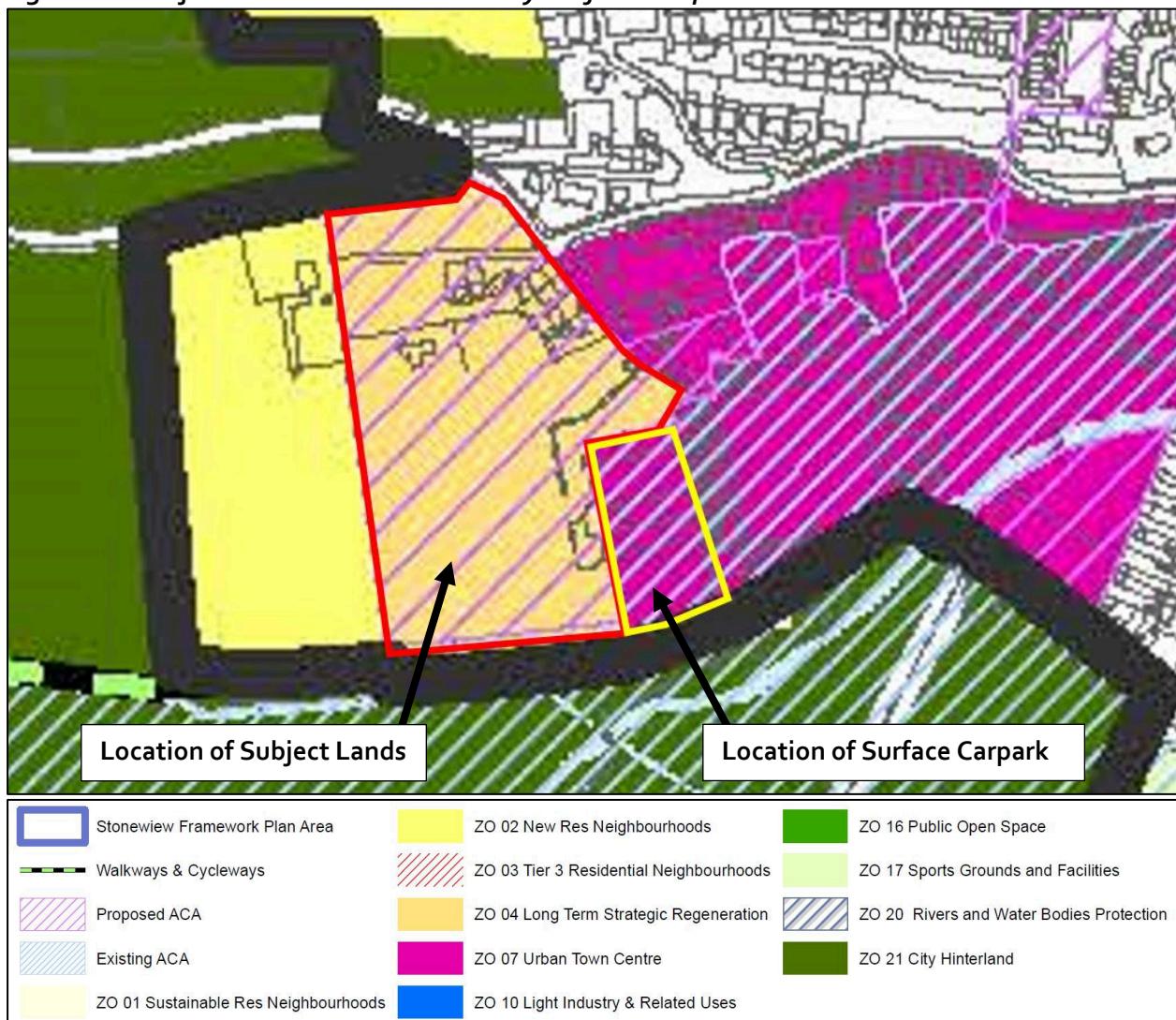
The location and extent of the subject lands, which are in the majority ownership of Irish Conference and Leisure Holdings Limited, and the extensive Surface Carpark, which is in separate ownership, are identified within **Figure 1.1** below.

Figure 1.1: Location of the Subject Lands



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

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 2040

NPO 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

NPO 3b: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

NPO 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.

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 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

RPO 9: *It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including: Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including flood risk management measures, environmental improvement, arts, culture and public realm.*

RPO 35:

- A. *Local Authorities, through Development Plan and Local Area Plan policies, shall identify rejuvenation priorities within our Region's settlements which demonstrate achievement of National Strategic Outcome: Compact Growth;*
- B. *Development Plans shall set out a transitional minimum requirement to deliver at least half (50%) of all new homes that are targeted in the Region's three Cities and suburbs of Cork, Limerick and Waterford, within their existing built up footprints in accordance with NPF National Policy Objective 3b. This will be evidence based on availability and deliverability of lands within the existing built up footprints;*
- C. *Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built-up footprints in accordance with NPF National Policy Objective 3c. This will be evidence based on availability and deliverability of lands within the existing built up footprints.*

RPO 38:

- A. *Local Authorities, through County Development Plan and Local Area Plan objectives, will identify retrofitting initiative priorities within settlements that grew rapidly without corresponding investment in infrastructure and amenities which demonstrate achievement of National Strategic Outcome: Compact Growth;*

- B. *Support initiatives that seek retrofitting infrastructure to existing buildings including smart technologies, energy efficient and micro renewable systems and seek targeted initiatives and actions at a local level for the refurbishment and upgrading of suitable vacant and underused building stock;*
- C. *Support initiatives that retrofit environmental amenities to address adverse effects on biodiversity and the environment;*

Current Blarney Macroom Municipal District Local Area Plan 2017

3.1.2: *In the Cork County Development Plan 2014 Blarney is defined as one of nine "Metropolitan Towns" within the Cork Gateway where the strategic aim is to promote them as critical population growth, service and employment centres within the Cork "Gateway" , providing high levels of community facilities and amenities with infrastructure capacity, high quality and integrated public transport connections, should be the location of choice for most people especially those with an urban employment focus.*

3.2.34: *The scale of growth predicted for Blarney in this Plan will place significant new demands on social and community infrastructure (schools, recreational facilities, healthcare etc.) It is important that new community infrastructure is delivered in a timely fashion as the town grows so that it continues to perform as an attractive convenient town offering a good quality of life.*

3.2.40: *The future development of the town offers opportunities to develop an integrated open space strategy which can perform a number of functions including passive and active amenity areas, wildlife corridors and carbon filters to offset impacts on increased development and traffic within the town. There is a need to identify areas of local biodiversity importance within the plan area so these can form part of the open space network. The area of woodland along the Killowen River Valley should be protected and from part of any future green infrastructure network.*

3.2.50: *Facilitating a modal shift 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 area to the centre. In terms of achieving modal shift in the next plan period, significant weight must be given to encouraging increased levels of walking and cycling in the town, mainly through design and connectivity in new development areas.*

3.2.64: *The area of Blarney town centre and Blarney Castle Estate was designated as an Architectural Conservation Area (ACA) in the County Development Plan 2014. The Blarney ACA includes the key buildings / groups of buildings of architectural, historical and cultural merit and public spaces around them in Blarney Town Centre.*

Table 3.3 Regeneration Area of Blarney - BL RA 01: *The former Blarney Park Hotel site occupies a strategic location on the western edge of Blarney. The hotel was demolished some years ago and all that remains is its footprint. It's proximity to Blarney Castle and the Town Square makes it a sensitive site, where any future development will need to protect and enhance the existing character of the area and views of the Castle. The location, siting and design of any future development on the site will need careful consideration and have to be carried out at high quality architectural design. Such development should have regard to the existing streetscape around the adjoining square and could include an architecturally iconic building. It is*

an objective of the plan to facilitate the mixed-use redevelopment on part of this site zoned as special policy area with residential development on the western portion. Any development should ensure that adequate linkages are provided between the site and the existing town centre.

Figure 2.1: Map of Regeneration Area in Blarney (LAP 2017)



Source: Table 3.3 Regeneration Area in Blarney, *Blarney Macroom Municipal District Local Area Plan 2017*, extracted and reproduced by The Planning Partnership under OS Licence No. AR0114721

Cork City Draft Development Plan 2022 - 2028

3.6: *The National Planning Framework, RSES and the Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities (DEHLG, 2009) all place great value on the development of sustainable neighbourhoods. In order to have a good quality of life people need access to a range of resources in addition to their home: The resources that we need to function as a society can be considered at three different scales for the purposes of Cork City's planning strategy:*

- A strategic City-wide scale;
- A City-quadrant / Urban Town scale; and
- A Neighbourhood / 15-Minute City scale.

3.7: *The "15-Minute City" provides a very clear concept to frame what we mean by neighbourhoods. This concept has been given much greater significance during the Covid-19 global public health crisis and has become part of the mainstream lexicon and raised society's expectations as to what they can expect within their own neighbourhood. The concept has been part of Cork City Council's planning policy framework since 2010.*

3.8: A key premise of the 15-Minute City is that people should be able to walk and cycle to access the resources and facilities within their 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 Cork's citizens. Within 15 Minutes of people's home, they should have access 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).

3.9: The Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual – A Best Practice Guide provide the relevant s28 Guidelines and planning tools to achieve the 15-minute City.

8.33: It is important to recognise that historic urban areas and designed landscapes are not to be preserved. Alterations and extensions to existing structures, the redevelopment of redundant sites and the intensification of uses will occur responding to economic and social changes as the city evolves.

8.34: The designation of such areas as Architectural Conservation Areas seeks to protect the exiting qualities as part of the evolving development process and to ensure that new development responds to the historic environment in a way that contributes new values from our own time.

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:

- groups of structures of distinctiveness or visual richness or historical importance;
- the setting and exterior appearance of structures that are of special interest, but the interiors of which do not merit protection;
- the setting of a protected structure where this is more extensive than its curtilage;
- 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;
- 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 recommended to include the Subject Lands due to the setting of Blarney Castle, it is noted that such designation is restricted to the extent of land ownership in the name of Irish Conference and Leisure Holdings Limited, and does not extend to neighbouring lands to the west of the subject lands, or the Northern Residential Suburbs, or the northern surrounding elevated lands, all which are in full visual view of Blarney Castle as confirmed by Map 06 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, appears that the additional ACA designation is restricted to the land extent in the ownership of Irish Conference and Leisure Holdings Limited, 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.

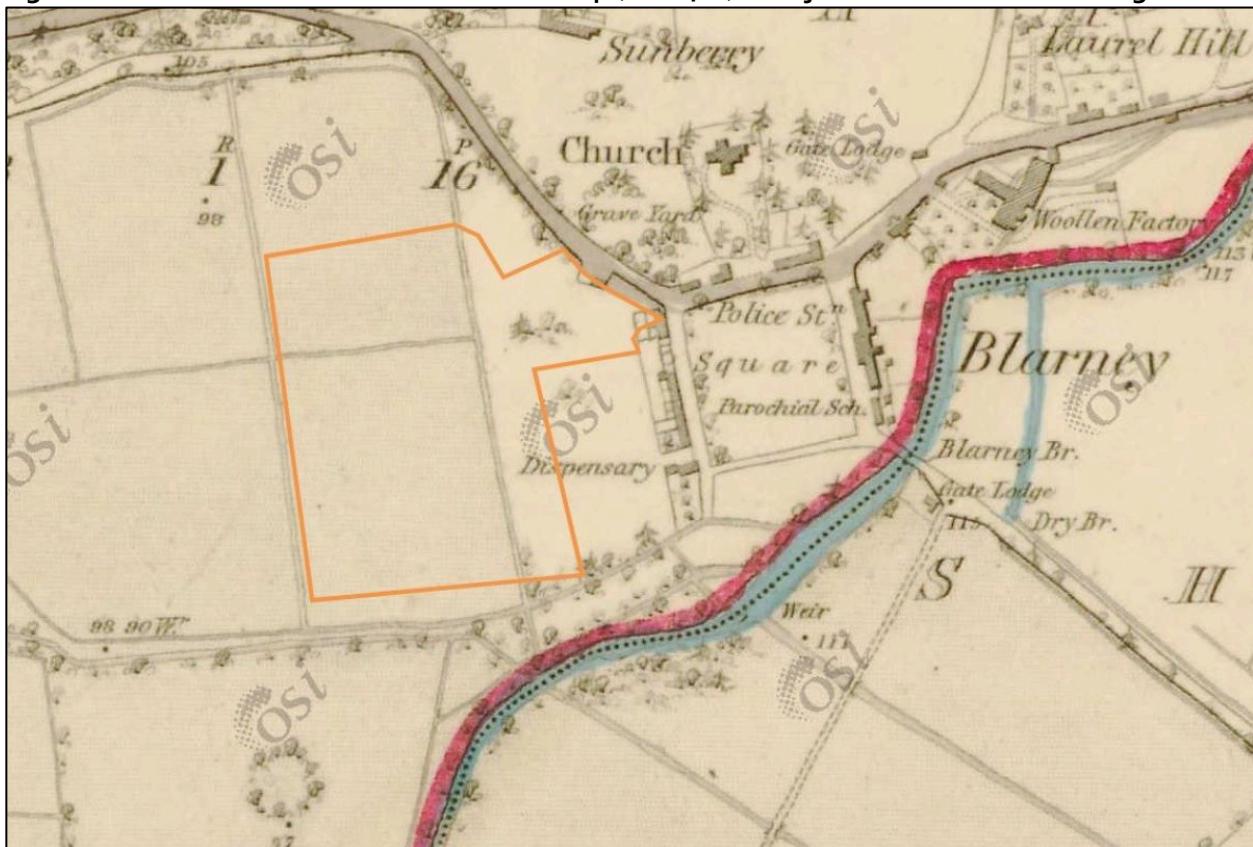
In developing the vacant brownfield subject lands which is in the ownership of Irish Conference and Leisure Holdings Limited and now proposed to be designated ACA, development proposals will not give rise to a significant change to elements, parcels or components of the estate itself and no change to the amenity or community/tourism value of the estate will occur when 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.

The development of the Irish Conference and Leisure Holdings Limited 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.

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

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.

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.

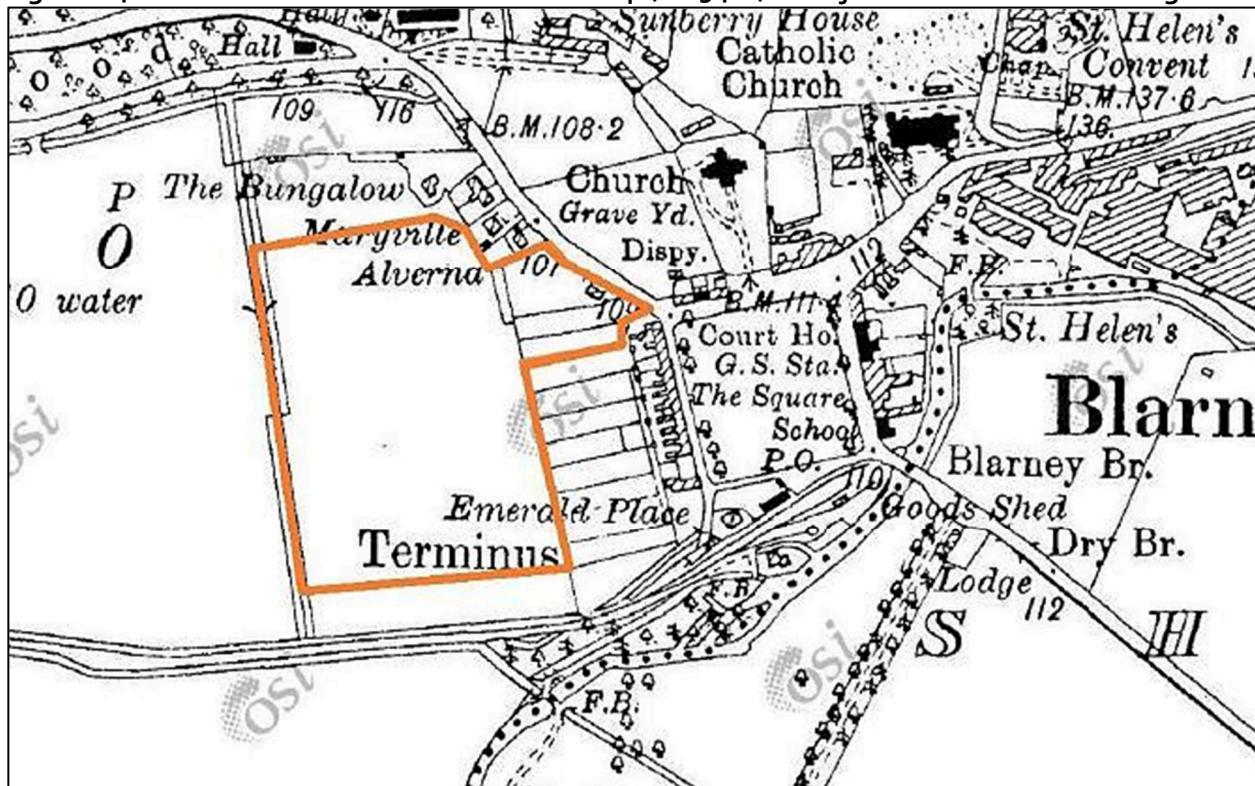
In terms of indirect impacts on built heritage, there is likely to be very slight visual impacts on two protected structures should the brownfield subject lands be developed, namely Blarney Castle (Protected Structure Number 00382) and the Church of Ireland church (Protected Structure Number 00382).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

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

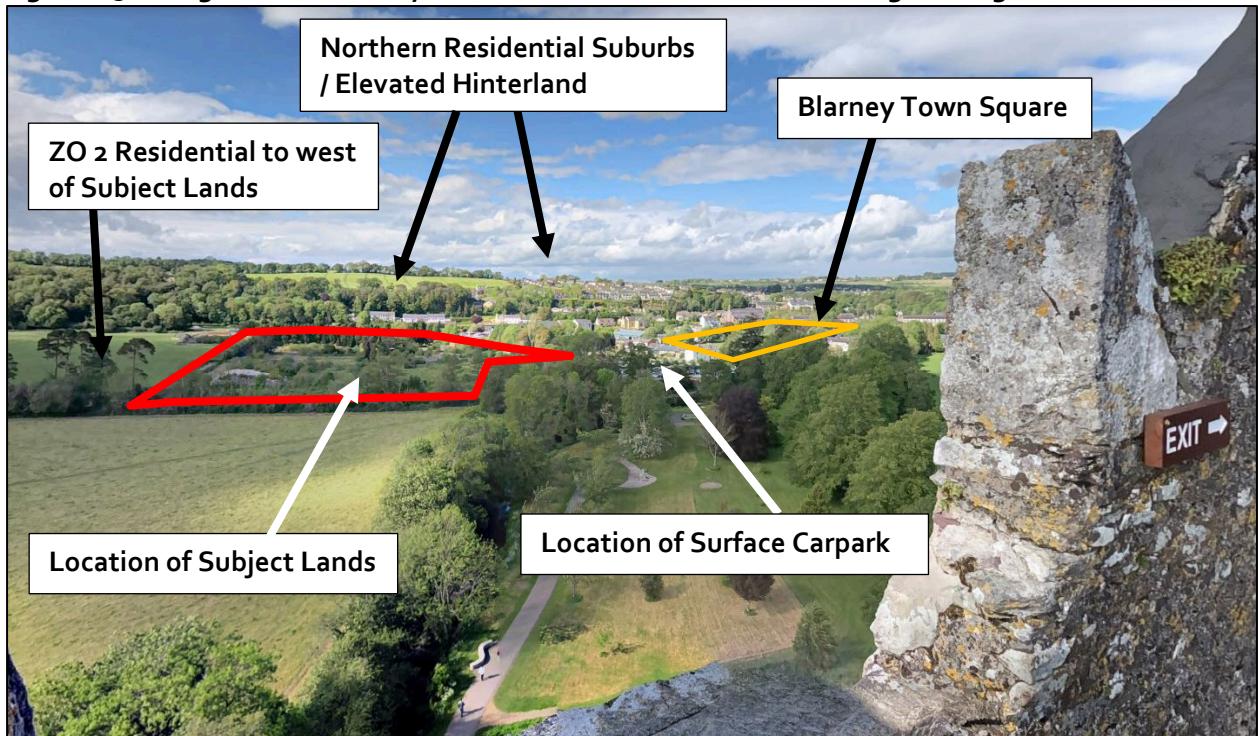
Figure 2.4: Extract from the Cassini edition OS map (c. 1940s) – subject lands outlined in orange



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

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, September 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* designation would not be inconsistent with the Proper Planning and Sustainable Development of Blarney.

The central principle of the Irish Planning System is that permission is required in respect of the development of land, and certain types of minor development given exemption from the obligation to obtain planning permission.

Exempted development rights arise from different parts of the *Planning and Development Act 2000* (as amended), i.e. s.4(1) specific exemptions (incl. works to maintain, improve or alter a building), s.4(2) classes of exempted development by regulations made by the Minister, and s.181 regulations by the Minister which excludes specified classes of development by State authorities (mainly security considerations).

By designating an area as Architectural Conservation Area, exempted development rights are restricted and exemptions contained in s.4(1), and those in the *Planning and Development Regulations 2001* (as amended) do not apply if the works involved would materially affect the character of the Architectural Conservation Area in question. When considering applications and

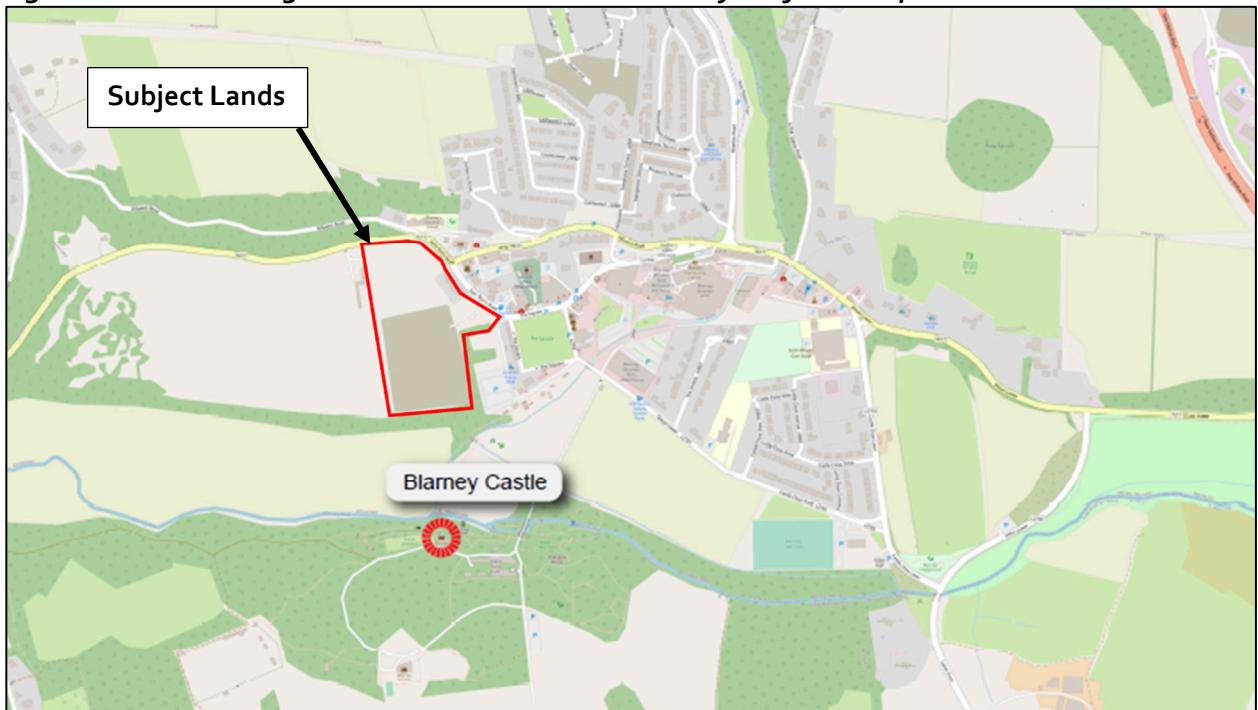
appeals, Cork City Council and An Bord Pleanála must take into account any material effects the proposed development would be likely to have on the character of the Architectural Conservation Area in question.

By designating the vacant brownfield subject lands as Architectural Conservation Area, will result in complications and challenges when having the assess the impact on the character of the Architectural Conservation Area in question as there are no key buildings / groups of buildings of Architectural, Historical or Cultural merit within the immediate location of the subject lands.

View Management Framework

Cork City offers a visually striking landscape that combines urban settlements with rivers, ridges, spaces, streets, rural hinterland and buildings.

Figure 2.6: View Management Framework within Cork City Draft Development Plan 2022 – 2028



Source: Cork City Draft Development Plan 2022-2028 View Management Framework – Map 06 – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

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 2.7 below, the subject site is within 500 metres of the town centre and 1 km to the existing residential neighbourhoods.

Figure 2.7: 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 **Removing the proposed *ZO 07 Urban Town Centre* zoning designation of on the Surface Carpark located to the southeast of the subject lands, and assign *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 *Cork City Draft Development Plan 2022 – 2028* acknowledges Blarney as one of Ireland's most important tourist centres with a range of associated tourist facilities such as Blarney Castle and Blarney Woollen Mills. It is important therefore that future development initiatives within the vicinity of the Castle do not compromise the tourism potential of the town and actively seek to enhance this important sector of the local economy.

To this extent, the proposed *ZO 07 Urban Town Centre* zoning designation of on the Surface Carpark located to the southeast of the subject lands would be considered contrary to the overall protection of the tourism potential of the town by facilitating the removal of key parking facilities to serve the overall tourism offer of Blarney, and promoting the subsequent development of the Surface Carpark for Town Centre uses.

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for *Urban Town Centre* land use zoning are:

ZO 7 Urban Town Centre:

To consolidate and provide for the development and enhancement of urban town centres as primary locations for mixed use retail, economic and residential growth which also act as a focus for a range of services.

ZO 7.1: *This zone applies to the central areas of the major urban towns of Ballincollig, Blarney and Glanmire. These areas each have distinct characters and cultures and*

have great potential to contribute to the sustainable compact growth of Cork City. Chapter 7 Economy and Employment sets out further objectives for Urban Town Centres.

ZO 7.2: The primary purpose of this zone is to consolidate and develop the existing urban town centre areas as primary locations for retail, economic, residential, cultural, community, leisure, civic and other related uses. The primary retail areas will form the main focus and preferred location for new retail development, appropriate to the scale and function of each centre. Residential development will be encouraged particularly in mixed use developments.

ZO 7.3: Development proposals in this zone must demonstrate how the proposal would respect, reflect or contribute to the character and vibrancy of the particular urban town centre, commensurate with the nature and scale of the development. Developments must deliver a quality urban environment and public realm with a focus on accessibility and permeability.

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for Public Infrastructure and Utilities land use zoning are:

ZO 15 Public Infrastructure and Utilities:

To provide for public infrastructure and utilities.

ZO 15.1: This zone covers the provision of public and utilities infrastructure, which can include park and ride facilities, and various other transport, water, drainage, emergency services, electricity, gas, telecommunications, maintenance purposes and other utility facilities.

ZO 15.2: Development in this zone should have regard to its receiving environment and should seek to integrate to its surroundings through boundary treatment and landscaping solutions.

Having regard to the foregoing and noting that subject lands current use as Surface Carpark providing key parking facilities to serve the overall tourism offer of Blarney, it is therefore contended that the proposed zoning of the Surface Carpark lands as ZO 07 Urban Town Centre zoning is inconsistent with the current established use of the lands, and the removal of the ZO 07 Urban Town Centre zoning would not be inconsistent with the Proper Planning and Sustainable Development of Blarney.

It is therefore requested that the subject lands be zoned ZO 15 Public Infrastructure and Utilities which more appropriately reflects the current Surface Carpark use providing key parking facilities to serve the overall tourism offer of Blarney, thereby facilitating the Proper Planning and Sustainable Development of Blarney during the life span of the *Cork City Draft Development Plan 2022 – 2028*.

4.0 CONCLUSION

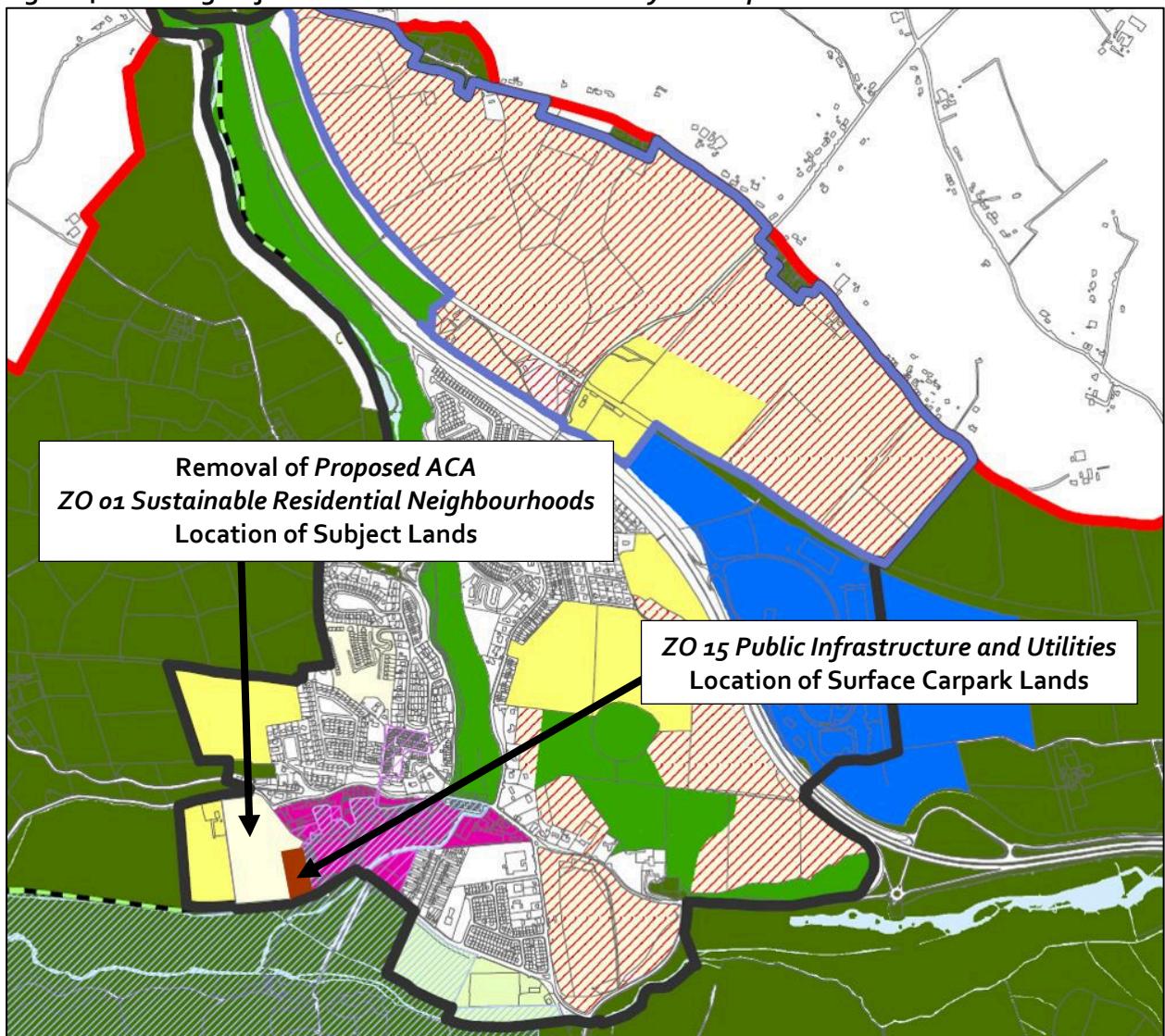
In summary, we request the:

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*, 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.

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. AR014721

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.

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