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22 Hillcrest,
Pembroke Wood,
Passage West,
Co. Cork.

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

12th April, 2018.

RE: ABP-301328-18

Modifications to the existing retail development

The former Eurospar Supermarket, Pembroke, Passage West, Co. Cork.

Dear Sir/Madam,

I have been a resident of Passage West/Monkstown for over 20 years. I represented the people of my town as an elected member of Passage West Town Council for 10 years. In 2014, I was elected to Cork County Council. Since Aldi purchased the former Eurospar supermarket in Passage West, I can solidly vouch for its opening as being one of the most eagerly anticipated developments in our town for many years.

Eurospar was more than just a supermarket in our community. It provided employment, it was a social outing, a meeting place, a destination. National economic fortunes being what they were in the late 2000s, it was taken over by a receiver and closed in March 2017. Aldi's purchase of the vacant supermarket building was greeted with universal whoops of joy. As a community, we watched every step of Aldi's planning application, wishing we could expedite it through the statutory process. With its various modifications receiving the seal of approval from Cork County Council, we began counting the months until life and vibrancy would once again return to our only supermarket.

Collectively, the Passage West community is horrified that the planning application for what are merely simple modifications to the existing supermarket has been appealed to An Bord Pleanála. We are disbelieving that anybody who might ever come to Passage West could be thus blind to the dire shortage of retail in our town. We are angry that delivery of such a badly needed service in our town could be delayed or threatened by a third party who does not live in Passage West and who therefore does not experience that which residents of Passage West experience on a daily basis.

Passage West and Monkstown are two sister towns lying between the busy suburb of Douglas and the thriving town of Carrigaline. Their picturesque waterside location dominates their history. Passage West was once a thriving port where, throughout the 19th century, hundreds of workers were employed in what was one of the most progressive dockyards in Europe. When shipbuilding ceased in 1931, Passage West was left reeling. Generations have been affected at the loss of what was truly one of the first industries in Cork Harbour. Although the dockyard still occupies a dominant position in the town centre, its presence has long since stunted the town's potential.

The settlement of Passage West/Monkstown was designated a satellite town of Cork City in the 1996 Cork County Development Plan. Between 1996 and 2006, the population almost doubled. Most of the residential growth targets were met by housing estates, the largest of which are at the eastern end of Passage West. With the water on one side and steep topography on the other, the town is long, linear and narrow. Opportunities to locate facilities centrally are limited.

The loss of industry has taken its toll and dereliction is evident in Passage West town centre. Cork County Council first recognised the dockyard as an opportunity site in the 1996 Cork County Development Plan. It was one of several sites designated for tax-designated urban renewal status by S.I. 240 of 2002. Despite these incentives for its development, the dockyard is still used for import-export and continues to be recognised in the Cork County Development Plan 2014 as an opportunity site. In this same period the population of Passage West almost doubled while in the face of an increasingly unattractive town centre unable to compete with Douglas and Carrigaline, services declined.

From 2008, a supermarket operated out of the building which is the subject of this planning application. It was one of the very few vibrant retail services in Passage West.

The modifications to the existing supermarket building proposed in Aldi's current planning application are straightforward. They are simply to facilitate the supermarket's presentation in accordance with the usual Aldi model and to right some historical non-compliances. The third-party appeal has been taken on three grounds:

1. Inappropriate edge of town development.
2. Transportation and traffic issues
3. Inappropriate design

1. Inappropriate edge of town development

The appellant contends that the proposed Aldi store is an edge-of-town development, far removed from the town core and, as such, its location contravenes a whole suite of development plans and fails to contribute to improving the town centre environment.

This supermarket building was granted planning permission in 2003 as part of a larger retail development (CCC ref. 03/4463). It is extraordinary that Section 4 of the appeal relating to the site's planning history mentions only the most recent planning permission for the site (15/6040), dismissing the parent planning application as being one of a "number" of other planning applications granted "in relation to an ESB substation and alterations to the car showroom".

The supermarket operated as a Eurospar from 2008 until 2017. Section 3.2 of the appeal describes Aldi's planning application as being for a "mono-use convenience retail outlet". This is not true. The Aldi planning application is not for a new retail store. It is for modifications to an existing store. Therefore this grounds of appeal is not relevant to the current planning application. The assessment as to whether or not the location of the supermarket is appropriate in the context of the various statutory plans was undertaken as part of the parent planning application in 2003.

Despite its irrelevance to the Aldi planning application, the appellant's assessment supporting his argument in favour of the unsuitability of the store's location does such an injustice to our town that it simply must be addressed.

• Inaccuracies and misrepresentations

Section 3.1 mentions the 2011 Census indicating a population of 5,790 in Passage West. This is not the current population. The most recent Census was done in 2016 and indicates that Passage West has a population of 5,843.

The appeal oscillates between calling Passage West a “small rural” town (Section 1) and a “metropolitan” town. Retail policies for both are different. The Ballincollig Carrigaline Municipal District Local Area Plan (2017) makes it clear:

“The location of the settlement in the heart of the Metropolitan Area has made Passage West an important residential alternative to Cork City and its Environs (Section 3.6.6).

Passage West functions as an important residential area (Section 3.6.3).”

What is perhaps most offensive is that although Section 3.2 of the appeal states that “the level of existing retailing in the town is worth considering”, it is crystal clear that the only research carried out for the purposes of this appeal was from Google Earth Streetview images taken in 2011. Many of the “existing” retailers listed by the appellant have long since gone out of business.

Harbour Medical Centre	In business long before the construction of the supermarket building, throughout Eurospar’s trading life and still in business. A medical centre operates by appointment and its success or otherwise is utterly unrelated to a supermarket. If medical centres were affected by supermarkets, it is unlikely that the HSE would recently have provided a large new primary care centre in an industrial estate on the Crosshaven Road outside the Carrigaline development boundary.
Mace shop	In business before the construction of the supermarket building. Changed hands many times. Still in business now as an XL. Very much a corner-type shop.
MA Healy & Sons	Specialised seller of safety and work wear with custom totally unrelated to a supermarket. In business long before the construction of the supermarket building, throughout Eurospar’s trading life and still in business.
Passage West Pharmacy	In business throughout Eurospar’s trading life and still in business. The pharmacy is one of several businesses in the town hosting and facilitating the signing of petitions and observations which will be sent to the Board to support the Aldi planning application.
Green Acres Grocery	Long since gone out of business.
Brendan’s Butchers	In business long before the construction of the supermarket building, throughout Eurospar’s trading life and still in business. The butcher is also hosting the signing of observations which will be sent to the Board to support the Aldi planning application.
Hairdressers	There are several hairdressers in the town, all of which were in business while Eurospar was trading and also while there was a hairdressers operating out of one of the units beside the supermarket. Hairdressers operate by appointment and are generally unaffected by opportunistic footfall.
Bookmakers	Cashman’s bookmakers long since gone out of business. This national chain of bookmakers went into liquidation in 2013.
Restaurants	There is no restaurant or café in Passage West.
Bars	Clearly unrelated to a supermarket.

The appeal does not give credence to the presence of either the post office or the credit union, both vibrant and valuable services in the town centre. Aware of how badly Passage West needs this Aldi store, both the post office and credit union are hosting and facilitating the signing of petitions and observations which will be sent to the Board to support the Aldi planning application. They were there while Eurospar was trading and know from experience that diversion of footfall is simply not a threat. On the contrary, they know that providing necessary services within Passage West enhances the commercial vibrancy of the town.

It is appallingly offensive to the ongoing efforts of both existing businesses and residents to develop our town that the appellant, although saying that “any new development proposal must have regard to its existing environment and this should be fully considered”, made absolutely no attempt to visit Passage West and do justice to that existing environment. Rather than fully considering anything, the appeal is utterly unrepresentative of the dynamics of our town. Without any doubt, it is attempting to damage rather than to assist the regeneration of Passage West.

- **Misrepresentation of the County Development Plan 2014**

From a retail perspective, Table 7.1 of the Cork County Development Plan 2014 defines Passage West as a Smaller Metropolitan Town. The aim of the County Development Plan for Smaller Metropolitan Towns is described in TCR 47 as being to “strengthen and consolidate” their retail role and function in accordance with the population growth planned for their local catchments. The Ballincollig Carrigaline Municipal District Local Area Plan (2017) aims for the population of Passage West to increase to 6,965 by 2022.

Passage West is one of four Smaller Metropolitan Towns defined in the County Development Plan. The other three are Carrigtwohill, Blarney and Glanmire. Section 3.1 of the Draft Metropolitan Cork Joint Retail Study (2013) identified existing retail floorspace in each of these four Smaller Metropolitan Towns:

	Convenience Retail (m²)	Comparison Retail (m²)	Warehousing (m²)	Total Floorspace (m²)
Passage West	1399	145	0	1544
Carrigtwohill	1962	1678	5029	8669
Blarney	954	3452	764	5170
Glanmire	2707	813	175	3695

The dearth of retail in Passage West relative to the other Smaller Metropolitan Towns is stark.

When this assessment was undertaken, Eurospar was trading. Without Eurospar, the total retail floorspace in Passage West is reduced to 538 sq.m.

In addition to the 2707 sq.m of convenience retail in Glanmire assessed in 2013, Aldi opened a store there in 2014 and Lidl opened a store in 2016. There is a Supervalu in Blarney town centre but Blarney residents generally do their bigger weekly shopping in the huge new Supervalu opened in its sister town, Tower, in 2017. The presence of the Supervalu in Tower has not in any way affected the viability of Blarney town centre.

Carrigtwohill is a town that is often compared to Passage West. At present, convenience retail services per head of population in Carrigtwohill are over four times those available in Passage West:

	Population (CSO, 2016)	Convenience retail floorspace (m²)	Ratio
Passage West	5843	538	0.09
Carrigtwohill	5080	1962	0.38

Carrigtwohill has a Mace (ex-Costcutter) at the western end of the town, an Aldi on the eastern edge of the town and a large and vibrant Centra right in the middle of the town centre. A Carrigtwohill-based County Councillor has confirmed to me that all three shops are doing good business.

It is quite clear that the current level of convenience retail provision in Passage West is woefully low relative to that provided in the other three Smaller Metropolitan Towns. Moreover, since the Joint Cork Retail Strategy was drafted in 2013, Blarney and Glanmire have enjoyed significant expansion in their convenience retail offerings whilst, with the closure of Eurospar, convenience retail in Passage West has been decimated.

The claim made in Section 7.1 of the appeal that “the current proposal is out of scale for the current needs of Passage West” is clearly totally unjustified and completely contrary to current convenience retail provision in Smaller Metropolitan Towns around Cork City.

- **Misrepresentation of Ballincollig Carrigaline Municipal District Local Area Plan 2017**

The appellant says that because neither Aldi nor the County Council addressed planning policies relating to protection of the existing town centre, a supermarket at this location would “undermine the existing town core” in what is a “fundamental contradiction of existing retail planning policy”.

The appellant utterly disregards the sequential approach outlined in the Retail Planning Guidelines 2012 which spells out how a site for convenience retail is to be chosen. Where in the long, narrow, linear town centre of Passage West could a reasonably sized convenience store be located? What free sites are there to provide this service to Passage West residents? And if a reasonably sized convenience store were to be located in the town centre, it would have an appallingly negative effect on traffic congestion. In fact, because of the town’s obvious physical constraints, Section 4.11.1 of the Retail Planning Guidelines are particularly applicable to Passage West:

“In certain limited circumstances, however, it may not be possible to bring forward suitable sites in or on the edge of a city or town centre because of the site requirements of large convenience goods stores, heritage constraints in historic towns or because the road network does not have the capacity to accommodate additional traffic and service vehicles. In these cases, the sequential approach should be used to find the most preferable sites.”

A procedure such as this was carried out 15 years ago when the supermarket got planning permission. In fact, although the site is on the edge of the town boundary, because of the pattern of recent residential development in Passage West, it is within only a 10 minute walking distance from the majority of Passage West homes. The following table demonstrates the residential areas from which Aldi can be accessed by a 10 minute walk or less, refuting the appellant’s claim that this is a “car based” supermarket:

Estate/Residential Area	Number of homes
Harbour Heights (existing & permitted)	428
Pembroke Wood	450
Rockenham	120
Ardmore Estate	80
Bellevue & the Green	30
Mansfield House (existing & permitted)	30
Toureen	30
Horsehead (existing & permitted)	20
Total	1188
Total homes (existing & permitted) in Passage West/Monkstown¹	2360
Total homes in Monkstown²	1892
Total homes in Passage West	
% of homes in Passage West within 10 mins walking distance of Aldi	63%

¹ CSO (2016) + permitted homes in Harbour Heights, Mansfield House and Horsehead

² Population by small area (Pobal, 2016) and assuming 2.75 persons/household (CSO, 2016)

- **Misrepresentation of the Aldi, Dunshaughlin case study**

Section 9.1.1 of the appeal correlates the Aldi planning application for a store in Dunshaughlin, Co. Meath (MCC Ref. RA/151231) to that in Passage West. It claims that the Board refused planning permission because the proposed store would “fail to consolidate and successfully achieve synergy with the existing retail core and town centre”.

The appellant has not mentioned the planning permission which has since been granted to Lidl for a site in Dunshaughlin almost directly across the road from the site of the proposed Aldi (MCC Ref. RA/170866). The Lidl planning application has far greater relevance to the Passage West situation than that proposed by Aldi. In Dunshaughlin, Lidl sought permission to establish on a site for which there was already a live grant of permission for a large retail development (MCC Ref. DA/110174; ABP Ref. PL17.239940). Their proposed store was to sit within the footprint of the permitted building, although incorporating some specific changes to accommodate the look and feel of the generic Lidl store. And, as is the case in Aldi Passage West, it proposed an accompanying café and two smaller units for lease.

The Aldi permission was refused, not because Aldi was at the edge of the town centre as the appellant suggests, but because the building was proposed for the back rather than for the front of the site. With all the car parking to the front, the proposed Aldi store would not have contributed to the streetscape of the main street but would rather have created separation in the town core. I have confirmed this by speaking directly to a planner in Meath County Council. On the other hand, Lidl pushed its building out to the front, strengthening the streetscape. So Aldi’s refusal of planning in Dunshaughlin had nothing to do with distance from the town centre. The proposed Aldi site was on the main street of the town centre, as is the now permitted Lidl across the road.

It is also worth noting that Dunshaughlin, like Passage West, is a Level 3 town in the context of the Retail Strategy. The Meath County Development Plan 2013-2019 indicates potential for a total convenience retail floorspace of 3,500 sq.m in Dunshaughlin over the lifetime of the Plan. In the current absence of a large supermarket, Passage West has 538 sq.m of convenience retail floorspace. This throws into stark perspective just how badly Aldi’s proposal to trade in an existing supermarket building in Passage West is needed.

Again, I wish to emphasise that in the case of the Aldi planning application for Passage West, whether this is the right location or not for this supermarket is not the subject of the current planning application.

2. Transportation and traffic

This is a long-established supermarket. It operated from 2008 until March 2017. The pattern and volume of traffic to, from and at the premises is nothing new. The appellant is critical of:

- The omission of a traffic impact statement
- The store being a car-based development
- Excessive parking provision
- Failure to assess closure of the second entrance
- Inadequate sustainable transport links to the store

- **A traffic impact statement has already been completed**

In all its years of business, there have never been any traffic issues associated with this supermarket or its junctions onto the R610. This has been confirmed by a Traffic Impact Assessment (MHL & Associates, 2016) undertaken as part of the planning application for the Harbour Heights development.

Harbour Heights is directly across the road from the supermarket. Cork County Council recently granted planning permission for its completion (CCC ref. 16/7217). This phase of its development includes for an additional 248 houses and construction of a roundabout on the R610. The roundabout will have four arms of which the supermarket entrance will be one.

The Traffic Impact Assessment involved peak hour traffic flow surveys at the Harbour Heights-supermarket-R610 junction for a two-hour morning peak (07.30 – 09.30) and one hour evening peak (17.00 – 18.00) on Tuesday 27th September, 2016. Traffic analysis was carried out for 2016 (Base Year) 2018 (Opening Year), 2023 (Opening Year + 5) and 2033 (Opening Year + 15) in accordance with TII guidelines. Eurospar was operational at the time and the Traffic Impact Assessment included for the Eurospar traffic flows.

Also relevant to the appellant’s concerns is that because of the nature and location of the Harbour Heights development, a stated assumption of the Traffic Impact Assessment was that most trips would be by car. Despite this, the traffic modelling concluded that even in 2033 with Harbour Heights fully constructed and the supermarket in operation, the roundabout would operate at 50% overcapacity with an estimated average of one car queuing on the R610 arm from Rochestown in the evening peak.

So it is reasonable to conclude that any change to traffic flows in this vicinity of the R610 would arise from the nearby Harbour Heights development, not from the well-established traffic patterns associated with the supermarket. Future Harbour Heights traffic has been the subject of a traffic impact assessment and has been proven not to be a concern.

- **The store would reduce, not increase, use of the car**

Despite his professed concern about the Aldi store generating traffic, the appellant did not make any submission to the recent planning application for the 248 houses in Harbour Heights. That dichotomy is curious.

The reality is that to reopen the supermarket as an Aldi would in fact reduce traffic rather than increase it. At present, residents of Passage West have to drive to Douglas, Mahon or Carrigaline for supermarket convenience retail. The R610 to Douglas is notoriously congested. Douglas village is a traffic blackspot. At certain times of the day, the N40 to Mahon functions more like a car park than a high speed road. Carrigaline has been crying out for a relief road for over 10 years. Should a realistic retail alternative for weekly shopping be available in Passage West, it would remove Passage West cars from these areas of well-known congestion and reduce distance travelled.

- **Parking provision is appropriate**

The appellant argues that 85 spaces is an overprovision of parking above standard requirements, thereby proving that the Aldi proposal is car-centric. This is not the case. The commercial area in which Aldi will be situated comprises two additional smaller retail units and a permitted café. The parking requirements for each of these units is laid out as follows:

	Nett floor area (sq.m)	Parking standard	Parking requirement
Supermarket	1006.0	1 per 20 sq.m	50
Units 1 & 2 (leased)	131.4	1 per 20 sq.m	6
Café	167.5	1 per 5 sq.m	33
Total			89

As demonstrated, the 85 spaces is actually an under provision, not an over provision. However it is likely that many will visit the café in conjunction with a shopping trip, so the deficit of 4 parking spaces will not be a problem.

- **Closure of the second entrance has already been assessed**

The second entrance was a historic non-compliance associated with the former supermarket. Its closure was a condition of a previous planning application applied for by the former owner of the supermarket (CCC ref. 15/6040). The Board will also appreciate that it simply would not work to keep using the second entrance when it would be located so close to the permitted roundabout.

- **The supermarket has better than average sustainable transport links**

The appellant argues that the site has “minimal connection” to “any means of sustainable modes of transport”, “ineffectual” pedestrian connections and no provision for cyclists. The appellant has no grounds for these claims. Sustainable transport links provided to this supermarket are as good as and better than those provided in most provincial towns and cities.

The 223 bus westbound stops right outside the door of the supermarket; the 223 bus eastbound stops across the road. Footpath linkage is provided all the way from the supermarket down to the town centre and beyond. Safe crossing places will be provided at the future roundabout and there is a controlled crossing directly outside the store at present. A magnificent greenway connects Rochestown to Passage West so the store can be safely accessed by bicycle. A 1.5 metre wide footpath connects the greenway directly to the store. It is very well used and is fully lit at night. Acknowledging the proximity of the greenway, the Aldi plans include for bicycle parking.

3. Inappropriate design

The only significant design change to the building proposed by Aldi is the removal of the glass tower entrance lobby. It is true that the glass tower is striking but there are many improvements associated with Aldi’s proposed relocation of the store entrance.

From a safety point of view, the position of the existing entrance lobby caused intermingling between pedestrians and moving cars. Shoppers with full trolleys returning to their cars used to walk past the car park entrances. If parking at the western end of the car park, they walked through the flow of traffic along the side of the building. The arrangement proposed by Aldi will remove this former hazard.



The image included in Section 9.3 of the appeal is intended to illustrate the visual impact of the glass tower. This image dates from 2011. Subsequent to 2011, Eurospar erected an ugly advertising totem on the green space in front of the retail complex which significantly detracted from the entrance to the town. Aldi proposes to remove this totem and this will represent a significant improvement. Aldi also proposes to landscape the green space in front of the store. Trees in this location will add greatly to the entrance to the town. The photomontage above has been prepared using the proposals detailed in Aldi's plans and elevations. It gives an indication of how the store is likely to look, confirming that the changes proposed will, if carried through as promised, enhance the entrance to Passage West.

Conclusion

I respectfully refer the Board to Table 4.2.3 of the Joint Metropolitan Retail Study carried out for the County Council by John Spain & Associates in 2013. It found retail floorspace in Passage West to be 68%. At the time, that percentage of vacant retail was far higher than vacancy in any other Metropolitan Town in County Cork. This study of vacancy was undertaken before Eurospar ceased to trade. Who could possibly denounce occupancy of by far the largest vacant retail unit in Passage West?

Aldi's proposal responds directly to the key recommendation of this Retail Study for Passage West to:

"Encourage the development of a national/international convenience multiple in Passage West town centre in order to increase competitiveness and provide a greater attraction for the town centre. There is a paucity of convenience provision in the town centre and such development would play an important role in meeting the needs of the residents of the town and in particular those without access to a car. The utilisation of existing vacant premises in the town centre core area and opportunity sites in the town centre and edge of centre locations should be encouraged."

Again, I must repeat that this recommendation was made whilst Eurospar was still trading. Even then, the Retail Study was recommending that Passage West needed more. Aldi now intends to establish in what has since become a vacant edge of centre premises.

Passage West is our town. We are proud of its location, its heritage and its community. Most of all, we are proud of its potential. For us, Aldi's promised occupation of the vacant supermarket in our town is more than just delivery of desperately needed services. It is the promise of a brighter future.

We are dumbfounded that anyone could appeal this planning application for what is a straightforward minor modification of an existing purpose-designed building to the Board. We are frustrated that it will inevitably result in the delay of badly needed vibrancy and services. We are angry that although this appeal claims to be in the best interests of Passage West, the appellant clearly didn't care sufficiently about our town or its residents to either visit or to collate data any more meaningful than seven-year old Google Earth images.

I worry that it may be almost impossible for the Board to appreciate how in 2018 a Metropolitan Town, sandwiched between two thriving residential areas, could be deprived of services. Perhaps the best illustration of life in Passage West without a car was posted in the last few days on the town's Facebook-based discussion page by a resident, Mr. Paul McAllister. With his permission, I am including it here for the benefit of the Board:

"Picture this scenario....

It's November, a wet cold dark dreary morning. You're a widower/pensioner/single mother/person who lives in Passage west. Money is tight, so once a week you have to go to Douglas to do your weekly shop. As the local small shop does not stock enough and it's more expensive. You go to the bus stop waiting for a 223 bus that may not show. Paying 15 euro each way on a cab is not an option. You drag your groceries back to the bus stop, soaking wet and freezing cold in Douglas. You wait for a crowded bus (no seats) or a bus that does not show (which happens more than it should). This is the reality for many who live in Passage West. Aldi would enhance the community and the lives of the people, who need it the most. Not everyone drives. Our community needs this development. Sometimes people think: ah Douglas, only a hop and a skip away. Try that on a winter

morning with very little cash. I do hope the delay is not going to stop us from getting a well-known supermarket in our locality with all the extras that come with it. Employment for the locals, more people using the town and it will also attract other businesses & new residents into Passage West."

I respectfully ask the Board to acknowledge that the issue of location, one of the key grounds on which this appeal is based, is not relevant to the current planning application. I respectfully urge the Board to support our town and its residents by granting planning permission for the minor modifications sought by Aldi for an existing vacant purpose-designed building. I also ask most sincerely that the Board's decision would be taken as expeditiously as possible so that Passage West may finally begin to move forward.

Please find enclosed the required fee of €50.

Yours faithfully,

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

Marcia D'Alton, B.E., M.Eng.Sc.

Independent Member, Cork County Council