



28 April 2022

Development Plan Submissions  
Strategic and Economic Development  
Cork City Council  
City Hall  
Anglesea Street  
Cork T12 T997

**Re: Draft Cork City Development Plan 2022 - 2028**

Dear Sir/Madam,

The Department of Education wishes to make the following submission to the proposed material alterations to the draft Cork City Development Plan 2022-2028.

The items covered are:

- Material amendment 1.67 regarding Schools Table
- Material amendments 2.12, 2.13, 2.14, 2.16, 2.17 & 2.26 regarding City Docks education campus sites
- Material amendment 2.64 regarding Ballyvolane education campus site

**Material amendment 1.67 re Schools Table**

The Department confirms the information contained in this amendment

**Material amendments 2.12, 2.13, 2.14, 2.16 and 2.17 re Cork City Docks**

Cork City Docks adjoin Cork City Centre. The draft City Plan classifies both the Docks and the City Centre as Strategic Consolidation and Regeneration areas. The significant population increase planned for both areas will generate anticipated additional school place requirements in both areas and there are also population increases planned for the other surrounding suburbs. Cork City Docks is currently a brownfield area with no schools and a planned residential population of 25,000 people. The Department has made its own assessment of potential latent capacity within the surrounding network of schools. It is established that there is minimal, if any, capacity available in the surrounding network to meet the requirements arising from the potential growth through intensification of settlement in those communities, and certainly nothing of the scale to provide for any displaced school places that are not provided for in the City Docks.

The draft plan states that the 147 Ha City Docks has the capacity to accommodate c.10,000 homes and a residential population of between 22,500 and 25,000 people which is approximately 20% of the population growth target for Cork City to 2040. It is stated to be a strategically significant new sustainable residential neighbourhood, an extension to the City Centre with a strong economic role and a sustainable green lung for Cork. It is a first for the country. Schools are a critical infrastructure for the new dockland development if

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the future children living in the City Docks development are to have the possibility of attending school in their local area. Schools are therefore a strategic priority. The current Cork City development Plan 2015-2021 contains three designated school sites in the City docks. The draft plan for 2022-2028 retained the same three sites with some minor re-configurations. The school site areas proposed in the draft plan were:

Site 1 Marina Quarter [former Tedcastles Site] in the area of 2.5 Ha.;

Site 2 Canal Walk (North) [part of former Goulding site] in the area of 1.5 Ha;

Site 3 Monahan's Quay (North) in the area of 1.5 Ha.

The Department submitted analysis and recommendations to the draft plan on 4th October 2021 and supplemented this with an addendum submission to the Chief Executive's Report on the draft plan consultation on 17 December 2021.

In considering the draft plan, the Department examined the capacity of these proposed three sites to meet the potential school needs arising from a population of 25,000 people. The proposed school sites are small in traditional design terms for the projected enrolments. The potential school needs are very significant, ranging up to a maximum requirement for up to six 24- classroom primary schools and two 1,000 pupil post-primary schools. In considering the capacity of the sites to provide for school use, the Department envisages an emerging new model of school building with its own specific design requirements, likely to be the first of its kind in Ireland. A high level evaluation on the analysis indicates that, based on optimistic design development through development management planning, that these sites will be some of the most densely and intensively developed schools the Department has encountered. Significantly, in order to provide the full school range of building and internal teaching and learning environment, it is unlikely that the fullest range of external facilities and amenities will be available. That said, the contiguous location and positioning of public open space amenities beside the school sites will mitigate some of that, as well as some innovative and operational adjustments to schools time-tabling to allow equal access to the amenities that can be provided.

The Department's view as articulated in the submission to the draft development plan was that these sites could satisfy the demographic requirements by providing multi-school shared education campuses provided that:

- Each campus is guaranteed the priority use of adjoining community amenities during school hours, enabling the use of these amenities for general community benefit outside of school hours.

This is absolutely critical as none of the school sites is large enough to meet the play and sports needs of the pupils in the City Docks schools. It is vital to understand that the viability of any school in the docks is totally dependent on guaranteed access to adjoining public open space/community sports facilities

- favourable assumptions on parking



- high-rise approach to building designs so that the schools designed capitalise on the Density and Building Height opportunities contained in *Table 10.4: City Docks Residential Density and Building Height*

The Planning Authority is requested to note that there are other statutory processes underway outside this current Phase 3 statutory Development Plan process that could prejudice the future delivery of the necessary schools and school places in the City Docklands. Included in these processes are two recently submitted SHD applications. The first is the FormerCorkWarehouse SHD for 190 apartments (ABP reference 313142) and this adjoins School Site 2. The other is Citypark SHD for 823 apartments on Tedcastle site (ABP reference 313277) and this adjoins School Site 1. The Department accepts that that SHD application process is legitimate in its own right. However if they are successful, and un-amended in favour of Department requests under its planning observations on those SHD applications, then it should be noted that the Department has significant concern as to the ability of this statutory plan as currently proposed, to provide sufficient school places in the City Docks based on the outturn sites zoned ZO 13 based on anticipated population and demographic demand.

The analysis to date demonstrates that in order to meet the potential school needs of the 25,000 residents planned to live in City Docks in the long-term, these three sites are a minimum requirement, and in fact, additional land for schools would be greatly welcomed. If the school needs of the area are to be met within the area, the integrity of these three sites **must** be preserved in order to be positioned to meet the school needs of future families in the City Docks, given the City Council's stated ambition for the City Docks to be a significant new sustainable residential neighbourhood.

In respect of the school sites and the proposed material alterations to the draft plan, the Department's assessment of the combined outcome of proposed material alterations in respect of the three sites is as follows:

Site 1 Marina Quarter [former Tedcastles Site] proposed area unchanged at 2.7 Ha.;  
Recreation need to be met by access to 0.73 Ha of adjacent open public space plus and access to sports hub beside Site 2)

Site 2 Canal Walk (North] proposed area reduced by 0.2 Ha to 1.3Ha;  
While it is a reduction of 0.2 Ha of the proposed area from 1.5Ha to 1.3Ha, nevertheless it is an increase of 0.1 Ha over its size in the current Development Plan. of 1.2 Ha;  
Recreation need to be met by access to 1.9 Ha open space and 0.9Ha Sports Hub.

The Department considers that it can work with the proposed configurations for Site 1 and Site 2 to utilise them for school campuses on the provisos already outlined and also if the proposed SHDs are conditioned so as not to impact on the maximum development of the adjoining school sites.

It is noted by the Department that some Third Party stakeholders have made submissions and observations by way of a rudimentary School Demand Assessment and a purported



feasibility study for all schools development on a simple centralised campus arrangement at the location of Site 2. The Department counters this with the following points:

- (i) School Demand Assessment content cannot be made for the timeline involved here and can only be based on historical or open source information.
- (ii) the feasibility of a centralised campus is based on outdated school accommodation data.
- (iii) transport and movement logistics envisaged in that proposal for up to 6,800 pupils plus teaching staff and parents would, in our opinion, compromise the mobility and transport strategy of the City Docks area.
- (iv) A dispersed neighbourhood based series of school sites is preferred in planning, transport and education terms.

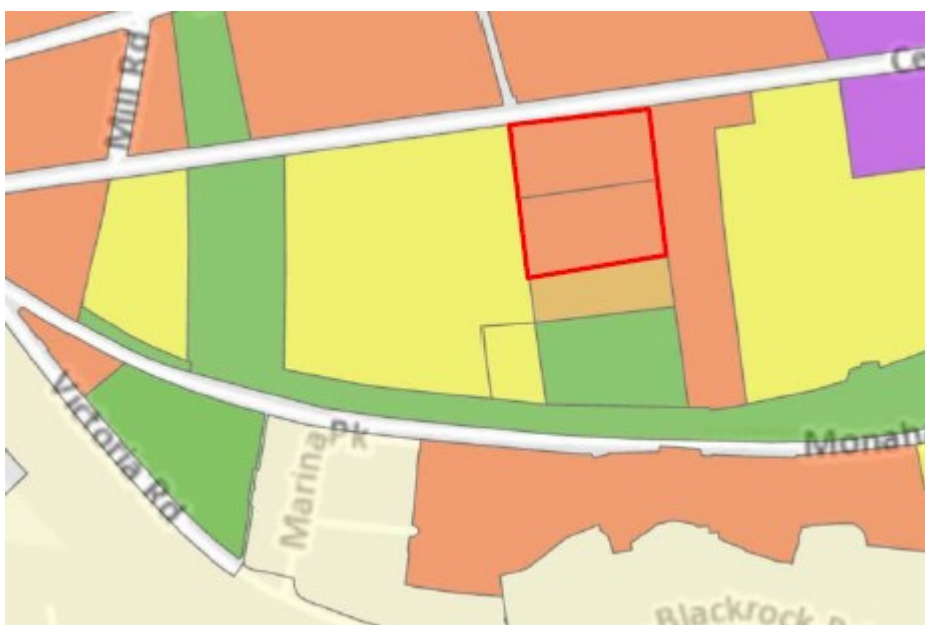
In regard to Site 3, the position is as follows:

Site 3 Monahan's Quay (North) proposed area reduced by 1.1Ha to 0.4Ha;

Material alteration 2.26 proposes to reduce this site to 0.4Ha. The draft Plan had proposed to increase it to 1.5Ha and in the current Development Plan it stands at 1 Ha. Instead, Material Alteration 2.26 proposes to slash this site area to the extent that its capacity to deliver even one school is very compromised, let alone two schools..

Recreation need to be met by access to 1.05 Ha public open space and access to the sports hub beside Site 2

The proposed rezoning is shown outlined in red below.



In conclusion, with regard to the three ZO 13 Education zoned sites in the City Docks the Department requests that the Planning Authority should adopt the following further provisions to ensure the necessary margin of confidence to provide the future schools for the City Docks area:

1. Confirm and embed the use of the adjacent Public Open Space and sports grounds/facilities to the Zo 13 Education zoned sites through a protected and transferable covenant (or other appropriate type agreement) confirming access rights and use of those spaces and facilities by the schools during school hours.
2. Refuse to adopt the proposed Material Amendment MA 2.26 to Education site 3 (west) known as Monahan's Quay which proposes to reduce the Draft CDP proposal to approximately 25% of the original site area. This amendment, if implemented, will be catastrophic to the planning and delivery of necessary schools in the future for the residents of City Docks.

### **Material amendment 2.64 re Ballyvolane school campus site**

This amendment re-locates the proposed school campus site and reduces its area by 2 ha (from 8.5 ha to 6.5 ha). Based on the information available to the Department, the larger existing zoned school site and its location currently appears to be better in terms of the facilities it can provide and access through the SHD consented development. The Department notes that the UEA in Ballyvolane could ultimately have a population of c.10,000 people. A population of this size is likely to result in a requirement for 900 – 1,100 primary school places and about 750 post-primary school places. Hence, this could translate into a requirement for three schools (two primary schools and one post-primary



school). In order to future-proof this requirement, the education campus site would need to be able to comfortably accommodate **two** primary schools and one post-primary school. Given the size of the population to occupy Ballyvolane and the potential requirement for the site to accommodate three schools, the bigger area is beneficial for schools development . The alternative 6,5 hectares site would require 2 additional hectares of public open space to be provided and be managed so that it could be used solely by schools during the school day

The current zoned schools site directly adjoins the area of largest permitted development, Longview SHD (750 units). The development of this SHD is likely to be the first trigger for a requirement for additional school places. A school on the current zoned sites would be directly accessible on foot by the new residents in Longview SHD. This is ideal from all perspectives. Further, there will be no major difficulty with access and services as the development of this SHD will also result in available access and services to the zoned site directly adjoining it. Access and services are critical for the Department in terms of deliverability of a required school in a timely manner to meet the needs of the new population.

The nature of the topography in Ballyvolane is such that development of all sites there will be challenging as the entire area is very hilly. Every building will be on some part of a hill. Two 110kv ESB overhead powerlines traverse the western/southern boundary of the proposed education campus site. The existence of these overhead powerlines would bring a further complexity to developing the proposed school site and have the potential to further reduce the area that can be developed for school use. The upgrade of the Northern Distributor Road will give good access to the alternative proposed school campus site. But it is quite possible that the schools requirement will have materialised prior to this road getting upgraded. Deliverability of the first school will be key to meet the needs of the residents.

In summary, the Department requests the Council not to adopt Material Amendment 2.64 to relocate and reduce the Ballyvolane education campus site. The Department considers that the balance of the public interest is best served by retaining the education zoning as currently proposed in the draft plan for the reasons of site area, location and deliverability.

### Conclusion

The Department of Education requests that proposed material amendments 2.26 and 2.64 are not adopted by the City Council in the interests of being positioned to meet educational needs. The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. The Department wishes to thank Cork City Council for the consideration given to the Department's submission to the draft Development Plan. We look forward to continuing to work with you.

Yours sincerely

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Forward Planning Section