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Cork City Council
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04 October 2021

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**Re: Submission to Draft Cork City Development Plan 2022 – 2028
Blarney Town Centre & Proposed ZO 4 Long -Term Strategic Regeneration Objective.**

Dear Sir/ Madam

This submission has been prepared on behalf of JAW Asset Holdings Limited of Penrose Wharf, Penrose Quay, Cork, in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 -2028 (Draft DP). This submission is specifically in response to the Council's draft zoning objectives for the Blarney consisting of the proposed ZO 4 Long -Term Strategic Regeneration Objective and extension of the ACA identified for our clients lands in particular.

SITE & CONTEXT

Our clients are the owners of approximately 1.02 ha of land which is located at the western extent of Blarney on lands designated as both a Special Policy Area (BL-X-01) and an area of regeneration (BL-RA-01) in the Blarney Macroom Municipal District Local Area Plan (LAP). The lands are located just to the north of the site of the former Blarney Park Hotel. Land uses in the vicinity of the site include Blarney Primary School (Scoil Croi Iosa), the Blarney Medical Centre and various town centre retail / services along St. Ann's Road. There are also a number of residential dwellings along St. Ann's Road near the proposed entrance to the site.

In August 2020 JAW Asset Holdings Limited submitted an application to Cork City Council for the demolition of an existing dwelling and the construction of a 3-storey building with a Primary Care Centre at first and second floor levels, with 5 no. retail units at ground floor level, as well as a separate café on the site of the existing dwelling, 20/39502 refers. The proposal made provision upgrades to the junction with the R617 to provide a 4 arm roundabout, the detail of which was agreed with Cork City Council prior to the submission of the application. The access arrangements to the proposed development are intended as a short term measure in advance of the eventual re-alignment of the R617 as envisaged in the Local Area Plan, requiring the development of lands to the west of the applicant's landholding. The planning application site is outlined in red on the Figure 1.1 below.

The application was refused by Cork City Council in October 2020 for multiple reasons. The applicants appealed this decision to An Bord Pleanála and a decision is pending, ABP-308670-20 refers



Figure 1.1 20/39502 Application Site

At present the subject site forms part of the wider BL-X-01 Special Policy Area. This Special Policy Area comprises lands associated with the former Blarney Park Hotel as well as additional landholdings. The City Council will note that while our client's landholding is included in this Special Policy Area, the proposed development lands did not in fact form part of the former hotel site and have historically been under separate ownership. This ownership is illustrated in the extract below from the Landdirect website (Figure 1.2). The applicant's lands are highlighted in pink while the former Hotel site is shown in grey.

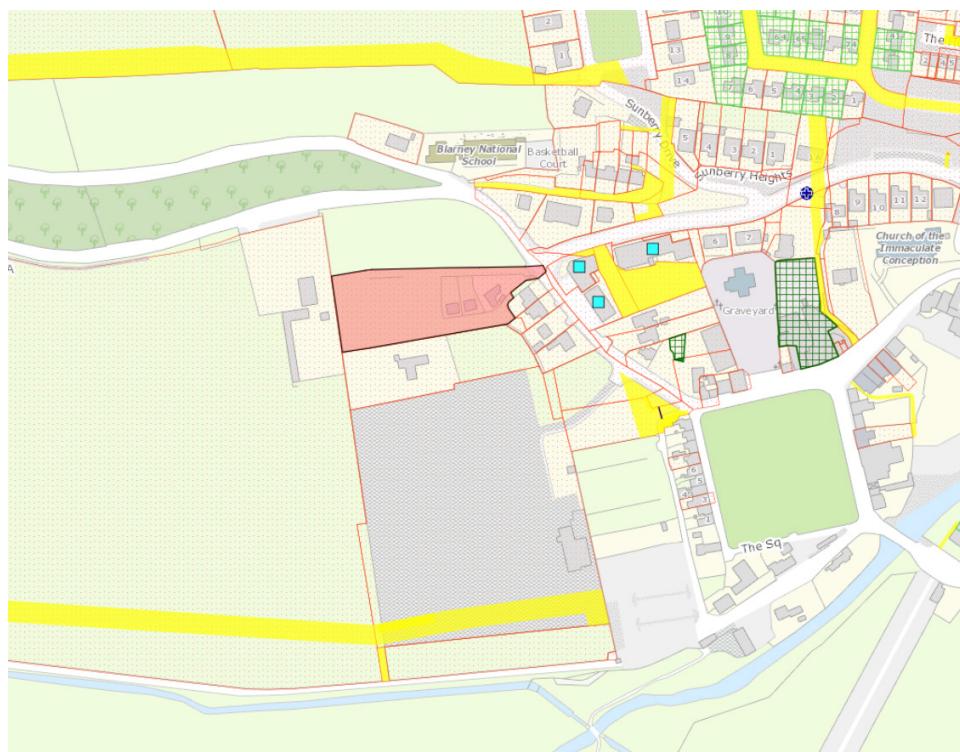


Figure 1.2 Landownership

2021 DRAFT CORK CITY DEVELOPMENT PLAN

Notwithstanding the demonstration that there are no infrastructural impediments, just benefits to the development of the subject lands, it has been included with an area afforded a *ZO 04 Long Term Regeneration*. We note that this objective has been developed primarily for the redevelopment of Tivoli and don't consider its appropriate for the subject site.

In addition the existing Blarney Castle ACA is proposed to be extended to include the subject site, which we consider is inappropriate given the distance that the subject site is from the Blarney Castle Estate and the lack of visual or physical connection between them.



Figure 1.3 2021 Draft Cork City Development Plan

REQUEST

Having regard to landownership and the fact that the proposed development site does not present any strategic issues to be resolved, we consider that the proposed *ZO 04 Long Term Regeneration* is inappropriate. The ZO 07 Urban Town Centre objective would more accurately reflect the characteristics of the subject lands, the fact that it can be developed in the short term and its future development potential. As part of the school grounds to the north formed part of the pending application and given that the ZO 07 objective would support the future expansion of educational and other uses, we consider that this would be the most appropriate zoning objective for these lands also.

Given the lack of physical or visual connections to Blarney Castle Estate the extension of the Blarney Castle ACA to include the subject site is unwarranted and contrary to the provisions of the *Architectural Heritage Protection – Guidelines for Planning Authorities*. We request that the same be removed from the subject lands.



Figure 1.4 Proposed Zoning Objective

RATIONALE

Having reviewed the 2021 Draft City Plan zoning objectives, we consider that the

- Proposed ZO 04 zoning objective is inappropriate;
- Proposed extension to the ACA is unwarranted; and

- Both objectives will delay infrastructural upgrades.

These issues are dealt in greater detail below

Proposed ZO 04 Zoning Objective is Inappropriate

As highlighted above the lands in the ownership of our clients are separate and distinct from the former Blarney Park Hotel lands and are located at the northern portion of the existing BL-X-01 Special Policy Area. As demonstrated in the pending planning application the subject lands are smaller and more discrete with no strategic issues to be resolved. The City Council will note that the development of the subject lands have made provision for the future development on the Blarney Park Hotel lands and can be delivered without restricting or impacting on the development of those lands.

The inclusion of the subject lands within a strategic regeneration objective does not accurately reflect the characteristics of the site and that is a town centre expansion site, which can be delivered in the short term. The inclusion of the lands within a wider strategic objective will only seek to delay the appropriate redevelopment of the site.

Proposed Extension of ACA is Unwarranted

It is unclear from the Draft City Plan what justification or assessment was provided to extending the existing Blarney Castle ACA beyond its existing boundaries onto lands to the north and the subject site in particular. These lands have historically been detached from the Estate and have no visual or physical connection to it. In terms of defining the boundaries of a candidate ACA, Section 3.2.5 of the *Architectural Heritage Protection – Guidelines for Planning Authorities* specify the following

The boundaries of a candidate ACA should make physical, visual and planning-control sense. It may be necessary to refer back to the core characteristics of the area in order to establish the most appropriate boundary lines. The choice of boundary may be influenced by considering the importance of the various views into and out of the area, but it is not necessary to include all territory encompassed by such views. The character of the edges of the area may gradually degenerate in some parts due to dereliction. Whether or not degraded parts should be included may be resolved by reference to the historical research to see if these areas once formed a coherent part of the overall place.

The City Council will be aware of a proposed Strategic Housing Development (SHD) on lands at Monacnappa to the North of the subject site (ABP 308156). These lands, due to their elevated nature arguably present a stronger visual link to the castle than the lands that are the subject of this appeal. The applicants on this scheme have provided a comprehensive set of photomontages and Landscape Visual Impact Assessment (LVIA) which assesses the impact of the proposed development from a number of viewpoints, including from the top of the castle (Figure 1.5 below). We consider that the visual assessment included with the SHD demonstrates the extent of existing modern developments that are viewable from the castle as well as the evolving context of the area. The City Council will note the brownfield lands of the former Blarney Park hotel in the foreground. Our client's lands are located in the middle ground of this image beyond a line of extensive mature vegetation with the primary school to the north providing additional context.



Figure 1.5 Photomontage taken from SHD Application ABP 308156 – subject lands in middle ground

We consider the optimum vantage points for views of Blarney Castle to be located along various stretches of the R617 between Tower and Blarney. The development of the subject land would not in any way impede the enjoyment of these views. Moreover, the availability of close range views to the castle along the stretch of the R617 immediately to the north of the subject lands are limited by the extensive vegetation visible in Figure 1.3 above.

It is unclear from the Draft Development Plan what the justification for the extension of the ACA above we consider that the proposed development site has the capacity to accommodate the proposed development without having a negative impact on the cultural heritage of Blarney. In addition we consider that the proposed extension of the ACA to encompass the subject lands is contrary to the *Architectural Heritage Protection – Guidelines for Planning Authorities*.

Delivery of Infrastructural Improvements

As outlined in detail in the pending planning application the development of the subject lands will complement and be supported by the objectives of the Cork Metropolitan Area Transport Strategy (CMATS) through the introduction of a mixed use development to the centre of Blarney that can be accessed by sustainable means of travel. As outlined in CMATS, Blarney will benefit from future transport improvements, including the reinstatement of the former railway station to provide commuter services to the City and Mallow and an increased frequency of bus services linking to the City Centre and nearby settlements such as Tower.

The BL-X-01 zoning objective and the Regeneration Area objective BL RA 01 highlights the ambition for improved access to the subject site and for improved connectivity with the town centre with a requirement for:

- Pedestrian and cycleway linkages to adjoining BL-R-18 zoned site to the west and the town centre to the east.
- Realignment of the R617.

The Proposed junction upgrades that accompanies the proposed development are consistent with the X-01 objective of re-aligning the R617 and will provide for a more coherent junction at this entrance to Blarney. The proposed road to the north of the proposed Primary Care Centre will contribute to the Local Area Plan objective of realigning the R617 and providing an enhanced vehicular access into Blarney from the west.

It is also a mandatory requirement that all new roads and streets are designed in accordance with the *Design Manual for Urban Streets* (DMURS). MHL Consulting Engineers prepared a comprehensive design response for the realignment of the R617 including traffic calming and pedestrian /cyclist crossing points. Proposals for the realignment of the R617 have been agreed in principle with the Traffic and Transportation Section of Cork County Council as have the required interim solution of the partial completion of the road along the extent of the applicant's existing landownership. The proposed roundabout has been agreed as the optimum approach pending the delivery of the final realigned road which will continue through the neighbouring zoned lands to the west of the subject site and complete the R617 realignment

CONCLUSION

In summary we wish to highlight the following

- Having regard to landownership and the fact that the proposed development site does not present any strategic issues to be resolved, we consider that the proposed *ZO 04 Long Term Regeneration* is inappropriate.
- The ZO 07 Urban Town Centre objective would more accurately reflect the characteristics of the subject lands, the fact that it can be developed in the short term and its future development potential
- It is unclear from the Draft City Plan what justification or assessment was provided to extending the existing Blarney Castle ACA beyond its existing boundaries onto lands to the north and the subject site in particular. These lands have historically been detached from the Estate and have no visual or physical connection to it.
- The subject site has the capacity to deliver infrastructural upgrades, which will be unnecessarily delayed if the lands are afforded strategic zoning objective.



Please do not hesitate to contact us if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read "Harry Walsh".

Harry Walsh
HW Planning