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Cork City Council
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01 October 2021

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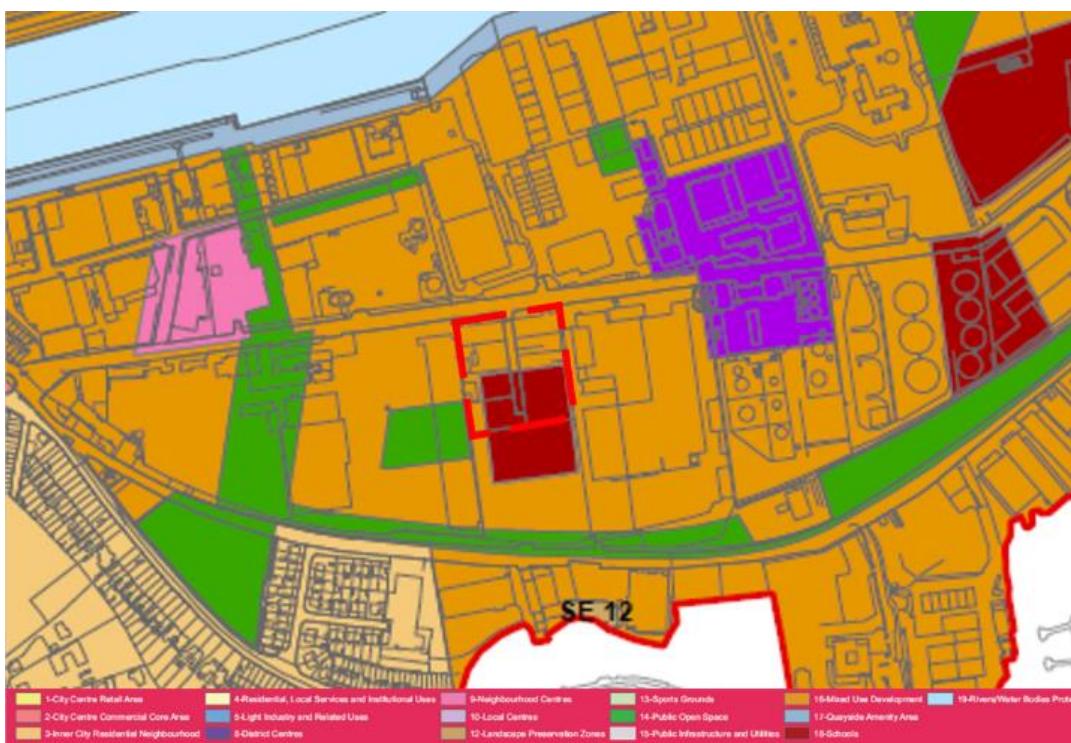
Re: Submission to the Draft Cork City Development Plan 2022 -2028 in Respect of the Educational Zoning Objectives in the South Docklands.

Dear Sir/ Madam,

This submission has been prepared on behalf of Fintan Riordan in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft CDP) and more particularly to the Council's draft policies and zoning objectives for Educational Uses in the South Docklands. Our client's lands (1.32 ha) are proposed to be rezoned from Objectives ZO 16 – Mixed Use Development and ZO 18 – Schools in the Cork City Development Plan 2015 -2021 to Objective ZO 13 - Education in the Draft Cork City Development Plan 2022-2028.

The lands in our client's ownership subject to this submission are outlined in Figure 1.1 below.

Figure 1.1 Current Zoning Objective of Subject Lands outlined in red (indicative).



01 SUBMISSION REQUEST

We request that the lands subject to this submission are rezoned to Objective ZO 05 - Mixed Use Development in the Cork City Development Plan 2022 -2028. The principles of mixed use zoned lands would provide for the delivery of a mix of vertical and lateral uses that would support the development of a new vibrant city quarter including educational uses. The stated aim of mixed use zoned lands in the Draft Development Plan is to *“to provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area”*. We are of the opinion that the lands fronting Centre Park Road have a significant opportunity to contribute to the successful delivery of a new urban quarter of Cork City.

02 PLANNING CONSIDERATIONS

The Draft Development Plan stipulates that the objective of education zoned lands is *“to provide for schools and educational facilities and related development”*. Furthermore adding that *“the main purpose of this zone is to provide for the wide range of education facilities...where it can be demonstrated that some of the lands associated with any parcel of lands in this zone are not required for educational purposes, consideration may be given on this zone to local services and local centres...”*

Figure 1.2 Zoning Objective of Subject Lands in the Draft Development Plan outlined in red (indicative).



02.1 Absence of a bespoke educational needs assessment for the South Docklands

We acknowledge that the South Docklands are allocated to deliver significant residential development over the lifetime of the forthcoming Development Plan, and it will be important to ensure adequate levels of education facilities are provided in tandem with the associated population growth. However, we consider that in assessing this need for Objective ZO 18 - Education that the Planning Authority should examine the availability of any spare capacity in the existing schools in the area and prepare a bespoke educational need assessment. In the absence of such information, the rezoning of all our client's lands to educational use is premature.

HW Planning have identified a number of primary and post-primary schools within the surrounding environs of the subject lands as below¹:

Primary School	attendance
Naoimh Antaine	825
Ballintemple NS	217
Scoil Barra Naofa (girls)	263
Scoil Barra Naofa (boys)	255
Scoil Naoimh Michael	44
Scoil Ursula	146
Our Lady of Lourdes	243
Naoimh Brid	546

¹ Data sourced from myplan.ie

Post Primary School	attendance
Colaiste Daibheid	232
Ashton School	521
Ursuline secondary	193
Christ the King (girls)	1,000
Regina Mundi	531
Colaiste Christ Ri	614

The changing demographics in the surrounding established residential areas should be a key consideration in the need for additional educational facilities in coming years and the requirement to rezone lands to provide such uses.

The Department of Education² has published figures on regional projections for full time enrolments to primary and secondary schools over the period 2018 - 2036 which shows that enrollments in the southwest region (including Cork and Kerry) are expected to fall by just over 29% over the period from 81,000 in 2018 to 57,000 in 2036. The figures also reveal that the decreases in demand will start at primary level in the mid to late 2020's with the post primary demand following suit from around 2030 onward. We consider that the quantum of lands reserved for educational use in the Draft Plan are over zoned and therefore not in the interest of sustainable development (4.7 ha).

The future housing mix envisaged for the South Docklands will also play a role in determining the demand for additional educational facilities in the area. It is anticipated that a significant proportion of housing will comprise smaller typologies to reflect recent trends in household formations and the demand for urban housing. We are of the opinion that the assumptions made in terms of school demand in the Urban Expansion Areas in the wider Metropolitan area will not necessary be reflective of the development of the South Docklands.

Notwithstanding the above, Objective 3.23 (c) of the Draft Plan stipulates that education facilities should *"encourage the co-location of schools as part of education campuses and with other*

² <https://www.education.ie/en/Publications/Statistics/projections/regional-projections-of-full-time-enrolment-primary-and-second-level-2019-2036.pdf>

community uses to create community hubs. This could facilitate the sharing of halls, playing fields and courts where feasible”.

We submit that our client's lands (c. 1.32 ha) will not be capable of facilitating the co-location of schools for a number of reasons. Firstly, our client's lands are located to the west of Centre Park Road and therefore physically removed from other educational zoned lands. The logistics around the sharing of resources between separated sites and in separate land ownerships will present significant construction and operational issues for the efficient sharing of resources as envisaged in the Draft Plan.

The Technical Guidance Document TGD-025 – Identification and Suitability Assessment of Sites for Primary Schools³ recommends that the size of a 2 no. storey school building site, depending on the number of classrooms required, ranges from 0.71 to 2.02 ha. On this basis it is apparent that the subject lands would be significantly less than what would be needed for the co-location of a number of schools and ultimately not in the interests of proper planning and sustainable development of educational facilities. We consider that a single consolidated educational campus would be more suited to meet the needs of the South Docklands.

02.2 The successful delivery of a new urban quarter through mixed use zoning objectives

The Draft Cork City Development Plan 2022 – 2028 identifies the South Docks as a “*significant long-term regeneration opportunity for Cork and Ireland...*” which will “...generate a new character in what will be a radical transformation.”

We submit that a mixed use zoning objectives in this location would present the opportunity for a pattern of development more in keeping with the notion of creating a “transformative” area and would provide an appropriate dispersal of uses as you travel east from the city centre.

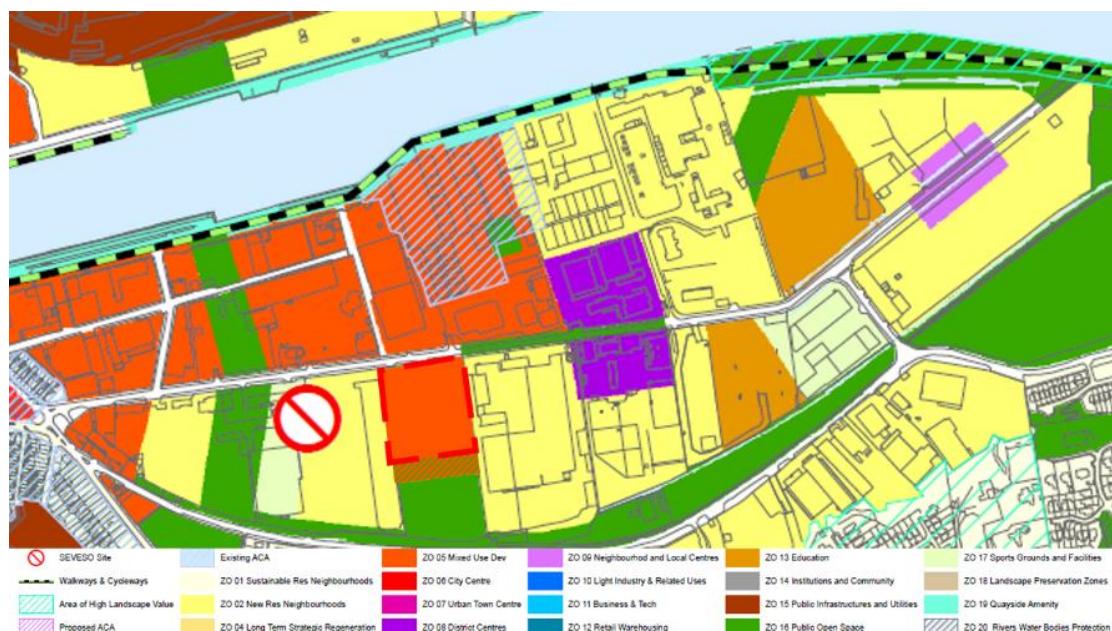
Our client's lands are located directly to the south of a proposed public transport corridor along Centre Park Road and is therefore considered an eminently suitable site for high density development. The subject lands are also closely positioned near mixed use zoning objectives to the north. We are of the opinion that mixed use zoning objectives at the site subject to this submission would contribute to the active surveillance of open space to the south and provide an appropriate transition to the New Residential Neighbourhoods to the east and west. The development of a vibrant mixed use frontage in this location has the potential to create an important north-south connection between lands zoned mixed use. In our opinion the potential to create such linkages are vital to the successful delivery of a new urban quarter in the South Docklands. Similar to the creation of green connections throughout the South Docklands, the zoning of these lands as mixed use will have the potential to provide through routes ensuring that the South Docklands are not developed as two separate linear areas along Centre Park Road and Monahan Road respectfully. Given the nature of educational uses they would typically not provide access to the public or provide linkages through the sites.

³ Department of Education, 2008. The Provision of Schools and the Planning System A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of the Environment, Heritage and Local Government.

We are of the opinion that the demand for school places within the South Docklands will be significantly less than the wider metropolitan area and re-iterate that the Planning Authority should examine the availability of any spare capacity in the identified existing schools in the area prior to rezoning of additional educational lands. We submit that a single consolidated educational facility serving the future residents of the South Docklands and surrounding environs is a logical approach that would be more akin to the contemporary patterns of developments and the objectives of the Draft Plan. The resulting designation of these lands as mixed use would therefore provide a more efficient use of these lands and contribute to the delivery of much needed housing.

An extract from the draft zoning map for the South Docklands is provided below illustrating our client's preferred approach for their lands in the forthcoming Development Plan. We are of the opinion that the lands to the south of our client's lands have the capacity to deliver either mixed use or public open space having regard to the adjacent land uses.

Figure 1.3 Preferred Zoning Objective of Subject Lands in the next stage of Development Plan outlined in red (indicative).



03 REQUEST

We welcome the opportunity to make this submission to the Stage 2 Public Consultation Draft City Development Plan 2022-2028. As outlined in this submission, we consider that the lands subject to this submission should retain and extend their mixed use zoning objective, now referred to as Objective ZO 05 – Mixed Use Development. As established in this submission, the subject lands do not have the capacity to deliver the co-location of schools as set out in Objective 3.23 (c) of the Draft Plan or as envisaged by the Department of Education in their guidance document.

We submit that a mixed use zoning objective on our client's lands would have the potential to provide an appropriate transition in uses when traveling east from the city center and would in keeping with a pattern of development that would be considered "transformative". Moreover, the subject lands have the potential to provide a vital connection between lands zoned mixed use to the north and south and prevent the delivery of two unrelated areas in the South Docklands to the north and south of the



future public transport corridor. We consider that a more balanced approach to the designation of mixed use lands north and south of Centre Park Road would foster a more sustainable pattern of development.

Yours sincerely

Harry Walsh
HW Planning