



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

Education Uses in the South Docklands

**Comer Group**

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# 01. Introduction

## 1.1 SUBMISSION PURPOSE & REQUEST

This submission has been prepared on behalf of the Comer Group in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft CDP). Specifically, this submission responds to the Council's draft policies and zoning objectives for the South Docklands pertaining to educational uses which will form part of the Cork City Development Plan 2022-2028.

In terms of background HW Planning prepared a strategic-level submission in regard to the School Zoning objectives within the South Docklands area at the Pre-Draft stage. Under our pre-draft submission, it was suggested that a schools need assessment should be carried out for the area having regard to the changing context and that a shared school campus approach that is reflective of the inner urban context and emerging pattern of development of the docklands should be undertaken.

For reference, the extent of lands in our client's ownership are outlined in Figure 1.1 below.

Figure 1.1 Subject Lands outlined in blue



As we detail in this submission and the accompanying masterplan proposals, we consider that the reorganisation and consolidation of ZO 13 – Educational lands in a single area including our client's land holding would represent a more sustainable pattern of development. Also it is our considered assessment that the delivery of a single school campus to serve the proposed new Dockland community and the wider south-eastern suburbs would allow for the efficient sharing of resources in accordance with Objective 3.23 (c) in the Draft Cork City Development Plan 2022 - 2028.

# 02. Planning Considerations

## 2.1 REVISED ZONING STRATEGY TO PROVIDE A SCHOOL CAMPUS DEVELOPMENT

Our Pre-Draft Stage submission highlighted that a consolidated educational campus within the South Docklands should be included in the formation of the Draft Plan. Having regard to masterplans prepared and the extant permission in the area for Glenveagh Homes we submit a consolidated education campus in the South Docklands would represent a more efficient use of lands in an area planned for high density regeneration over the lifetime of the forthcoming Development Plan. We submit a single consolidated educational facility serving the future residents of the South Docklands and surrounding environs is a logical approach and recognise the likely demand for schools, the ambitious population targets for the Dockland and the requirement to make the most sustainable use of scarce brownfield lands.

### 2.1.1 Future School Requirement in South Docks

The South Docks area has the potential to deliver significant residential development over the coming years and it will be important to ensure that this development is accompanied by an adequate level of services and amenities including education provision. In this context we also consider that in assessing this need the Planning Authority should examine the availability of any spare capacity in the existing schools in the area. We have identified a number of schools in the immediate area as follows<sup>1</sup>: (Schools north of the river have not been considered)

Primary School	attendance
Naoimh Antaine	825
Ballinctemple NS	217
Scoil Barra Naofa (girls)	263
Scoil Barra Naofa (boys)	255
Scoil Naoimh Michael	44

<sup>1</sup> Data sourced from myplan.ie

Scoil Ursula	146
Our Lady of Lourdes	243
Naoimh Brid	546

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

As evidenced in the above tables, the area is already served by considerable school infrastructure. We consider that changing demographics in these established residential areas should be considered in assessing potential spare capacity in the coming years.

As the Planning Authority will note, there is emerging evidence to suggest that following a few more years of increasing demand, enrollments in schools are set to decrease. The Department of Education has published figures on regional projections for full time enrolments to primary and secondary schools over the period 2018 - 2036<sup>2</sup>; the data shows that enrollments in the south west 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.**

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

**In light of these projections, we consider that future school needs assessments should consider not only population growth in given areas but also the existing school infrastructure and any spare capacity that may emerge.**

Another consideration in assessing the need for school places in the Docklands will be the housing mix that is delivered in the area. Given the locational context and densities required under planning policy new developments in the Docklands will consist of a significant proportion of 1 and 2-bed apartment in accordance with the permissible mix ranges in the Apartment Guidelines. These housing mixes have been incorporated into the Apartment Guidelines to reflect recent trends in terms of demand for urban housing. Notwithstanding a mix of house types and tenures required for the area to create a sustainable neighbourhood it is anticipated housing in this area will tend to attract a greater number of young professionals and couples than the lower suburban zones of the city. In this context, we consider that any assumptions made in terms of school demand in the Urban Expansion Areas in the wider Metropolitan area will not necessarily hold true in the Docklands.

We note from our recent S247 Meetings with Cork City Council that the Department of Education and Skills (DoES) have indicated a requirement for one if not two post primary schools to serve the area. However, it was acknowledged that the South Docks will have a particular demographic profile and any consideration of school requirements to meet the needs of the area will have to have regard to this.

Our clients are not questioning the need for education provision within the wider South Docks project, but educational assumptions need to be robustly assessed to ensure that the amount of land zoned for educational requirements matches demand and that general assumptions do not result in the sterilisation of strategic lands, more suited to residential and mixed use development.

### **2.1.2 The Draft Development Plan Encourages the Co-Location of Education Facilities**

Our clients welcome the inclusion of Objective 3.23 (c) which specifies that education facilities should *“encourage the co-location of schools as part of education campuses and with other community uses to create community hubs. This could facilitate the sharing of halls, playing fields and courts where feasible”*.

In considering the efficient use of resources the National Planning Policy Framework, 2020 acknowledge the *“co-location of uses and infrastructure such as schools and sports facilities....”* as an example of how to increase the efficiency of lands use. The preference to co-locate educational facilities is also reflected in Circulars issued by the Department of Education who recognise that school developments need to have a flexible response to the pattern of development in the surrounding area. Part 3 of 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, July 2008 provides guidance to Planning Authorities on the location of primary schools and state that the Department of Education and Science will

*“consider the use of multi-campus schooling arrangements in appropriate case, 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”*



In our opinion, the Draft Development Plan has made noteworthy efforts in line with best practice guidance set out in national policy to achieve efficient use of education zoned lands. In this respect, Section 3.58 – 3.59 of the Draft Plan now states that “*If located together or in close proximity to one another, a mix of community uses can act as community hubs where communities can meet but also where facilities can be shared for these uses, thereby making them more viable and efficient both in terms of the amount of land required (due to the potential of sharing facilities) and maximising their usage across mornings, afternoons, evenings, weekends and holidays. Importantly, this approach also supports synergies of the services provided and ease of access and identity of the services to the public.*”

*This is particularly relevant to the co-location of schools and community centers where if designed flexibly, there is scope to share space for meetings and events and playing fields/facilities outside of school hours/term. In the process, it reduces the amount of land and supporting infrastructure that would otherwise be required if they were independent facilities whilst also reducing capital costs and operational costs. In an international context, community hubs are more commonplace where they often comprise a range of uses beyond schools and community centres.”*

Notwithstanding the above, despite the Draft Development Plan recognising the benefits of encouraging the co-location of schools by forming a single flexible campus as stated in Objective 3.23 (c) we submit this approach has not been reflected in the zoning designation of lands in the South Docklands.

For reference we highlight that there are 3 no. solitary parcels of Objective ZO 13 – Education zoned lands in the South Docklands located to the north and south of Centre Park Road (measuring 2.3 ha, 1.4 ha and 1 ha respectfully). The physical separation of these sites will significantly impact the potential for efficient sharing of resources as envisaged in the Draft Plan particularly when considering the logistics of moving school children from one site to another to utilise various resources i.e., sports halls, libraries, etc.

Extracts from the relevant land use zoning maps from the currently adopted Cork City Development Plan 2015 – 2021 and the now proposed Draft Cork City Development Plan 2022 - 2028 are provided opposite for comparison.

On review we note that the currently adopted ZO 18 – Schools objective is referred to as ZO 13 Education in the Draft Plan. It is also noted a quantum of land has been rezoned from ZO 16 - Mixed Use to ZO – 13 Education.

## KEY POINTS

- We consider that the provision of 3 no. separate parcels of lands, in multiple landholdings, is not the interests of sustainable development. The segregated allocations of designated educational land uses are a significant shortcoming in the Draft Plan and has the potential to have profound impacts on the delivery of a new city quarter. We consider that the lands to the south of Centre Park Road are the most suitable for the delivery of an educational campus.
- We submit that there are no detrimental material planning considerations that would prevent the development of a single educational campus in the South Docklands where the sharing of facilities and resources could be achieved. The key constraint in facilitating the achievement of Objective 3.23 (c) is the designation of ZO 13 – Education lands in 3 no. separated sites rather than on a single site.

Figure 2.1 Cork City Development Plan 2015 – 2021

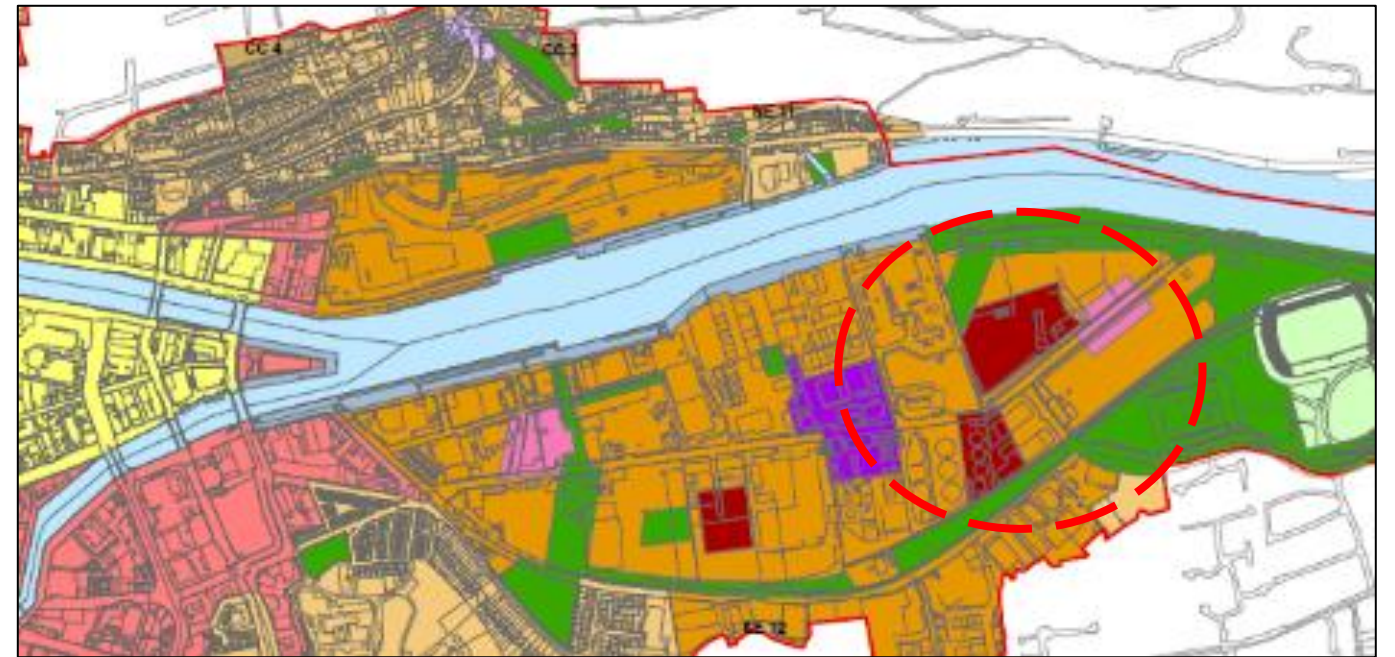
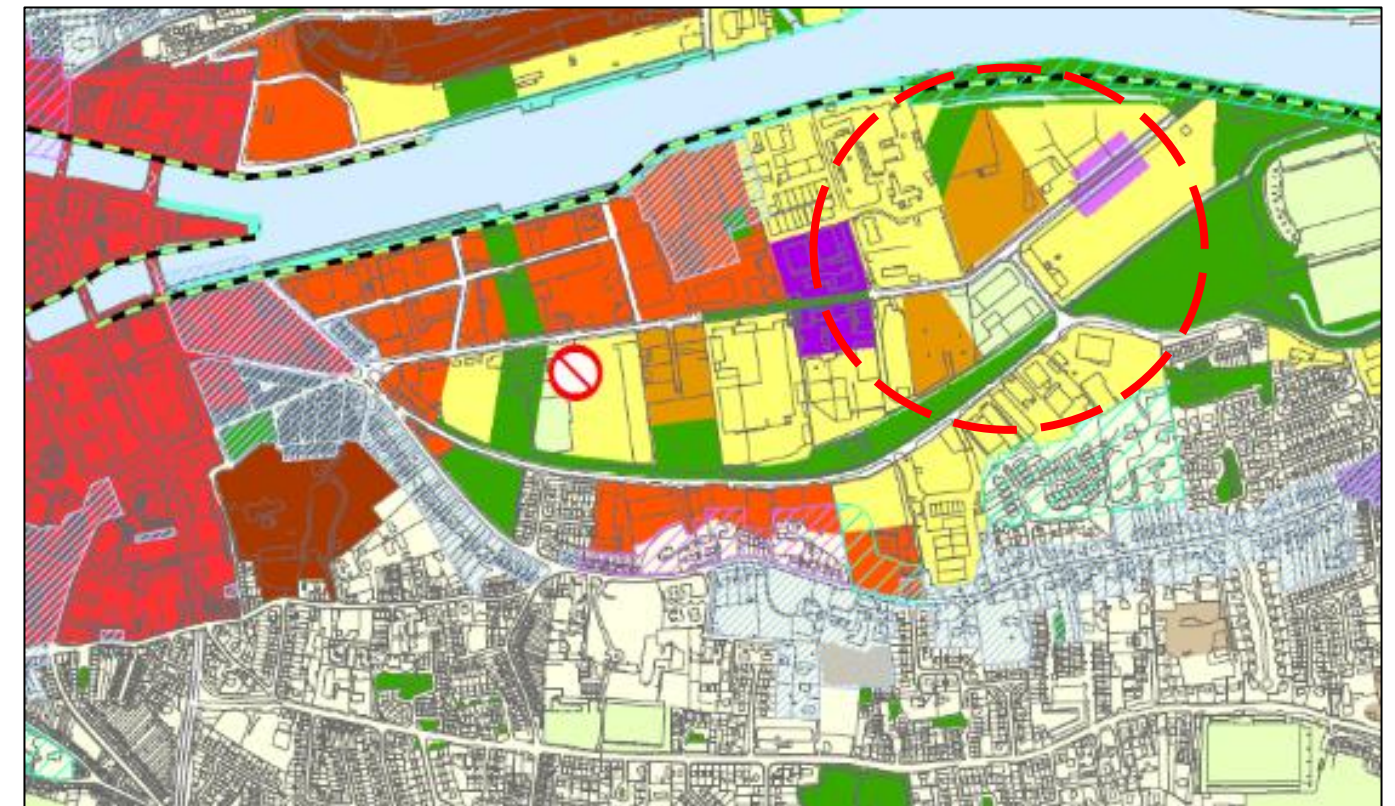


Figure 2.2 Draft Cork City Development Plan 2022 -2028





- To demonstrate how our analysis is supported we refer to the enclosed booklet prepared C+W O'Brien Architects which illustrates how a consolidated approach to the designation of ZO 13 – Education lands can be better integrated with the wider surrounding South Docklands Area.
- In summary, we submit the preferred designation of education zoned lands would include:
  - » (i) The rezoning of our client's lands to the north of Centre Park Road from ZO 13 - Education to ZO 16 - Mixed Use; and
  - » (ii) The rezoning of our clients' lands on the southern side of Centre Park Road from ZO 17 – Sports Grounds and Facilities to ZO 13 – Education.

As detailed below these requested zoning provisions will be more appropriate to achieve the wider master planning objectives for the area, along with appropriately positioning potential educational facilities on lands to the south of Centre Park Road which are better suited in locational and land use terms.

Also of particular relevance, we highlight that our client is willing to make available the southern lands for educational purposes.

Further to the above, we also highlight that the Development Plans Guidelines for Planning Authorities, 2007 set out the approach required by Planning Authorities in the development plan process. Of particular relevance we highlight the below extracts from the guidelines:

- ***Development plans should be strategic:*** *The development plan must recognise the wider policy context and set out a strategic spatial framework with a clear view ahead in development terms for the area the development plan covers. This spatial framework, while acknowledging wider social, economic and environmental trends, needs to focus on the "big picture" planning issues, possibilities and considerations that will underpin how the development process in that area is to be structured in order to achieve the plan's objectives for the wider community.*
- ***Development plans should be a catalyst for positive change and progress:*** *Substantial retail development and development of educational, health and leisure facilities and other services, offices, enterprise and commercial development will also be needed to cater for the scale of projected growth.*
- ***Development plans should anticipate future needs on an objective basis:*** *Development plans, based on an objective, needs driven assessments of future development requirements including the amount of land that needs to be zoned for particular purposes, will help to build public confidence in the preparation of those plans and their implementation. Zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.*
- ***Socio-Economic Development:*** *The development plan is primarily focused on physical planning issues such as the location of development and the appropriate uses of land. However, this is situated within a context of economic, social and cultural objectives of the wider community. If the development plan process is to be effective and responsive to the wider objectives of society, account needs to be taken of the key drivers of change and of indicators of the need for change.*
- ***The development plan should be responsive to key business opportunities and trends in areas, for example, the need for particular types or locations of land for economic***

*activity, taking into account the requirements of specific economic sectors, such as industry, services, natural resources or tourism.*

### 2.1.3 Suitability of Southern Block

We consider that the lands to the south of Centre Park Road are the most suitable lands on which to deliver an education campus. We highlight key points for reference:

- The southern lands belonging to our client are bound on 3 no. sides by public roads therefore providing better flexibility in the creation of multiple access points that can take advantage of the proximity to public transport and the Passage West Greenway via Marina Park.
- The central location between Centre Park Road and Monahan Road will also provide an opportunity to promote sustainable modes of travel to the campus by foot or by bike.
- The access corridors to the southern lands can better distribute traffic from the southern lands and will prevent congestion along Centre Park Road from the suburban hinterlands.
- We refer to the Cork Metropolitan Area Transport Strategy which identifies Centre Park Road for a proposed Light Rail Transit Corridor. Section 4.21 of the development plan guidelines under Mandatory objective 2 states *“Proposed transportation corridors should be identified and protected.”* The location of school(s) on the southern lands is wholly consistent with this objective to protect Centre Park Road. The southern lands could provide alternative routes/access points for suburban parents travelling to the school campus by car therefore avoiding congestion along Centre Park Road where turning movements would inhibit the future light rail operational efficiency.
- The provision of school(s) on the southern lands is more appropriate in terms of not being directly overlooked from multi-storey apartment blocks. Security of children in a designed ‘campus setting’ is better provided for as recognised in site planning and best practice for school design.
- There is no conflict from noise associated with playgrounds affecting the amenity of directly adjacent residential units.
- The provision of a school campus in a single parcel on the southern lands will lead to better master planning objectives and public realms. Purpose-designed residential zones are better achieved when a strategic land parcel such as our client’s northern-lands are not compromised by a school campus.
- We refer to our client’s master plan for their lands prepared by C+W O’Brien Architects. As can be noted from the design proposals, the vision is to create a new urban quarter feeding into a variety of cafes, restaurants, urban spaces with strong connections through the lands. The provision of educational uses in the middle of this purpose-designed zone will create a ‘void’ where the masterplan is segregated and connections to the neighbouring Glenveagh Lands are disrupted.

Figure 2.3 Proposed Zoning Map



On the basis of the aforementioned rational, we submit the Draft Plan has not fully considered issues of land ownership and deliverability of schools fully in the zoning of educational lands.

Notwithstanding that we have identified the potential for c. 4.1 ha of educational lands in a single block that can be developed as an educational campus, we submit that our client's southern lands (c. 1.6 ha) have the capacity to develop a standalone school. This zoning designation would also better facilitate for the remainder of the educational lands to developed on a phased basis on lands directly adjacent and west as demand is identified above.

We request that the ZO13 – Education zoning designations currently within our client's landholding are amalgamated to form a single entity where a school campus can be delivered to meet the needs of the South Docklands and environs. Our client recognises the vital role of educational uses in the delivery of sustainable urban neighbourhoods which can be achieved through a consolidated approach in accordance with national policy and the now Draft Plan Objectives.

C+W O'Brien Architects set out that *"It is envisioned that, building two schools on adjacent lands, with a capacity of 1000 pupils each could facilitate the requirements of the area plans. By relocating the school zone, outlined in the development plan it would enable a green space, buffer zone between the residential development proposed and the school."*

This would further ensure the safety and security of school children and avoid the conflicts which inevitably arise where schools are located close to residential areas. These conflicts are exacerbated when schools have to be integrated with high density residential development.

The reorganisation and consolidation of ZO 13 – Educational lands in a single area within our client's land holding would in our opinion represent a more sustainable pattern of development. The delivery of a school campus would allow for the efficient sharing of resources in accordance with Objective 3.23 (c) in the Draft Cork City Development Plan 2022 -2028.



## 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 future adoption of the Cork City Development Plan represents a significant opportunity for the delivery of a new urban quarter in the South Docklands. In recognising the opportunity to deliver a more sustainable pattern of development, we consider that the future educational requirements of the area should be subject to a bespoke demographic assessment given its unique profile and that general assumptions don't result in the sterilisation of strategic lands.

Once the education need is accurately established, we consider that there is a significant opportunity to deliver a more efficient school campus through the consolidation of ZO 13 – Education designated lands in the South Docklands.

As detailed in this submission the consolidated approach to provide the co-location of schools and a school campus would support the principles of compact growth that would be reflective of the “transformative” urban environment that is envisaged in the South Docklands.

Going forward as part of the 2022-2028 CDP we request:

- The rezoning of our client's lands to the north of Centre Park Road from ZO 13 - Education to ZO 16 - Mixed Use; and
- The rezoning of our client's lands on the southern side of Centre Park Road from ZO 17 – Sports Grounds and Facilities to ZO 13 – Education.

As detailed above, these requested zoning designations will be more appropriate to achieve the wider master planning objectives for the area, along with appropriately positioning potential educational facilities on lands to the south of Centre Park Road which are better suited in locational and land use terms.

Figure 3.0 Proposed Zoning Map





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