



h w p l a n n i n g

## **Submission to Draft Cork City Development Plan 2022 - 2028**

Zoning Submission – Lands at Maglin, Ballincollig, Cork

**Paul Healy**

October 2021

**Connecting people.**  
**Connecting places.**

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# 01 Introduction

## 01.1 Purpose of Submission

This submission has been made on behalf of Paul Healy. It has been prepared in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 (Draft CDP). This submission is in response to the Council's draft policies and zoning objectives for the settlement of Ballincollig. In the interest of clarity, the extent of the lands in our clients' ownership is illustrated in figure 1.1 as shown.

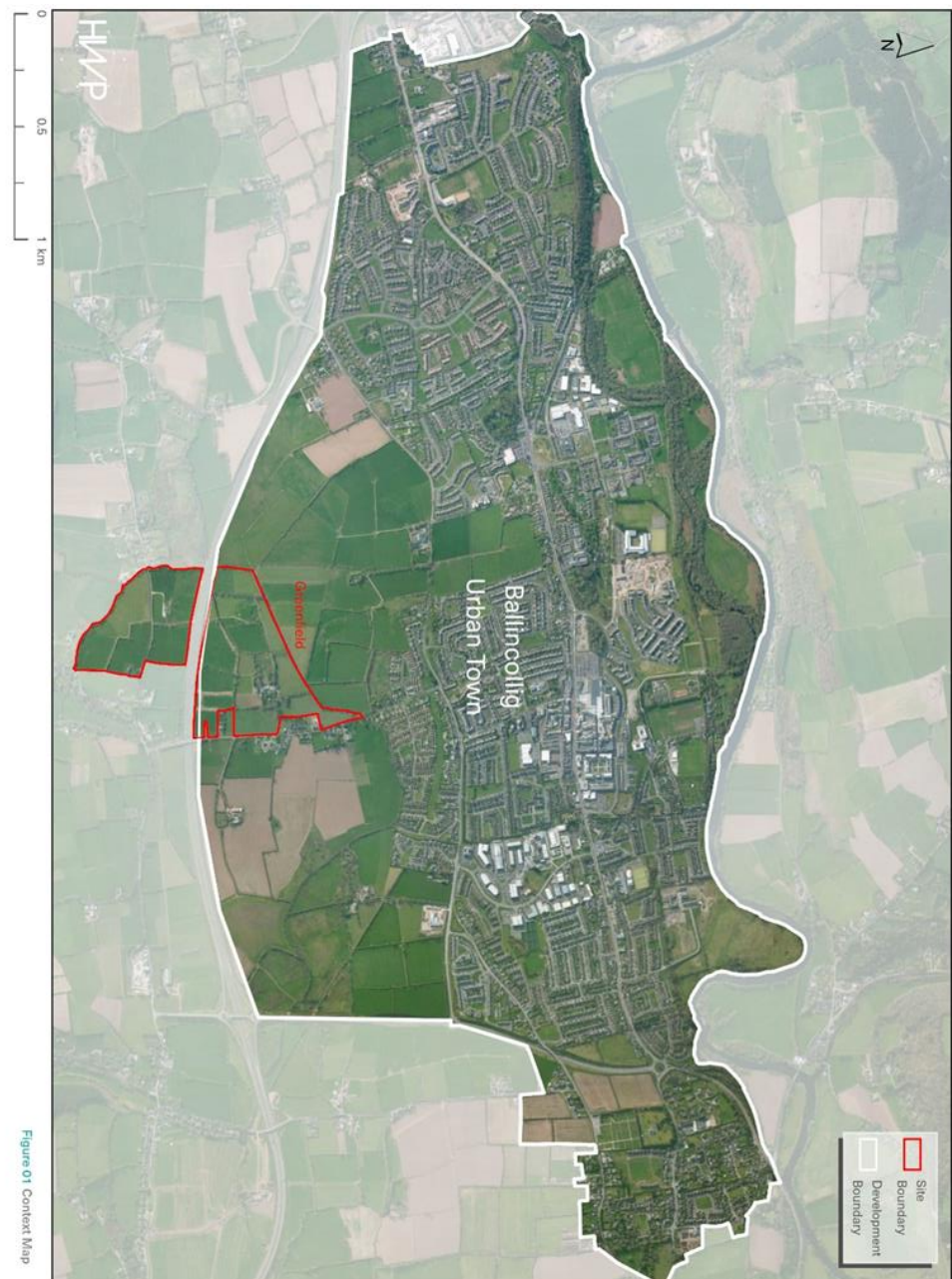


Figure 01 Context Map

Figure 01.1 Subject lands outlined in red

The subject lands, which form part of the wider Maglin Urban Expansion Area (Maglin UEA) are spread across several different zoning objectives in the Draft CDP. These include lands identified for future 'Education' uses (Zoning Objective ZO-13), as 'Tier 3 Residential Neighbourhoods' (Zoning Objective ZO-03), and Public Open Space (Zoning Objective ZO-16).

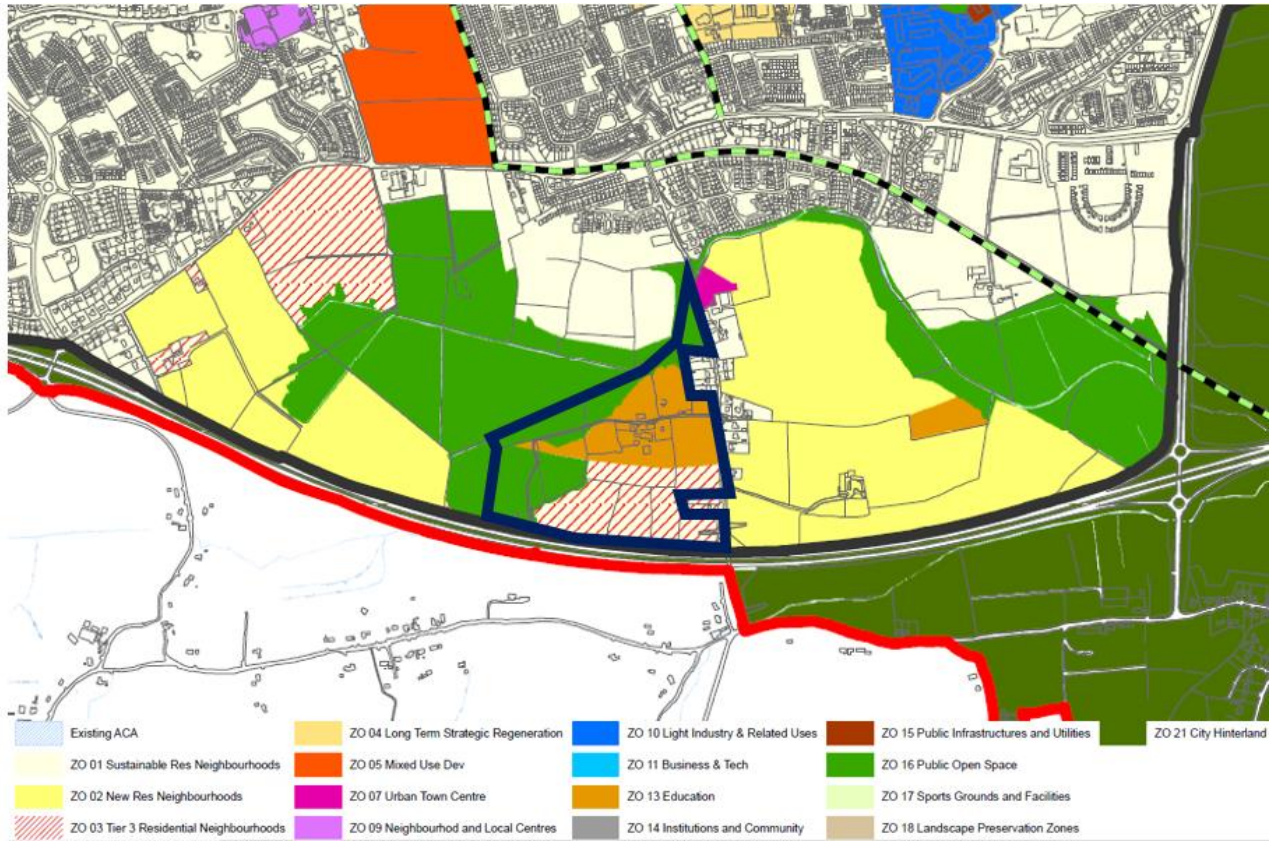


Figure 01.2 Draft CDP Zoning Map – Subject Lands outlined in Dark Blue

This submission requests that all the subject lands be included within the ZO-02 'New Residential Neighbourhood' zoning objective in the future City Development Plan for the following reasons.

- It is considered that a misinterpretation of the 2009 Flood Risk Guidelines has resulted in a portion of our clients lands, being zoned as future 'Public Open Space' (Zoning Objective ZO-16) in the Draft CDP.
- The identification of lands as 'Tier 3 Residential Neighbourhoods' (Zoning Objective ZO-03) jeopardises the delivery of the future Bus Rapid Transit (BRT) corridor which will traverse the Maglin UEA lands. The subject lands need to be included within ZO-02 in the future CDP to ensure the infrastructure necessary to facilitate the wider UEA is efficiently delivered.
- The identification of the ZO-13 education objective has not been informed by an updated 'Schools Needs Assessment' for Ballincollig and its identification as a future school site represents a legacy zoning objective from previous Local Area Plans. We consider the identification of three separate land parcels in the Draft CDP as ZO-13 reflects a disjointed and inefficient approach to cater for the Ballincollig's future schooling requirements and a revised strategy should be considered, whereby a consolidated educational campus is provided in the settlement similar to those in Carrigaline and Carrigtwohill.

# 02 ZO 16 - Public Open Space

## Zoning Objective

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### 02.1 Settlement Context

We consider the inclusion of lands within a ZO-16 'Public Open Space' zoning objective is inappropriate and not consistent with guidance contained in the 'Guidelines for Planning Authorities on the Preparation of Development Plans 2007', or criteria specified in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities November 2009' relating to the flooding 'Justification Test' in the preparation of Development Plans.

The basis for the inclusion of the subject lands within the ZO-16 'Public Open Space' is described in paragraphs 10.203 – 10.207 of the Draft CDP and the preparation of a new Drainage Study for the Maglin UEA lands. We note that preliminary findings of the new drainage study have not yet been published, however its findings are still framing future policies and objectives for Ballincollig. As the rationale and recommendations of the new drainage study have not been published, it is not clear if the zoning objectives for the Maglin UEA have accounted for any flood mitigation measures which can be accommodated and which were previously committed to in recent Local Areas Plans for Ballincollig. We note paragraph 10.206 of the Draft CDP which acknowledges that:

*"The flood zones illustrated in this plan are based on an undefended scenario and do not take the presence of flood protection structures such as walls or embankments into account."*

We note the agricultural fields to the southwest of the landholding, to the north of the N22 were not included within Flood Zones A/B in either the 2011 Macroom Electoral Area Local Area Plan (2011 LAP) or the Ballincollig Carrigaline Municipal District Local Area Plan 2017. Both of these adopted plans were prepared in accordance with the 2009 Flood Risk Guidelines and contained a Strategic Flood Risk Assessment.

Some areas of the lands to the west of the landholding were identified as being within Flood Zones A/B in the 2011 and 2017 LAPs, however as described below, both LAPs identified specific drainage and flood relief measures which would resolve the flooding issues in the Maglin UEA and facilitate the UEA's effective delivery.

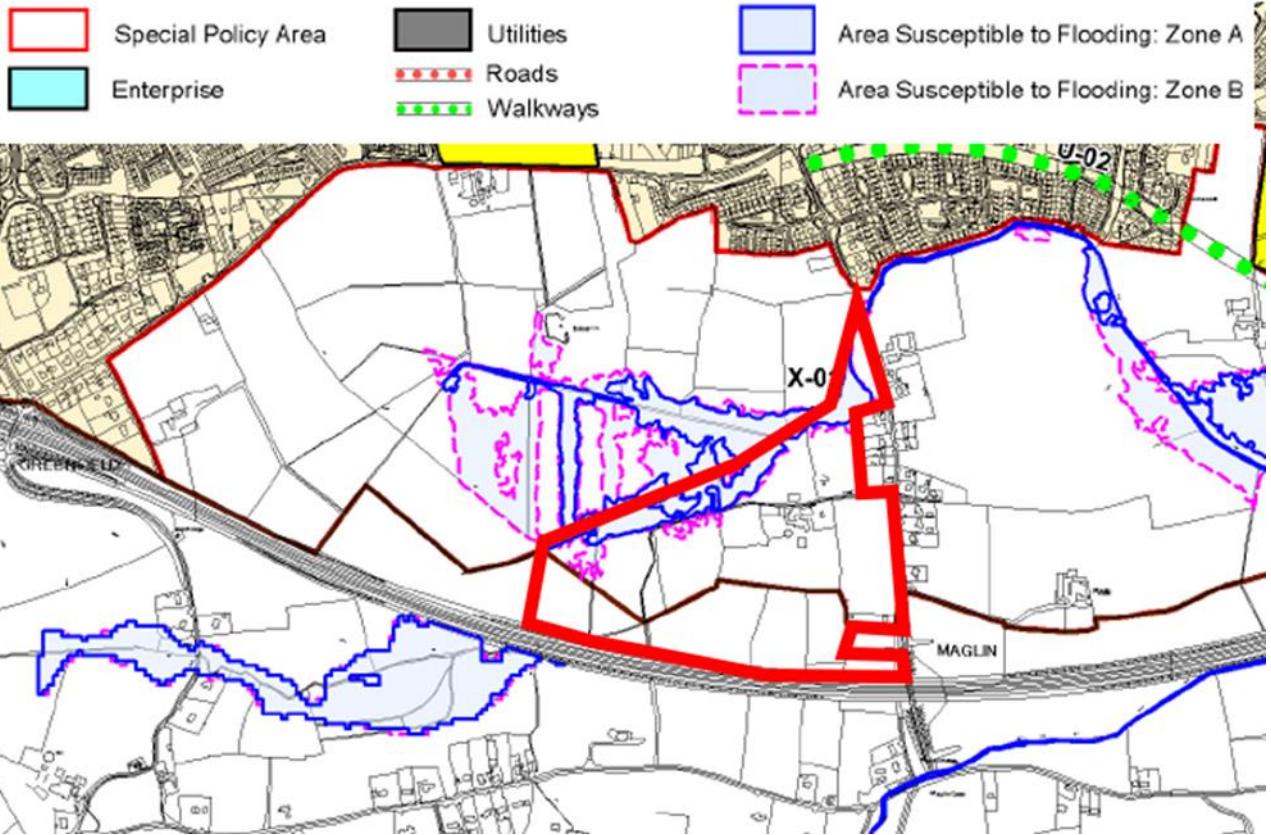


Figure 02.1 2011 LAP Zoning Map - Site Location within X-01 Objective in context of Flood Risk Areas

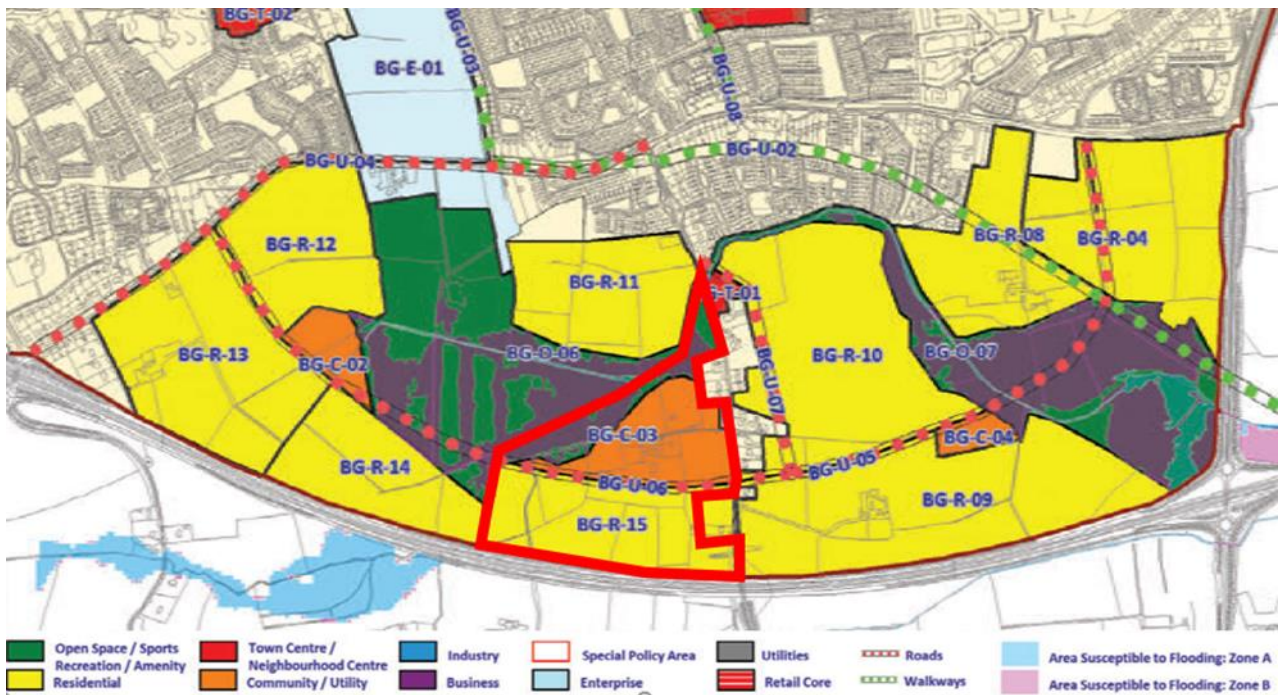


Figure 02.2 2017 LAP Zoning Map - Site Location within BG-R-15, BG-C-03 and BG-O-06 zoning objective

It has been widely acknowledged since the publication of the 2011 LAP, that the flood risk situation at the Maglin UEA has been largely caused by water run-off resultant from the delivery by the state of the N22 Ballincollig bypass to the south. Cork County Council who

first identified the future delivery Maglin UEA, identified various measures to resolve the increased flood risk in the UEA resultant from the delivery of the N22. This was recognised in paragraph 1.2.28 of the 2011 LAP.

*1.2.28 - "River training works (North Maglin River Tributary) are proposed under the Collection System Upgrade. Construction of this would be post 2012. There will be land acquisition and wayleave issues relating to proposed river training works."*

Paragraph 3.3.55 and table 3.2 of the 2017 LAP specified that the implementation of a new SUD strategy would be implemented in Maglin to accommodate development in this area of the UEA.

*3.3.55 - "Parts of the Maglin Urban Expansion site are also at risk of flooding and this issue will need to be addressed as part of the preparation of the framework masterplan for those lands."*

Table 3.2 : Phase 2: Development Programme: Ballincollig	
Phasing of Development	Strategic Infrastructure and Service Requirements*
Prior to Granting of Planning Permission for Phase 2	<ul style="list-style-type: none"> <li>Phase 2 Transport Assessment required to identify road and transport infrastructure and required timing for delivery</li> </ul>
➤ 1,770 * Dwelling Units	<p><u>Open Space</u></p> <ul style="list-style-type: none"> <li>Completion of Phase 2 area of Linear Park and Castle Protection zone</li> </ul> <p><u>Water Services</u></p> <ul style="list-style-type: none"> <li>Provision of capacity for waste water treatment and collection</li> <li>Implementation of SUDs Study Recommendations</li> </ul> <p><u>Transport</u></p> <ul style="list-style-type: none"> <li>Killumney Road Upgrade Phase 1 and 2.</li> <li>Construction of Link Road West</li> <li>Construction of Link Road /Killumney Road junction roundabout</li> <li>Implementation of Ballincollig Cycling and Walking Network</li> </ul> <p><u>Education</u></p> <ul style="list-style-type: none"> <li>Provision of a sites for a Primary and Secondary School</li> </ul>

Figure 02.3 Table 3.2 of 2017 LAP

However, these works have yet to commence. Our client has concerns that works that were previously committed to be implemented by Cork County Council, and which would have alleviated flood risk in this area, are no longer being considered in the future CDP.

## 02.2 Flood Risk Management Guidelines for Planning Authorities – 2009

We consider that the land-use objectives of the future CDP and specifically the Maglin UEA should reflect the statutory objectives of the 2009 Flood Risk Management Guidelines. Chapter 4 'Flooding and Spatial Planning' of the guidelines describes a key message as.

*"The application of the sequential approach and, in some exceptional cases, the Justification Test should be used by planning authorities in successfully and transparently incorporating flood risk into the decision-making process on development plans and enabling town centre and minor infill developments to proceed. Development plans must include a statement of how the Guidelines have been implemented."*



Box 4.1 of the guidelines (page 37) refers to the 'Justification Test for Development Plans'. In the identification of lands for future development in Development Plans, specific criteria relating to the Justification Test must be satisfied.

As the lands were excluded from Flood Zones A/B in both the 2011 and current 2017 LAP's and zoned for residential development, the lands satisfied the criteria of the Justification Test identified in the Guidelines. This confirms that the zoning of the lands in the 2011 and 2017 LAPs was consistent with all criteria specified in the 2009 Guidelines. Both of these adopted plans were prepared in accordance with the Flood Risk Guidelines and contained a Strategic Flood Risk Assessment.

**Box 4.1: Justification Test for development plans**

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan<sup>1</sup>, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:

- 1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
  - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement<sup>2</sup>;
  - (ii) Comprises significant previously developed and/or under-utilised lands;
  - (iii) Is within or adjoining the core<sup>3</sup> of an established or designated urban settlement;
  - (iv) Will be essential in achieving compact and sustainable urban growth; and
  - (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
- 3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.
 

N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

Figure 02.4 Box 4.1 – 2009 Guidelines

We note Circular PL 2/2014, dated 13 August 2014 which clarifies advice stated in the 2009 Guidelines regarding the preparation of Development Plans.

*"During the preparation of the development plan (or a variation of a development plan) in areas located in flood zone A&B, where the existing use zoning is classified as a "vulnerable use", the planning authority should consider if the existing use zoning of the 'vulnerable use' is still the appropriate zoning for the area. Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non- structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced."*

As previously referenced the subject lands were subsequently zoned for residential development in the 2017 LAP and not included within any flood risk zone. Measures to address the potential increases in surface water run-off generated from the delivery of the

N22 bypass have been identified in both the 2011 and 2017 LAP's. The delivery of these works would resolve any perceived flood risk issues in this portion of the UEA.

We consider the Draft CDP, which has been informed by the unpublished Drainage Study for the Maglin UEA, represents an incomplete assessment of the flood risk situation in the area. We particularly note paragraph 10.206 of the Draft CDP which acknowledges that the flood zones illustrated in the Draft CDP mapping are based on an undefended scenario and do not take the presence of flood protection structures such as walls or embankments.

Our client regrets that no reference is made in the Draft CDP to previously committed drainage and surface water upgrades in the Maglin UEA which would resolve the drainage issues resulting from the construction on the N22 to the south. The future undertaking of these works would resolve any potential flood risk considerations at the proposed ZO-16 'Public Open Space' at our client's landholding and result that residential development within the ZO-02 objective could be delivered during the lifetime of the plan.

We note Section 6.4 of the 2009 Guidelines which states that:

*"Planning authorities must strike a fair balance between avoiding flood risk and facilitating necessary development, enabling future development to avoid areas of highest risk and ensuring that appropriate measures are taken to reduce flood risk to an acceptable level for those developments that have to take place, for reasons of proper planning and sustainable development, in areas at risk of flooding."*

We consider that all of the lands in our client's ownership should be zoned for residential development and the same is consistent with the 2009 Flood Risk Guidelines.

# 03 ZO 03 – Tier 3 Residential Zoning Objective

## 03.1 Necessity for the Subject Lands to be identified as ZO-02

We consider the inclusion of the southern areas of our clients' lands within the Tier 3, ZO-03 objective, jeopardises the timely and appropriate delivery of the wider Maglin UEA. The subject lands are located in a strategically important location to the west of the Maglin Road. The indicative route of the future BRT corridor which will run east/west across the UEA lands is not illustrated in the Draft CDP mapping. However, the 2017 LAP does indicate the indicative BRT through objectives BG-U-05 (East of the Maglin Road) and BG-U-06 (West of the Maglin Road). The BG-U-06 objective traverses our clients' lands resulting that the future delivery of development of our clients' lands will be a critical determinant in the timeframe for the delivery of the route and the Maglin UEA more generally.

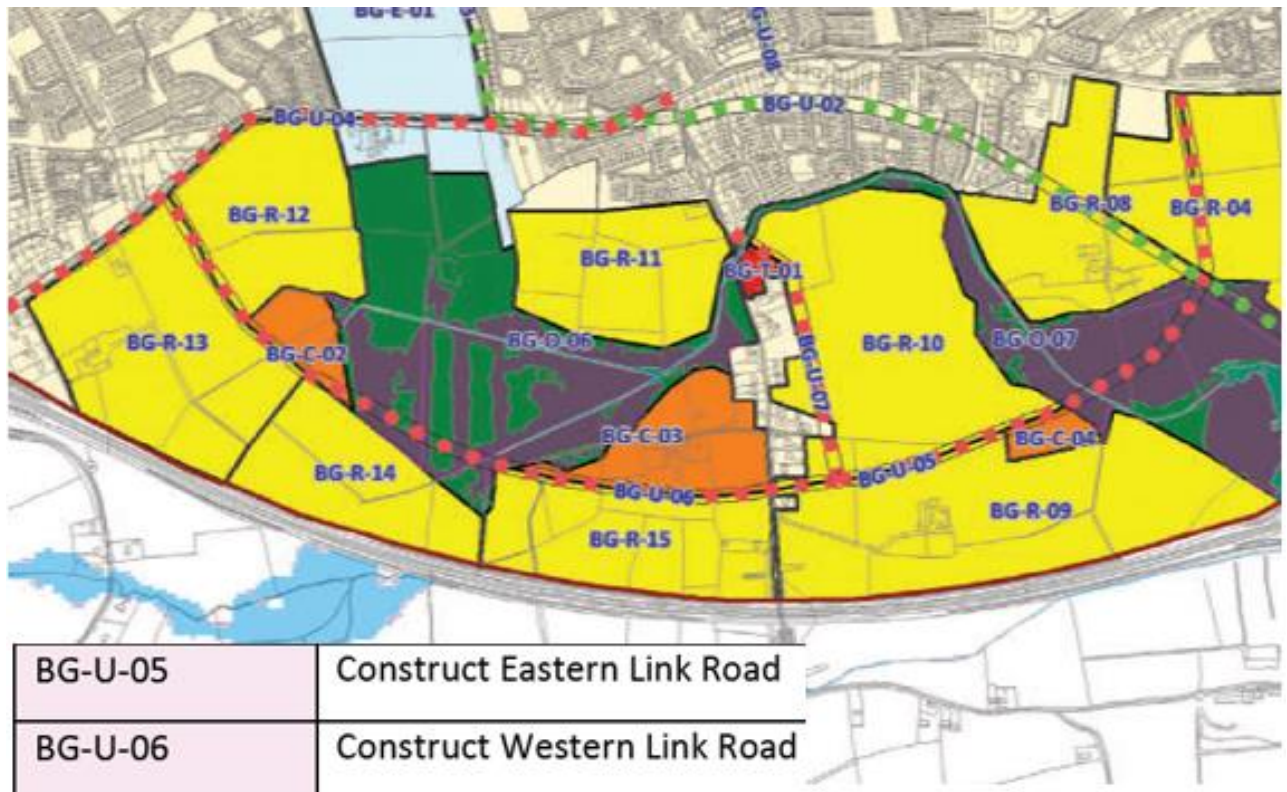


Figure 03.1 2017 LAP Zoning Map demonstrating indicative route of BRT (BG-U-05 & BG-U-06)

The Draft CDP zoning maps demonstrate that our clients' lands are divided by the previous indicative route of the BRT to provide for ZO-13 education uses to the north and ZO-03, tier 3 residential development to the south of the route<sup>1</sup>. This results in significant

<sup>1</sup> As illustrated in figure 1.2

development constraints at the landholding with the ZO-13 lands not suitable for a consolidated educational campus (refer to section 04 of this submission) and the ZO-03 lands not expected to be developed during the 2022-2028 Plan period<sup>2</sup>. The likely outcome of these factors is that the lands remain undeveloped for the duration of the 2022-2028 CDP and a key stretch of the BRT not being delivered.

Given the strategic importance of the delivery of the BRT to the overall Maglin UEA, it is imperative that future zoning objectives of the UEA facilitate the routes' delivery during the lifetime of the forthcoming plan. This will necessitate a re-evaluation of the tier 3 objective at the subject lands. We consider the inclusion of the subject lands within the ZO-02 '*New Residential Neighbourhoods*' objective will facilitate the realisation of the BRT during the lifetime of the future CDP and represents a coherent and adaptive strategy for the delivery of critical infrastructure to serve the wider Maglin lands. The identification of the lands within a ZO-02 objective would not only assist in accommodating the future delivery of the BRT but also other landlocked areas of the UEA which are identified for future development.

In summary, it is requested that the subject land be re-zoned to ZO-02 '*New Residential Neighbourhoods*' in the new city plan which would facilitate the phased delivery of the UEA in tandem with necessary critical infrastructure.

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<sup>2</sup> Tier 1 comprises serviced zoned lands that is sufficiently serviced to accommodate new development. Tier 2 lands are serviceable zoned lands that are not currently fully serviced but have the potential to become fully serviced within the life of the Plan. Tier 3, which are strategic lands necessary for long-term planning of infrastructure, given the ambition growth target set out in the NPF, but also provide for substitution of Tier 1 or Tier 2 lands that do not come forward for development within this Plan period, where appropriate.

# 04 ZO 13 - Education Zoning

## Objective

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### 04.1 Future School Provision in Ballincollig

We consider it is necessary to revisit the distribution of future schools to be provided in Ballincollig as identified in the Draft CDP. Specifically, we consider that the rationale of the identification of three separate sites in Ballincollig for future ZO-13 educational uses reflects a disjointed and inefficient approach to cater for the Ballincollig's future schooling requirements.

We note that the Draft CDP does not include a 'Schools Needs Assessment' for Ballincollig or the Maglin UEA. We also note Draft CDP Objective 10.60, 'Ballincollig Education' does not provide any rationale for the identification of the ZO-13 lands and states that future discussions will take place with the Department of Education regarding the identification of locations for new schools in the town. Draft CDP Objective 10.60 states in full.

*10.60 "Cork City Council will work with the Department of Education and landowners to identify new school sites for the town and its wider catchment."*

The Draft CDP identifies 3 no. potential future sites for schools for Ballincollig as illustrated in figure 4.1 as shown.

- Site No. 1 – Lands of circa 10.9 hectares identified adjacent to the Lisheen Woods residential development to the west of the town,
- Site No. 2 – Lands of circa 7.7 hectares in our clients' ownership within the Maglin UEA.
- Site No. 3 – Lands of circa 1.5 hectares to the east of our clients' landholding, also within the Maglin UEA.



Figure 04.1 Draft CDP Zoning Map illustrating future ZO-13 lands

We consider the identification our clients lands for future educational uses is inappropriate and the sole reason for its identification as a future school site are legacy issues associated with the lands being previously included within the BG-C-03 objective in the 2017 LAP for a future secondary school.

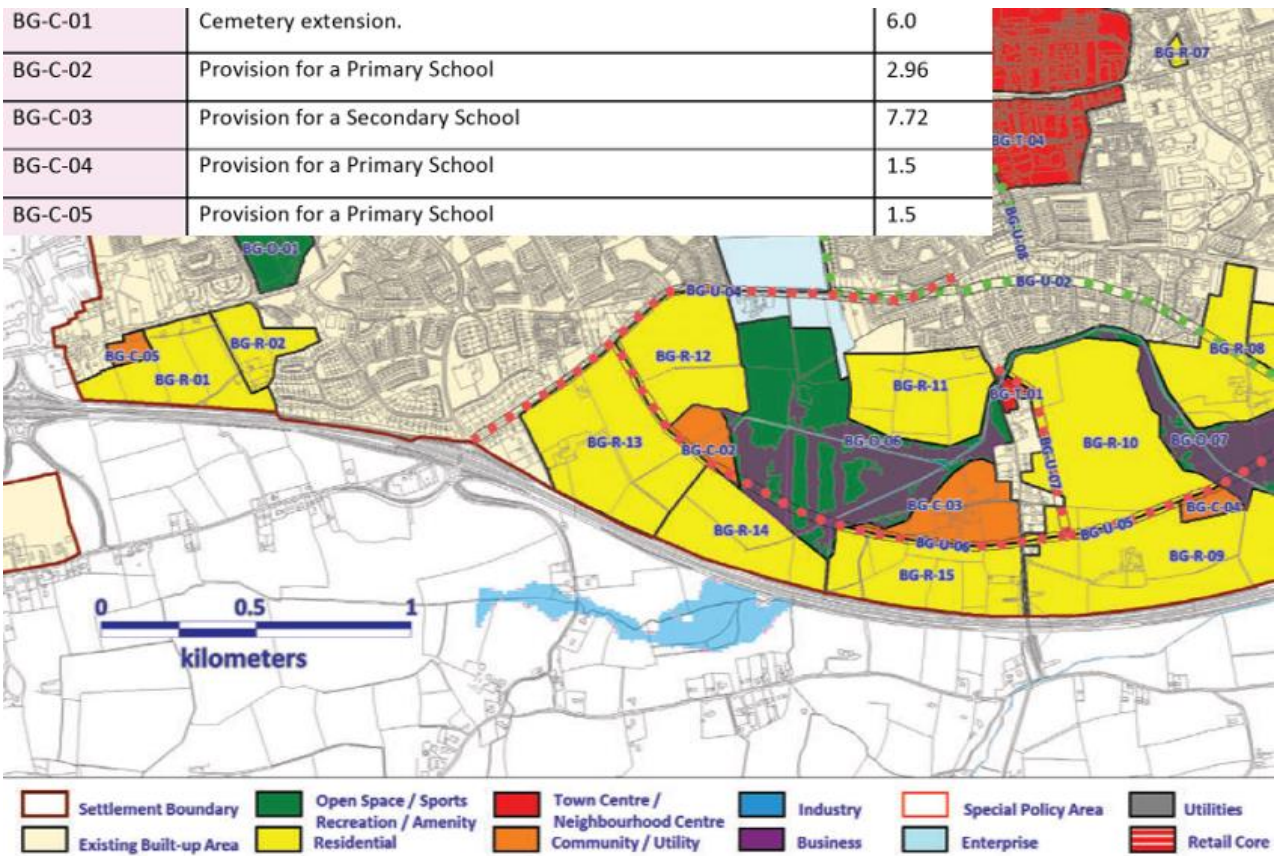


Figure 04.2 2017 LAP Zoning Map – Site included within BG-C-03 zoning objective.

Referring the delivery of new schools during the lifetime of the plan, paragraphs 3.67-3.69 and Table 3.7 of the Draft CDP (Page 85) confirm that Ballincollig likely needs 2 no. additional primary schools and 1 no. additional secondary school to satisfy future need.

We request that a strategic review take place in consultation with the Department of Education and relevant landowners to identify the most appropriate location for a multi-school educational campus in Ballincollig. As proposed in the Draft CDP, a combined area of approximately 20 hectares is being reserved for the delivery of 3 no. separate school campuses, 2 no. of which are within the Maglin UEA. The feasibility of the future delivery of these school objectives is reliant on the timely delivery of the BRT corridor through the UEA lands. Our client requests that a strategic review of the UEA be undertaken and that the feasibility of a consolidated educational campus within the UEA be investigated. This review should also occur in conjunction with the drainage/surface water upgrades for the Maglin UEA previously referenced in this submission, which would allow for the most appropriate site for the campus being identified.

This strategy should be informed by an updated 'Schools Needs Assessment' for Ballincollig and the campus should be strategically located whereby the locations of other existing schools in the settlement are considered, providing a geographic dispersal of school facilities in the town. Currently we note that the ZO-13 objective of 1.5 hectares to the east of our clients' lands is situated only 500-600 metres from the existing Gaelscoil Uí

Ríordáin which was only opened in 2011 demonstrating the inefficiencies of the current approach.

We consider that a consolidated education campus would represent a more effective use of land and resources in the UEA, potentially freeing up other lands for additional residential or other uses. It is evident that the provision of consolidated educational campuses has become an increasingly regular approach for the delivery of new educational facilities in the Cork in recent years. In Carrigaline the provision of a consolidated education campus has been successfully pursued and is currently under construction<sup>3</sup>. The Carrigaline Schools Campus provides for 1 no. secondary school and 2 no. primary schools with an overall capacity of approximately 1,000 students.

The land take required to deliver a schools campus is significantly less than that currently reserved for future educational uses for Ballincollig in the Draft CDP. The Carrigaline campus has an overall site area of 8.5 hectares which included a significant archaeological buffer zone where no construction works are occurring. Similarly, in Carrigtwohill, the Minister for Education and Skills was granted permission by Cork County Council on 2<sup>nd</sup> July 2020<sup>4</sup> for the construction of a new educational campus comprising 2 no. primary and 1 no. secondary school on a total site area of 9.6 hectares. Again, this is considerably less than the combined land take of the proposed ZO-13 objectives of over 20 hectares in the Draft CDP.

The adoption of local policy objectives to maximise efficiencies and provide shared educational campuses is supported by current local, regional and national policy and guidance. This is reflected in RPO 185 of the RSES which states regarding the location of 'new schools facilities'.

*"Local authorities should ensure that a robust site selection process is followed in the selection of new school locations taking into account proximity to community developments such as community centres, playing fields, libraries etc. so that the possibility of sharing facilities can be maximised."*

Governmental guidance in the form of 'The Provision of Schools and the Planning System 2008'<sup>5</sup> states that the Department of Education and Science<sup>6</sup> will;

*"Consider the use of multi-campus schooling arrangements in appropriate cases, e.g. 2 or 3 schools side by side; a primary and a post-primary school sharing a site; schools anchoring wider social and community facilities required in the same area."*

Our client's family currently operates 'Healy's Honey', at the subject lands which is a honey production and storage facility, operating as a family business since 1973. Under Cork County Council Planning Application Reference 18/7408, permission was granted for the expansion of the honey production facility which is situated within the established family farmyard contained wholly within the ZO-13 objective of the Draft CDP.

We consider that the fragmented approach for the delivery of new schools in Ballincollig/Maglin does not represent an efficient or viable means of strategically addressing school needs in the settlement. As referenced previously, 7.7 hectares of our

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<sup>3</sup> Cork County Council Planning Reference 15/4388 and An Bord Pleanála Reference LV 04.LV3287

<sup>4</sup> Cork County Council planning application reference 19/5707

<sup>5</sup><https://www.housing.gov.ie/sites/default/files/migratedfiles/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C17998%2Cen.pdf>

<sup>6</sup> Now the Department of Education and Skills

clients' lands were identified for a future secondary school in the objective BG-C-03 of the 2017 LAP and again in objective ZO-13 objective of the Draft CDP. As evidenced in the consolidated educational campuses at Carrigaline and Carrigtwohill, this is an excessive and inefficient land take for the sole delivery of a new secondary school. As demonstrated at Carrigaline and Carrigtwohill, consolidated school campuses generally require a site area of at least 8.5 -9.5 hectares to comfortably accommodate the requirements of a multi-school campus. This reflects that while the proposed ZO-13 objective at our clients' lands are excessive in area for the provision of one secondary school, it is likely too restrictive in area to provide a consolidated multi-school educational campus.

We request that in assessing the future delivery of the UEA, a comprehensive review of the future school provision to serve the future population of Ballincollig should be conducted. This will need to be informed by an updated 'School Needs Assessment' for Ballincollig and a robust site selection process to ensure that the delivery of new housing and educational uses can be delivered in an integrated manner.



# 05 Strategic Importance of the Delivery of the Maglin UEA

## 05.1 Development Context

Ballincollig is identified as a ‘Metropolitan Town’ in the Cork MASP of the RSES. Section 7.2 of the Cork MASP recognises the strategic importance of the delivery of the Maglin UEA in terms of Cork meeting its ambitious population targets set out in the National Planning Framework. The RSES targets 3,570 no. residential units at Maglin with key infrastructure priorities including.

- Maglin Urban Expansion Area Phased Infrastructure Packages and
- a Sustainable Urban Drainage Strategy.

Location	Brief Description and Indicative Yield: Yields are indicative only, will be revised in the context of compact growth targets, departmental guidelines and development plans.	Infrastructure Priorities subject to required appraisal, planning and environmental assessment processes
Ballincollig	<p>Ballincollig is the largest and fastest growing town in Cork, building on its IT specialism and potential for improved public transport links to the City via the Cork Science and Innovation Park.</p> <p>Urban Expansion Area of Maglin.</p> <p><b>Potential Residential Yield: 4582 (includes Maglin UEA 3,570).</b></p>	<p>As per Chapter 3 Objective on investment for holistic infrastructure for metropolitan areas.</p> <ul style="list-style-type: none"> <li>• Maglin Urban Expansion Area Phased Infrastructure Packages.</li> <li>• CMATS recommendations re road network / public transport (LRT in particular).</li> <li>• Waste Water Infrastructure upgrades.</li> <li>• Water Supply Upgrades.</li> <li>• Local Road improvements (Killumney Road Upgrade, Maglin Road realignment).</li> <li>• Delivery of Cork Northern Ring Road.</li> <li>• Sustainable Urban Drainage Strategy.</li> <li>• Investment in retrofitting infrastructure and services (physical, social and recreational) to improve quality of life for communities.</li> </ul>

Figure 05.1 Figure 07 - RSES Targets for Ballincollig

The Core Strategy of the Draft CDP places a similar strategic importance in the delivery of the Maglin UEA as a new growth centre for significant population and housing growth. This is reflected in Draft CDP Objective 10.55 – ‘South Ballincollig (Maglin) Expansion Area’ which aims to:

*“To support the compact growth and development of South Ballincollig Expansion Area as a strategic City consolidation and expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a co-ordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.”*

We also note Draft CDP Objective 10.59 ‘Ballincollig Flood Risk’ which states that.

*“Development in Ballincollig will only be permitted in areas not at identified risk of flooding. Additionally, all new proposed development proposals within the Maglin / South Ballincollig Expansion Area shall be accompanied by individual site-specific flood risk assessments.”*

Given the strategic importance of the delivery of the Maglin UEA as confirmed in the RSES, we consider that the Draft CDP should prioritise the delivery of critical infrastructure to facilitate its future delivery. This includes the implementation of the previously committed drainage upgrades to resolve increased surface water run-off generated from the construction of the N22 Ballincollig bypass. We consider these works are necessary as the extent of public open space provision in the Maglin is excessive and will prevent housing targets from being achieved during the lifetime CDP.

# 06 Request

## 06.1 Summary

In summary, we request that the entirety of our clients landholding be included in the ZO-02 'New Residential Neighborhood' zoning objective for Ballincollig in the 2022-2028 Cork City Development Plan for the following reasons.

- Areas of the subject lands have not been included in either Flood Risk Zones A/B in the 2011 or 2017 LAPs for Ballincollig. The 2011 and 2017 Local Area Plans had specific objectives for the delivery of a Sustainable Urban Drainage strategy for Maglin which would facilitate future development at the lands and address potential increase water run-off resultant from the delivery of the N22 Ballincollig Bypass. These LAPs were both prepared in accordance with the Flood Risk Guidelines and contained a Strategic Flood Risk Assessment confirming that the identification of the lands for future residential use are in accordance with the Justification Test.
- The Draft CDP refers to the preparation of a new Drainage Study for the Maglin UEA lands as a basis for the inclusion of a portion of our clients in a ZO-16 Public Open Space zoning objective. The findings of the new Drainage Study have not yet been published and it is not evident to what extent any mitigation measures have been assessed in the revised flood risk analysis of the Maglin UEA.
- The efficient delivery of the Maglin UEA during the lifetime of the 2022-2028 CDP is a key strategic objective of the Draft CDP and RSES. The delivery of critical infrastructure to enable development at the lands is a key determinant regarding its ultimate delivery. We request that the objectives of the future CDP fully align with the population and housing targets set out for the UEA and those previous commitments made by Cork County Council relating to the delivery of a Sustainable Urban Drainage strategy be enshrined as key objective.
- The inclusion of lands within the ZO-03 zoning objective jeopardises the delivery of the future Bus Rapid Transit (BRT) corridor which is a critical infrastructural objective for the wider UEA lands.
- The Draft CDP has not been informed by a settlement specific 'Schools Needs Assessment' for Ballincollig. The identification of three separate land parcels of circa 20 hectares in area represents an inefficient means of accommodating Ballincolligs' future schooling requirements. It is considered that a consolidated educational campus is provided in the settlement similar to those in Carrigaline and Carrigtwohill which would reflect a more efficient use of developable lands in Ballincollig.
- The ZO-13 lands at our clients' landholding are too restrictive in area and by the future BRT to provide a consolidated multi-school educational campus. It is considered that Cork City Council should engage further with the Department of Education and other relevant landowners in the area regarding the delivery of a multi schools educational campus in Ballincollig, to serve its future population.



