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Co. Cork.

The Planning Department,
Cork County Council,
County Hall,
Cork.

27th January, 2017.

RE: Planning Ref. 16/7137 – Lidl Ireland GmbH

Dear Sir/Madam,

I wish to represent the concern expressed to me by both residents and users of Douglas village about several aspects of the above planning application.

• Impact of the proposed development on existing convenience outlets

The planning application describes the commercial core of Douglas as being “highly vibrant featuring a healthy diversity of uses”. Unfortunately, this is not the case. Both the *Metropolitan Cork Joint Retail Study* commissioned by Cork County Council in 2013 and the Douglas LUTS, also undertaken for Cork County Council, speak of vacancy in Douglas village. Both describe the need to improve vibrancy within the village centre. Both indicate the high levels of convenience outlets already available within Douglas village. Douglas LUTS mentions how provision of office floorspace in Douglas might increase daytime vibrancy. The Carrigaline Electoral Area Local Area Plan (2011) clearly envisages the same benefits of mixed use developments, encouraging same in paragraphs 2.3.7, 2.3.8 and echoed again in the first draft of the Local Area Plan update (paragraph 3.5.48). Douglas LUTS specifically recommends a mixed use development at the Barry’s Field site. Costs of shopping are very high and a discount store is always of benefit, particularly to families. But there is a concern that a single convenience use of this very valuable opportunity site would make existing convenience outlets suffer and, in consequence, actually decrease rather than contribute to commercial vibrancy.

Paragraph 7.7.3 of the Cork County Development Plan 2014 defines policy with regard to convenience floorspace in Metropolitan Cork as being in accordance with planned population growth. Considering the impact which the proposed development might have on existing convenience outlets in Douglas village, it is reasonable to suggest that the analysis laid out in Paragraph 7.7.2 of the County Development Plan would be required by the applicant to assist analyse the benefits or otherwise of bringing another significant convenience outlet into the centre of Douglas village.

In this regard, it would be helpful that the applicant would advise on the balance between the convenience and comparison elements of the proposed development. The Retail Planning Guidelines advise that this is a “critical element” in the assessment of the suitability of the development proposal.

- **Impact of the proposed development on traffic in Douglas village**

Discount stores so often establish on the edges of towns. We have seen planning permission granted to convenience centres in such locations, contributing to significant subsequent decline in the adjacent town centre. For this reason, the Retail Planning Guidelines recommend that town centre locations should, where possible, be favoured for large retail outlets such as that proposed. This proposal responds to that recommendation.

However, Paragraph 4.11.1 of the Guidelines cautions that if a road network does not have the capacity to accommodate additional traffic and service vehicles, it may not always be possible to advance significant retail outlets in town centre locations. Traffic congestion in Douglas has long been an issue, mentioned specifically both in the Carrigaline Electoral Area Local Area Plan (Paragraph 2.2.20) and in the current draft of the Ballincollig-Carrigaline Municipal District Local Area Plan (Paragraph 3.5.49). Cork County Council commissioned the Douglas LUTS with the specific aim of increasing the sustainability of traffic movement within and around Douglas village centre.

The Douglas LUTS recommended a shift in presentation of Douglas Village East, incorporating a streetscape designed for pedestrians and favouring public transport. It suggested making East Douglas Street a public transport only corridor during the daytime. Whilst some of the suggestions are clearly still quite some way from implementation, the ethos of the Study is what is critical. Cork County Council’s recent traffic calming on the Old Carrigaline Road is reflective of that. The aim was to slow traffic entering the village and whilst the planning application for this development comments on the absence of cycle lanes, the aim of this traffic calming was to make Old Carrigaline Road a safer shared surface.

By their nature, larger families generally use discount convenience stores for larger shopping. It is essential to bring the car to carry the shopping home. There is significant concern that the proposed development would attract additional car traffic into Douglas village. In addition, discount stores are served by long articulated delivery trucks. The turn, particularly of articulated trucks, onto Old Carrigaline Road from the R609 across fast-moving traffic has the potential to be quite hazardous. Old Carrigaline Road is one-way, so all vehicles leaving the proposed discount store would have to join East Douglas Street and either go through the congested village centre, turn left down the residential Church Street or make a difficult turn onto Tramway Terrace.

The traffic report submitted with the planning application does not evaluate all of these issues and so fails to respond to local concerns in this regard.

- **Public realm concerns**

Improving public realm and connectivity between the shopping centres is a key aim of Douglas LUTS. The planning application accompanying this development speaks of the new pedestrian linkages and civic space it is providing. I had assumed this suggested a park or even parklet element within the development and accompanying landscaped footpath from Old Carrigaline Road to Churchyard Lane. But I cannot see any evidence of this kind of approach on the drawings included. It seems to me that the only pedestrian linkage proposed is through a car park and I cannot see that any civic space is proposed at all. This is

indeed a long way from the aim for the Barry's Field site which suggests its development as public open space in the town centre, connecting to the existing park, linking other open spaces and enhancing the biodiversity potential of the area.

- **Impact on the Church Street Architectural Conservation Area**

Douglas is a historic village. This is captured by designation of some of its key streets in an Architectural Conservation Area. This identity is very important to many of the residents. The Architectural Conservation Areas can be an advantage to Douglas, not a disadvantage. Their careful management and enhancement can contribute massively to the presentation, attractiveness and character of the village centre.

Three of the four sides of the site of the proposed development border an Architectural Conservation Area. It is therefore absolutely critical and only fair that photomontages which accurately indicate what the proposal would look like in those three streetscapes would be included with the planning application.

From its description and limited drawings, the development proposal appears to be sensitive to the Churchyard Lane streetscape. It proposes the retention and reinforcing of the existing ditch which one hopes would visually shield the car parking area.

The potential impact on the Old Carrigaline Road is not equally positive. It is true that existing architectural styles on the Old Carrigaline Road are haphazard and the development line is poor. Probably the most valuable function of the Old Carrigaline Road in the context of the Architectural Conservation Area is as an entrance. In turn, the strongest feature of this entrance is the traditional stone wall and hedge which this development proposes to remove. It is fair that if vehicular access to Barry's Field is to be provided, this stone wall would be affected. But what would be very helpful would be a full and accurate description of that which would replace this valuable site boundary. In this context, the planning application is quite inadequate.

The planning application mentions a "low wall feature punctuated by trees". How low is a low wall? Would the wall line break for the trees? What material would the wall be constructed of? Would the traditional stone be conserved with which to rebuild the new site boundary? The presentation of the store on the Old Carrigaline Road is as large glazed units which the application claims will deliver an "open and active street façade". What colour is the glazing? If the glass proposed is tinted or not visually permeable, it would not make the street façade open or active at all.

The proposal could be visually advantageous if it were to enhance the entrance to the Church Street Architectural Conservation Area but without these sort of details, it is simply not possible to adequately evaluate its impact.

- **Conclusion**

Barry's Field is a key site and the last undeveloped green space in the centre of Douglas village. This proposed discount store could be a very positive development. Equally, it could be a very negative development, exacerbating all of the existing challenges within Douglas village centre. It is difficult to assuage concerns expressed to me about the potentially negative aspects of those impacts without the further information outlined above which would enable a fuller assessment.

I should therefore appreciate if the above-requested information would be considered before a decision is taken on the proposed development.


Please find enclosed the relevant submission fee of €20.

With regards,

A handwritten signature in cursive script, appearing to read "Marcia D'Alton", is written over a horizontal line.

Marcia D'Alton

Independent Member, Cork County Council.

A large, sweeping handwritten flourish or scribble is located below the typed name and title.