



COMER
GROUP
IRELAND

Re: Draft City Plan 2022-2028 & Zonings

26th April 2022

Dear Sir/Madam,

We refer to the above and welcome your invitation for submissions in respect of the proposed Material Amendments to the draft City Plan.

For consideration this submission sets out our requests for lands under our ownership in the South Docks as highlighted below.

To summarise the overall site owned by Comer Group comprises 21.3 acres, and is split into two parts comprising 18 and 3.3 acres respectively.

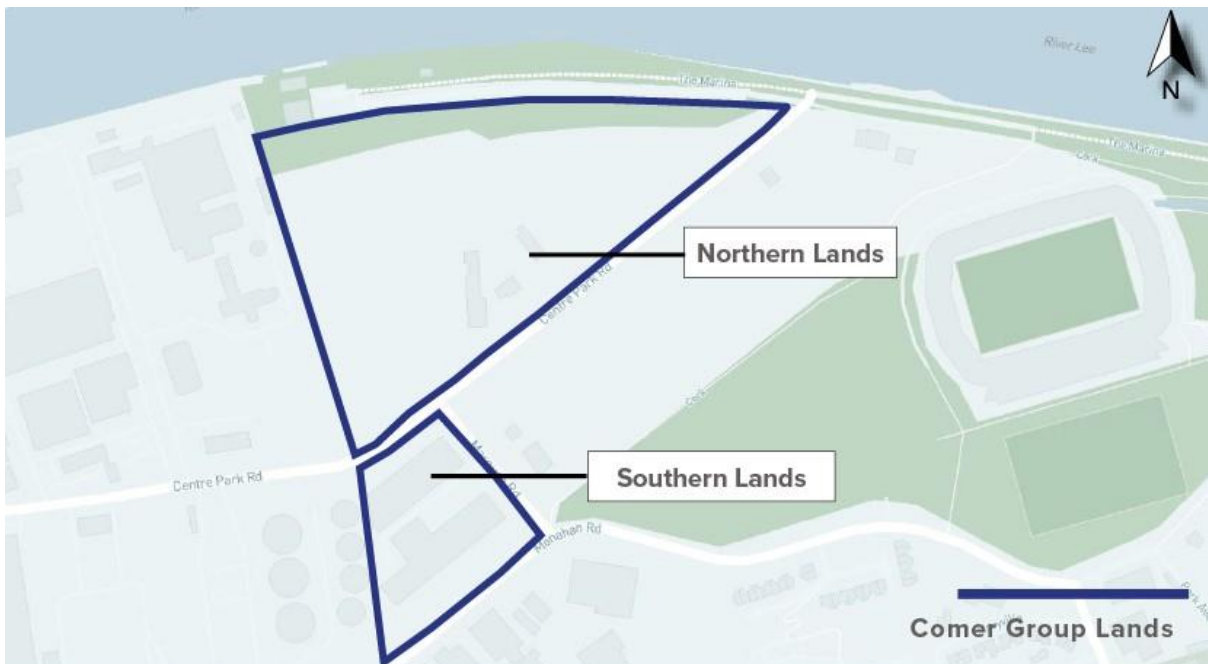


Figure 1 Subject lands for reference

Background & Vision

We refer to our submissions previously made to the Draft Plan process requesting zonings for our lands in the South Docks.

In particular we refer the Masterplan vision for the overall lands which detail how our vision for the lands will deliver:

- A single sustainable location for a schools campus rather than schools on either side of a busy road as is currently proposed under the Draft Plan;
- A school site being made available by Comer Group free of charge to the DOE;
- The delivery of circa 2000 residential units with over 200 affordable housing units and associated community facilities;
- The delivery of the single biggest capital investment in the city upwards of €650 million;
- Sustainable re-use of vacant LDA lands in the South Docks by the DOE and other stakeholders.

For reference phase one of this vision for the Tedcastle site is progressing through planning and is under consideration by the Council and An Bord Pleanala respectively. (www.cityparkshd.com)

Importantly it is also highlighted that since publication of the draft plan we have further engaged with the Department of Education (DOE) on 9th March 2022 to discuss specific land requirements.

For reference as part of our discussions with the DOE it has been determined that there is a potential need to deliver 6no. primary schools and 2no. post primary schools in the South Docks.

We highlight our collaboration with the DOE and also the Masterplan vision on how best to deliver the regeneration of the South Docks provides a number of key benefits:

- The gifting of our southern lands free of charge to the DOE;
- Significant reduction in costs to the taxpayer;
- More expeditious delivery of schools without the need for lengthy CPO's;
- A safer location without need to cross a busy road for both students and parents;
- A more efficient use of land with more and better outdoor 4G playing pitches which can be all weather;
- The provision of 4G playing pitches as part of the schools campus will allow for wider community use outside school hours. Also flood-lit 4G pitches can be used 24/7 365 days per annum, against typical playing pitches which have closed periods during winter conditions and which typically can only be used 4-6 hours per week to avoid surface damage;
- A large set back drop off zone and ample parking;
- Reduced and shared costs of running a multi-unit school campus;
- The delivery of 2000 residential units of which 200 social/affordable units along with associated neighbourhood facilities to include for creches, gyms and public parks.

In summary our design team have set out in detail how the Masterplan can deliver potential school requirements and also the vision of how to deliver the urgent need for new homes in Cork City.

However to date the Draft Plan has not fully facilitated this vision.



Figure 2 Extract from www.cityparkshd.com

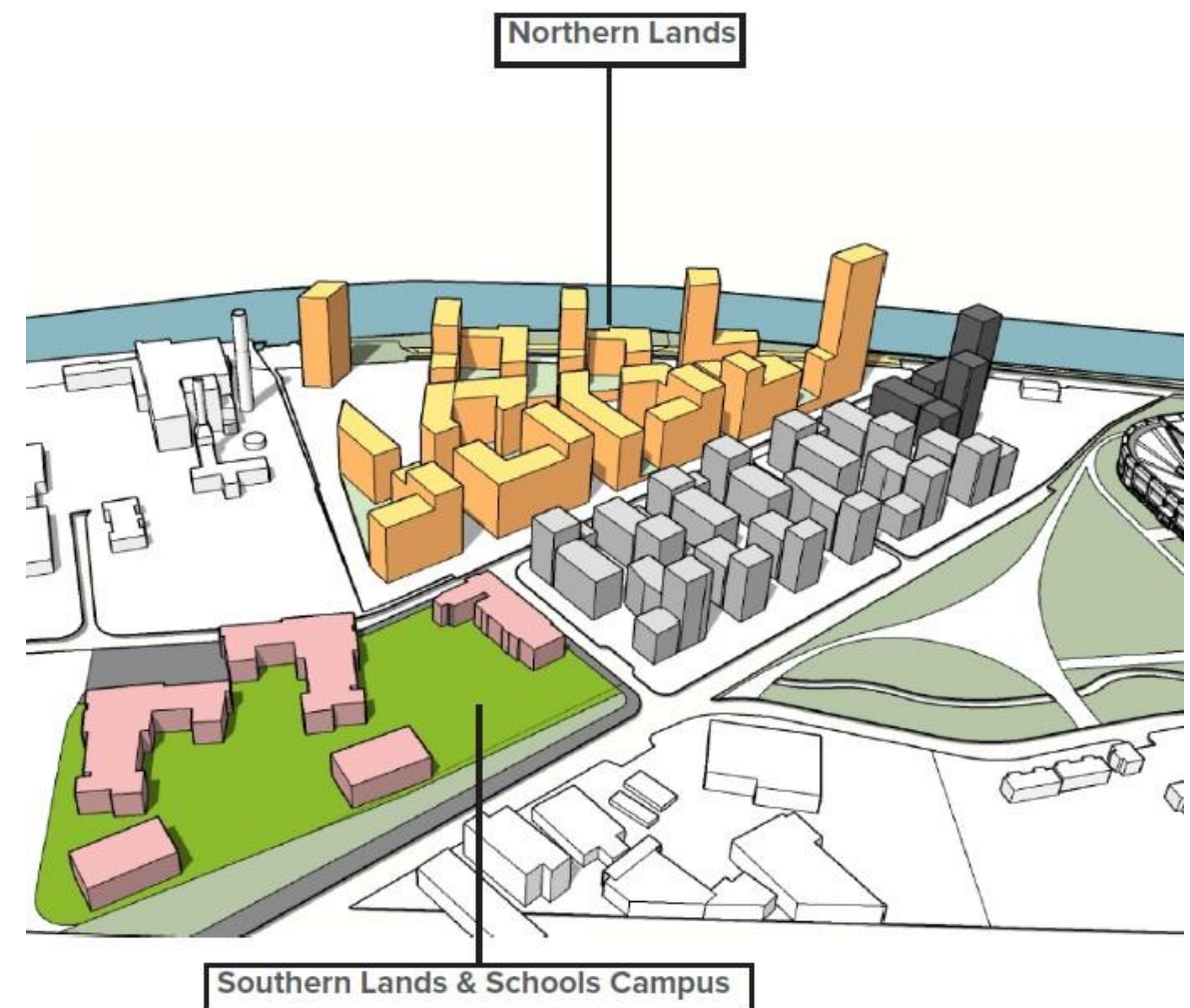


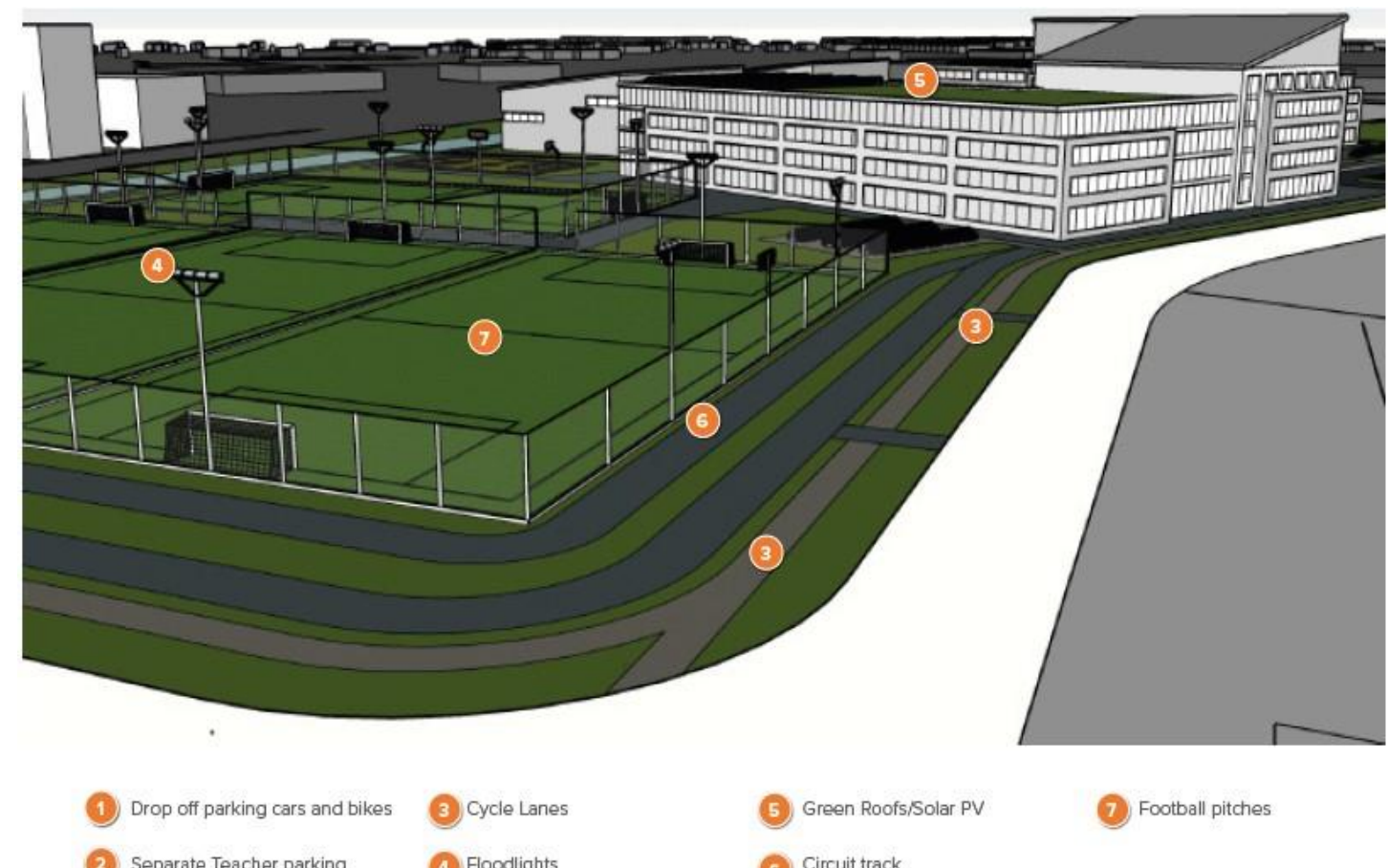
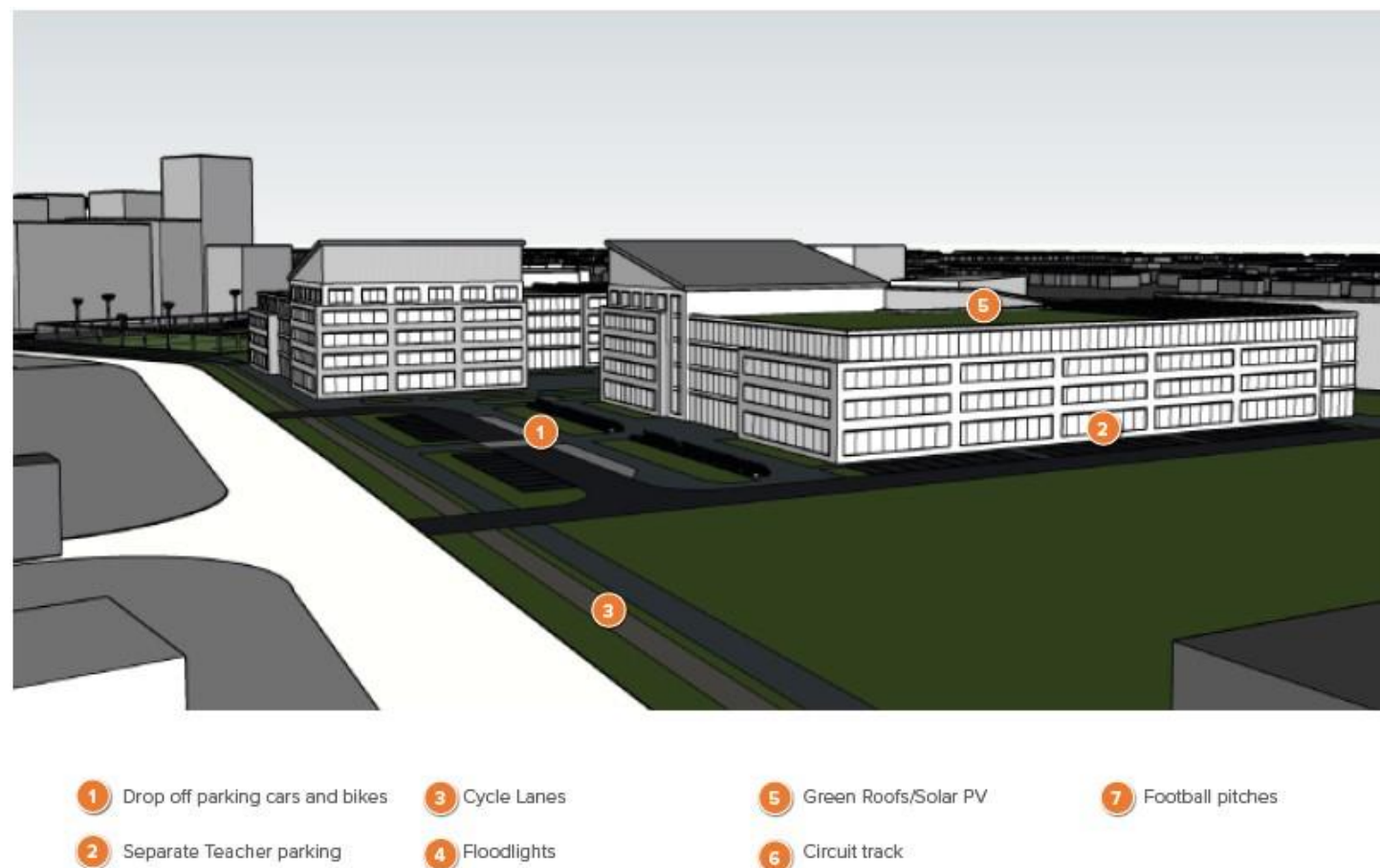
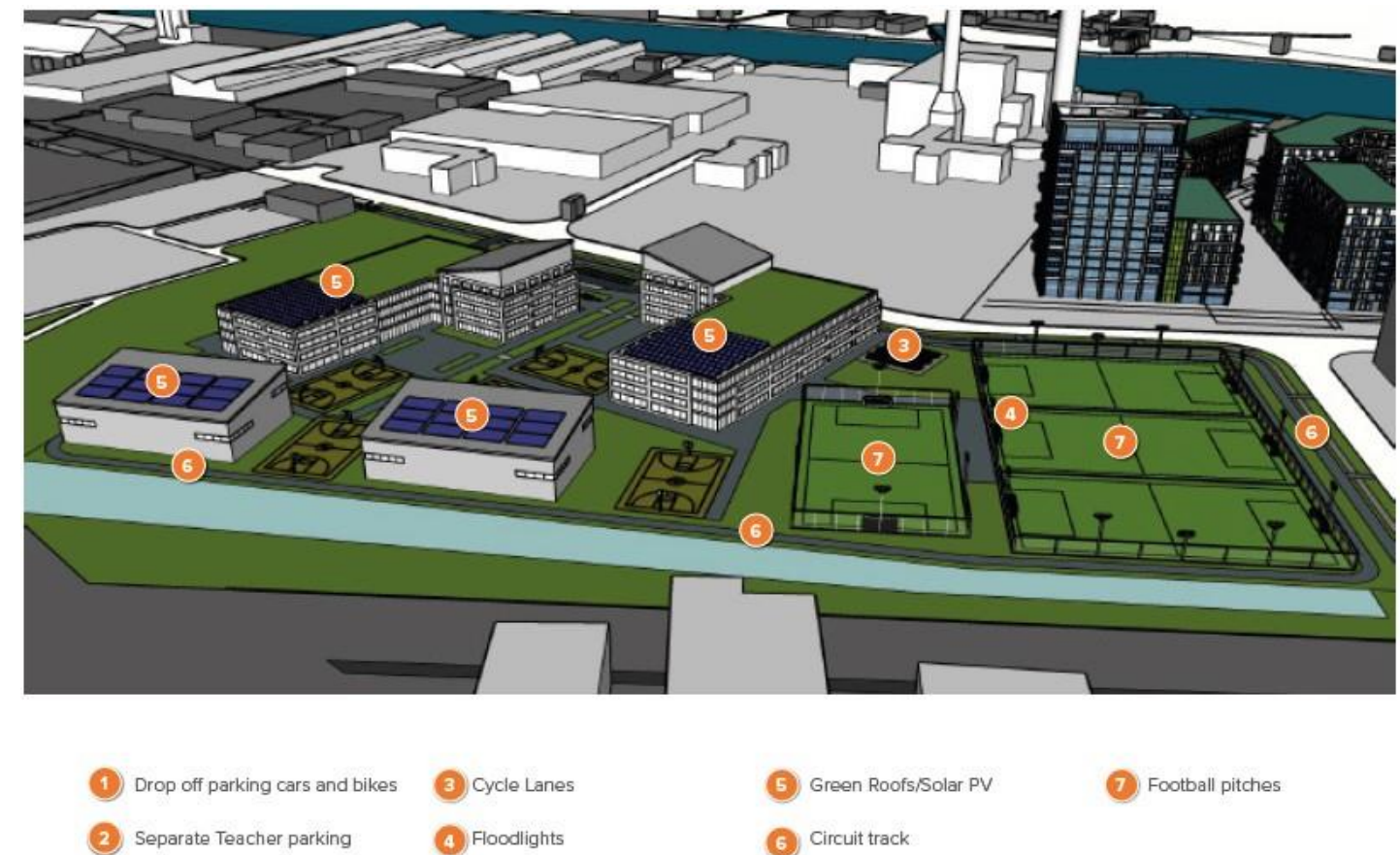
Figure 3 Masterplan for the lands with schools campus and new urban quarter



SCHOOLS CAMPUS

CIRCA 3 ACRES FOR 4G SPORTS GROUNDS AS PART OF SCHOOLS CAMPUS

Figure 4 Extract from our Masterplan for the area and how a schools campus can be delivered on our southern lands and also LDA lands adjacent along with provision of circa 3 acres available for 4G sports grounds as part of the campus



Figures 5-8 Extract from our Masterplan for the area and how a schools campus can be delivered on our southern lands and also LDA lands adjacent

Draft Plan and Material Amendments

The proposed Material Amendments which relate to the southern lands are zoning amendment 2.12 in the Chief Executive's report as below.

Location	Lands at Centre Park Road/Marquee Road, South Docks
Zoning Proposal From	Z0 13 Education and Z0 17 Sports Grounds
Zoning Proposal To	Z02 New Residential Neighbourhoods and Z0 13 Education



Figure 9 Extract from proposed Material Amendments map booklet (part 2)

On review we highlight this Material Amendment has the potential to prejudice the delivery of a school site on the southern lands as the zoning Z02 'New residential' proposed for the eastern portion of the lands.

Therefore as part of our collaboration with the DOE we request the entirety of these southern lands be zoned as Z013 'Education', in conjunction with our amendments sought for the northern lands as below.

Northern Lands

To facilitate zoning amendments to the Southern Lands it is also necessary for the Northern Lands to be addressed concurrently so that the delivery of both schools and residential units are brought forward together.

Under the Draft Plan land use zonings are highlighted for reference.



Figure 10 Comer Group and LDA lands as per Draft Plan zonings which proposes 4.05ha for schools in 2 separate parcels on either side of Centre Park Road

In response we request draft zonings as part of the overall Material Amendments process are amended as per map below.













Figure 11 Comer Group and LDA lands with requested Material Amendments which also delivers 4.05 ha for schools in a single campus

Other matters

We highlight the following key matters:

- Material Amendments as per this submission can be facilitated in a manner that will ensure the same quantum of lands zoned for schools and use by the DOE.
- Our proposal will also enable 4G Sports Grounds to be provided as part of the Schools Campus on our lands.
- The engagement between Comer Group and the DOE is fully accommodated into our proposals in a manner that will allow the potential for all future school requirements in the South Docks to be delivered.
- The Material Amendments will represent significant savings for the DOE in the order of €15 million via zonings requested as a site for a school will be gifted by Comer Group on the southern lands free of charge.
- The adjacent land owner (Land Development Agency) have set out a commitment in their submission to the Draft Plan to work closely with the Council and other key stakeholders in the area. It is therefore appropriate to utilise LDA lands (state owned) to achieve a vision for school provision that will achieve significant savings to the tax payer.
- The provision of 4G playing pitches as part of the schools campus will allow for wider community use outside school hours.
- The acute shortage of housing units in Cork City is again highlighted.
- To summarise how our Masterplan and overall zoning requests are justified and will achieve proper planning for all stakeholders we summarise key benefits and disadvantages below.

Option A: Comer Group Masterplan & Zoning Requests	Option B: Current Draft Zonings
 Delivery of 2000 residential units, neighbourhood centres, creches, public open parks	 The delivery of Comer Group proposals and the socio-economic benefit to the City will not be achieved
 Capital investment in Cork City of 650 million and a multiplier effect upwards of 2 billion in the City based on ESRI studies on how construction investment is recirculated	 The investment will be reduced by 350 million & the multiplier effect reduced accordingly
 A school site being made available by Comer Group on the southern lands and collaborative delivery of a school with the DOE	 Collaboration with Comer Group will not be achieved. Cost of acquisition of lands will be via CPO at a cost of circa 35 million
 A sustainable location for a schools campus in the docklands area along with LDA Lands which will not compromise the delivery of residential units, creches, public parks, neighbourhood centres and not jeopardise a 650 million investment in Cork City	 A dispersed schools campus will be at a location which will be incompatible with residential units via overlooking A location that is not as accessible for the wider area
 Sustainable use of vacant LDA Lands for a schools campus which are state owned and will result in significant cost savings for DOE	 Cost of acquisition of Comer Group lands & no cost savings for DOE

Yours sincerely,



Ronan Woods
Planning Director
Comer Group Ireland