



16 May 2022

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

Ref: Case no – 313277 Former Tedcastles Yard, Centre Park Road and the Marina, Cork (www.cityparkshd.com)

Dear Sir/Madam,

I refer to the SHD application 313277 that was submitted by Tiznow Property Company Ltd in respect of lands at the former Tedcastles Yard, Centre Park Road and the Marina, Cork City. This application is a proposed development that, if permitted, will allow for the development of 823 residential units (apartments).

The Department of Education would like to make an observation as a prescribed body to this SHD application in respect of the proposed school site which directly adjoins the proposed development

Background and Context:

As you will be aware this site forms part of the proposed extensive lands known as the Cork (South) City Docks which is the subject of a current statutory process for the Draft City Development Plan 2022 -2028, being a masterplan area within the Development Plan. This plan classifies the City Docks as a Strategic Consolidation and Regeneration area for Cork City. Cork City Docks is currently a brownfield area with no schools and a planned residential population of 25,000 people.

It is noted and acknowledged that this SHD-313277 application is made under the current Cork City Development Plan 2015-2021. The current plan contains three designated school sites in the City docks. The draft plan for 2022-2028 has 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.;

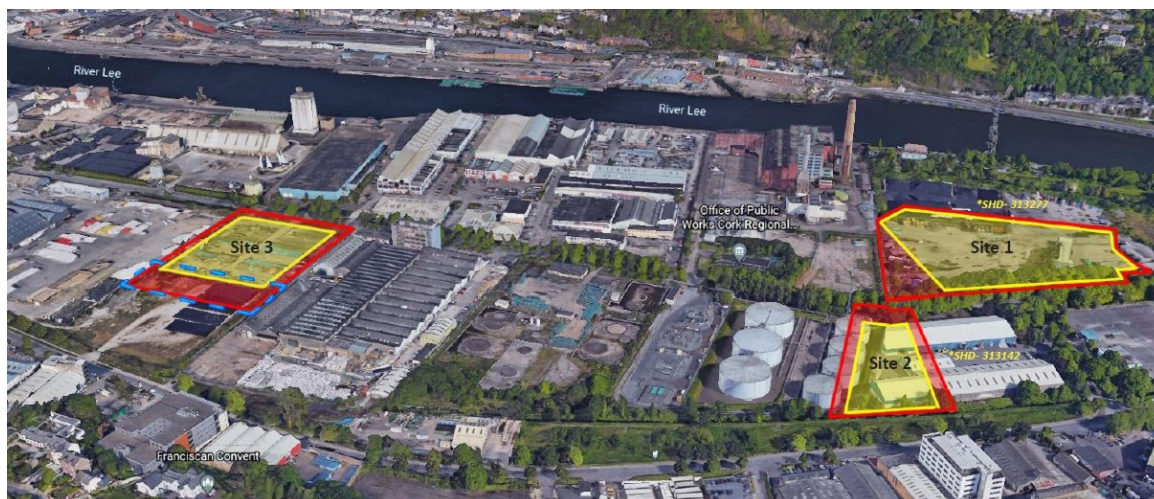
Site 2 Canal Walk (North) [part of former Goulding site] in the area of 1.5 Ha;

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



An Bord Pleanála is requested to note that the SHD-313277 application site is immediately contiguous to the northern and eastern boundary of Site 1 referenced above and is therefore materially affected by this application. The Board is also requested to note that the draft Development Plan 2022 -2028 retains the same three school sites as the current 2015-2021 Plan, but for an increased projected population of 25,000 people.

Below for reference is an image of the proposed three school sites in the draft DP:



Above: Aerial Photograph – Cork City Docks (part) showing DCDP 2022 - 2028 education sites (ZO 13). Red indicates gross site area.

Yellow indicates net site area.

Blue indicates proposed Material Alteration (reduced education zoning ZO 13)

*** SHD 313145 site location (east of Site 1); SHD 313277 location (north of Site 1)**

- 1. Site 1 (East) Marina Quarter;**
- 2. Site 2 (Centre) Canal Walk;**
- 3. Site 3 (West) Monahan Quay**



Comprehensive and Incremental Planning approach to schools provision in the current City Development Plan 2015 – 2021 and draft City Development Plan 2022 – 2028:

An Bord Pleanála is requested to note that there are multiple parallel statutory processes underway in the City Docks that could prejudice the future delivery of the necessary schools and school places in the City Docks

1. **Draft City Development plan 2022 - 2028:** 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; and finally on the Proposed Material Amendments on 28th April 2022.
2. **SHD-313142 Former Cork Warehouse Site:** for 190 apartments (ABP reference 313142) which adjoins School Site 2. The Department made a submission to the Board on this SHD application.
3. **SHD-313277 Citypark SHD (Former Tedcastles Site):** for 823 apartments on Tedcastles site (ABP reference 313277) which adjoins School Site 1. This letter contains the Department's observations and requests on this SHD application.

The Department accepts that the SHD application process is legitimate in its own right. However if these SHD applications 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 the combination of parallel statutory planning processes to provide sufficient school places in the City Docks based on the outturn sites zoned ZO 13 based on anticipated population and demographic demand.

Under the provisions of *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages (2009)*, An Bord Pleanála will be only too aware to the critical nature of providing schools particularly in plan led communities. The Department is tasked with ensuring that projected future education and school places can be provided within the designated sites in the CDP, DCDP and any associated SHD applications. Therefore the Board is requested to acknowledge the need to link these separate and incremental applications to the overriding strategic and comprehensive planning need to ensure sufficient school places when required in the future. Therefore the Department requests the Board implement the following requests and recommendations under the provisions of the Act.

Cork City Docks adjoin Cork City Centre. The current CDP 2015 - 2021 and the draft CDP 2022 - 2028 classify both the Docks and the City Centre as Strategic Consolidation and Regeneration areas. As stated above though, there is significant population increase planned for both areas under the draft CDP which will generate



anticipated additional school place requirements in both areas and there are also population increases planned for the other surrounding suburbs.

The Department has made its own assessment of potential latent capacity within the surrounding network of schools and it is established that there is minimal, if any, capacity available for some potential growth through intensification of settlement in those communities, but certainly nothing of the scale to provide for any displaced school places not provided for in the City Docks.

The draft CDP 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 and therefore are of strategic priority.

In considering the draft plan, the Department examined the capacity of the 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:

- (i) 6 no. 24- classroom primary schools, and
- (ii) 2 no. 1,000 pupil post-primary schools.

Emerging Urban School Model:

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.

Key design and operational changes will need to be made to the traditional school archetype; including taller schools in terms of storey/floors numbers than previous; re-organisation and re-distribution of key school accommodation across those additional



floors to ensure an operational efficiency and fluidity to allow teacher and pupils make timely progress between learning periods; reduced onsite outdoor play and physical education amenities, and/or provide them in other ways (rooftop, or defined access to adjacent public amenities and facilities for priority school use during school hours). The urban location will also ensure a favourable shift away from private car transport with an elimination of the need for onsite car-parking in the main thereby allowing for smaller site area, and/or an improved prioritisation for educational and amenity facilities.

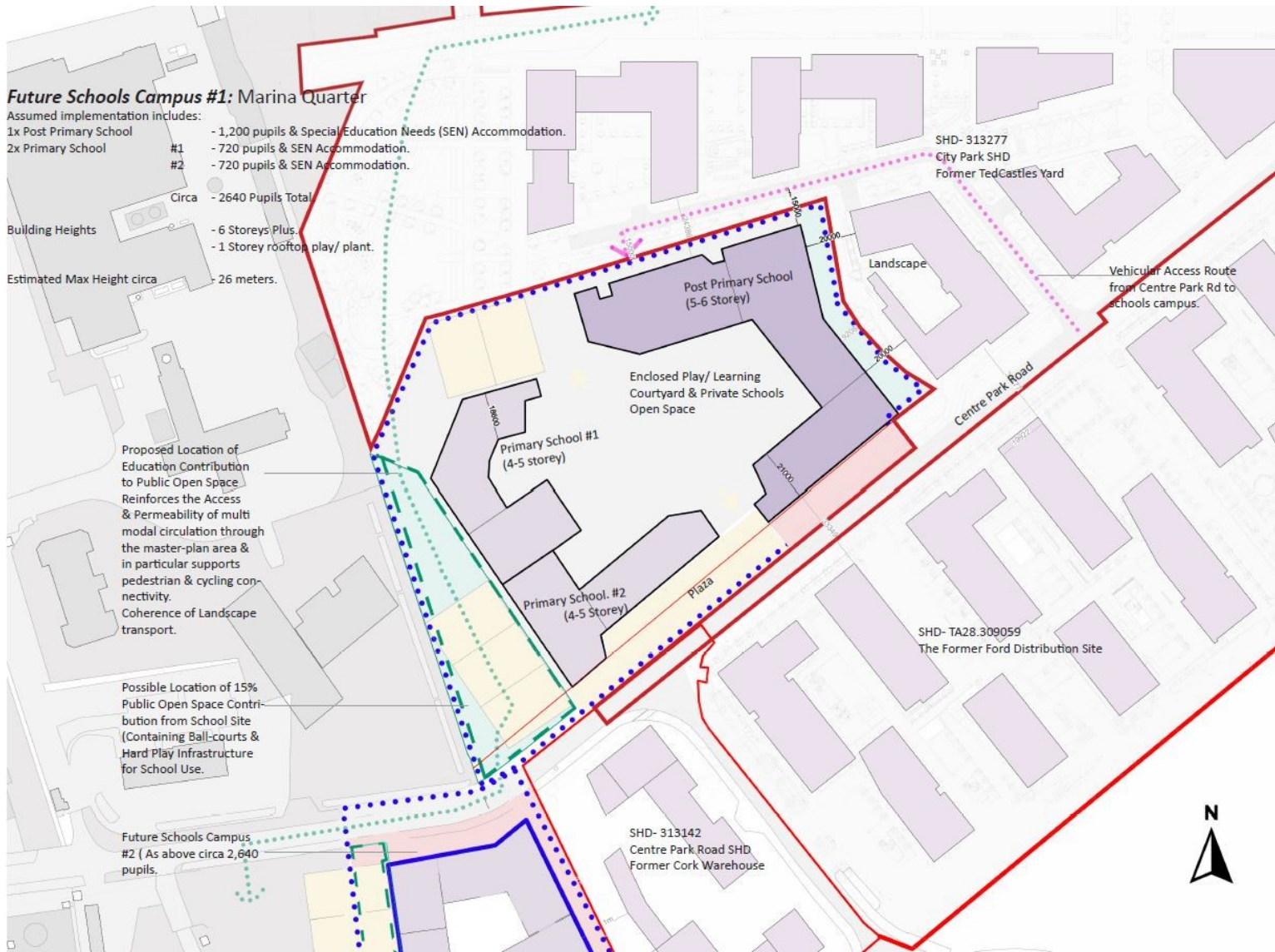
Consultation with Applicant:

A meeting took place between the Department and the Applicant on 9th March 2022 (minute attached). The applicant requested the meeting to discuss their development proposals in regard to this present SHD for 823 units (ABP reference 313277) and SHD 313142 for 190 units on a nearby site, partially owned by the applicant. Both SHDs are contained in landholdings which contain a site with an educational zoning in the current Cork City Development Plan 2015-2021 and the proposed draft Cork City Development Plan (2022-2028). At the meeting, the Department outlined its projected potential school requirements in Cork City docks, namely between 4 and 6 primary schools (24 classroom schools catering for 600 pupils each) and two post-primary schools (1,000 pupil schools). Subsequent to the meeting, the Department forwarded the applicant standard school schedules of accommodation for primary and post-primary schools, in order to enable them to test an alternative scenario they proposed for schools development in Cork City Docks. The intention was to establish a mutually beneficial site layout that would enable the applicant proceed with their SHD applications, allow the Department to provide support to the applications, and ensure that the Department will be able to develop the schools lands/sites in the future with a degree of certainty. The Department has not received any follow-up correspondence.

SHD-313277 Indicative School Proposal (Dwg No.:0106):

The SHD application contains a drawing titled Indicative School (**Dwg. No.:0106**). It indicates four schools on the schools site, 2 no. primary schools and 2 no post-primary schools, all possibly with special needs accommodation. The applicants proposed school campus is based on inaccurate school sizes and an over-development in both school and pupils numbers. An Bord Pleanála is requested to refer to the Departments drawings contained in this document showing 3 no. school on the school site SHD-313277. The Departments drawings represent the appropriate footprint for 3 no schools at the SHD site. The Department has already indicated that to successfully deliver future school needs in these locations that adjacent public open space, lands and facilities are needed to provide for the numbers of pupils.

Therefore the Applicants proposal is an over-development in schools term. See below.





Conclusion:

It is not the intention of the Department of Education to interfere with the appropriate provision of houses/homes. Rather, as a key stakeholder in the provision of sustainable communities envisaged in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages (2009)*, as well as successive CDP's the Department is only concerned with being able to provide the necessary educational services to sustain the citizens and residents in their communities.

It is clear that in order to provide the fullest level of accommodation across the Cork City Docklands the Department needs to realise a high level of development density on each of its education zoned sites, in this case Site 1 (east) Marina Quarter which lies to the south and west of the subject SHD-313277 site.

The Department asks the proactive support of An Bord Pleanála to protect the strategic development of the school site, by conditioning any grant of approval so that the current SHD proposal will not prejudice the future development of the schools site and will, through specific guidance, wording and limits establish an acceptable building line for the schools development no greater than 20m off the nearest point of the SHD building as proposed in this application for an anticipated school building height equivalent to six storeys and an estimated school development height of 26m in height. Any subsequent setting-out errors of the SHD development that might move the buildings closer to the schools will be superseded back to the intended building line in planning.

This (these) condition(s) shall be suitably worded to require all and any successor planning consents, and/or amendments to the parent consent, and or any successor applicant, or resident, or property owner/management company to preserve this agreement through covenants and other appropriate legal mechanisms through mortgage, leasehold and freehold agreements in order to enable the proper and appropriately density of development of new schools in this urban environment.

If you need clarification on any matter contained in this submission, please feel free to contact the undersigned.

Thanking you,

Yours sincerely

Mary Carney

Forward Planning Section



Carney, Mary

From: Carney, Mary
Sent: Tuesday 15 March 2022 10:38
To: 'Ronan Woods'; Lewis, Frank; Fannin, Jill
Cc: William Power | C+W O'Brien Architects; 'jeremy_ward@corkcity.ie'
Subject: RE: Cork Warehouse Site and Former Ted Castle Site
Attachments: Primary SOA 32 classroom 4 SEN Base.pdf; SOA 16 Classroom.pdf; SOA 1200+4 SEN August 2021.pdf; 20220309 Note of meeting between Dept and Comer Group.docx

Hi Ronan

Thanks for our meeting last week.

The matters we discussed are important in relation to adequate school provision in the City Docks Development. Attached is a draft minute of the matters discussed and the context surrounding them. Your observations/comments are welcome please.

In regard to scenario testing, we set out below our position on the development of the schools sites in the Tedcastle site and the Cork Warehouse land holdings and the two scenarios which could be tested by Comer Group. In this regard, attached please find the promised schools schedules of accommodation.

Schools Impact assessment as part of Comer Groups progression of SHDs for Tedcastles site and Cork Warehouse site.

The two sites zoned "education" are currently considered to be the more suitable to establish the greater proportion of the future schools' needs, of the total of three school sites, in the docklands masterplan area.

The following assumptions and principles were incorporated into the viability study for the schools sites design and development. These are considered to be reasonable assumptions based on likely outcome now, but will need to be kept under review for emerging demand as the masterplan area is developed and built-out:

- (i) Implementation strategy: to provide a mix of primary and post-primary in the development of site 1 and site 2. Site 3 assumes two primary schools, but is outside the remit of discussion with the Comer Group.
- (ii) A larger number of individual school units were considered to better facilitate a range of diversity in patronage potential. There are also some sub-variant scenarios that can be considered depending on emerging demand.
- (iii) On-street parking and traffic management; or minimal on-site parking; or semi basement/below podium parking if required. This assumes an elevated podium level to establish a ground floor level above historic flood levels.
- (iv) Multi-storey school buildings up to five storeys (c.3.6M floor to floor heights).
- (v) Roof level: Some rooftop play areas and remainder for possible renewable and other plant and equipment.
- (vi) Use of public open space: Some reduced play and outdoor space assumed on the school sites, to be supplemented by agreed access to proposed adjacent public amenities during school hours.
- (vii) BRE site and environmental design guidelines to be tested for acceptable levels of daylight/sunlight for intensively developed school sites.



<Jill_Fannin@education.gov.ie>

Cc: William Power | C+W O'Brien Architects <wpower@cwoarchitects.ie>

Subject: RE: Cork Warehouse Site and Former Ted Castle Site



Note of Meeting 9/3/2022

Comer Group's proposed development of Cork Warehouse Site and Ted Castle Site (Zonings & Site Layouts) and their correlation with future schools development

Attendees:

Comer Group: Ronan Woods, Planning Director
Barry Comer,
Harry Walsh, (from Harry Walsh Planning)
William Power (C & W O'Brien Architects)
E Ballard (C & W O'Brien Architects)
Lorcan McWilliams, Comer Group

Dept of Education: Jill Fannin, Principal Officer, Forward Planning Section
Frank Lewis, Senior Architect
Mary Carney, Assistant Principal, Forward Planning Section

Cork City Council: Jeremy Ward, Senior Executive Planner

The meeting was convened at the request of Comer Group who are at pre-application stage for SHDs on two sites in their ownership that will need to be formally submitted as SHD applications to An Bord Pleanála (ABP) within 16 weeks of the ABP Opinions if they are to get considered within the deadline of the ending of the SHD process. Both land holdings contain plots of land/sites with an educational zoning in the current Cork City Development Plan (2015-2021) and in the proposed draft Cork City Development Plan 2022-2028. The two sites are:

- **Cork Warehouse Site (Monahan Road)** – pre-application to ABP was submitted on 24/9/21 to construct SHD of 191 apartments and a crèche (ABP Ref 311470). The ABP opinion issued on 9/12/21 stated that the development proposal “required further consideration/amendment” with regard to a range of issues.
- **Tedcastle site (Centre Park Road)** - pre-application to ABP was submitted on 21 October 2021 to construct an SHD of 1,030 apartments and two creches (ABP ref 311723). The ABP Opinion issued on 22/12/2021 stated that the development proposal “required further consideration/amendment” with regard to a range of issues.

Position with the draft Cork City Development Plan (2022-2028)



The draft Development Plan process is well-advanced. The Plan is anticipated to be formally adopted between 27 June to 08 August 2022. The Chief Executive's Report on the draft Development Plan consultation was published on 20 December 2021. The current position (based on the OPR calculator) is that the elected members have to decide to accept or amend the draft development plan by 23 March 2022. The public consultation on the proposed material amendments is due to commence mid-April and conclude by mid-May.

School sites

The draft plan contains three school sites to meet the needs of the new City Docks neighbourhood to be developed in this nationally significant regeneration area. This reflects the land use strategy developed as part of the South Docks Local Area Plan 2008 and maintained through the Cork City Development Plan 2009-15, Cork City Development Plan 2015-2021 and the Draft Cork City Development Plan 2022-2028. The target population for the City Docks in the Draft Plan (see para. 10.25, p313) is for 22,500 to 25,000 residents, This represents an increase of 10-20% over the 2008 population target.

The Department has considered the projected school needs for this population and has estimated that there could be a requirement for between 4 and 6 primary schools (24 classroom schools catering for 600 pupils each) and two post-primary schools (1,000 pupil schools).

The City Docks development is the first of its kind in Ireland as it has the aim to be a vibrant, mixed use socially inclusive quarter. It is acknowledged that as it constitutes apartment living it is not as easy to definitively predict how many families/children will result from occupancy of the proposed housing mix. The Draft Plan Dwelling Size Mix target (set out in Table 11.6 of the Draft Plan) is for the City Docks neighbourhood to include 20% of homes to be 3/3+ beds and 45% to be 2-bed homes. Apartment living is becoming more of a norm now and families are getting smaller.

In the case of all three education sites, the net school site area available is significantly below the average school site size for equivalent pupil numbers. The Department has been engaging with a "stress testing" of the three sites to assess if the maximum potential requirements could be delivered on them by building as many schools in the maximum scenario for school place demand on each site up to the maximum height opportunity of each of the sites within the draft CDP.

The conclusion has been that:

- the maximum number of potential schools required could **not** be provided on the three sites
- the viability of these sites depends on the schools having advance agreement and priority use to avail of the adjacent open public spaces on a structured and dedicated basis during school hours.
- When these schools sites are developed for educational use, all the indications are that the intensity of the proposed use will be over-and-above that seen on other schools sites in Ireland, and will be very urban in nature and need to



significantly depart from standard school models of development in order to deliver the school places required for within the City Docks for the residents.

- The Draft Development Plan and the NPF targets for Cork to 2040 point to the intensification and consolidation of development in Cork City centre areas surrounding the City Docks. This will intensify the pressure for schools needs within the City Docks, City Centre and surrounding school catchment areas. .

Cork Warehouse site proposals

Comer Group showed the Department the indicative masterplan layout of the proposed SHD and an indicative school site layout based on the Adamstown layout. (Adamstown SDZ school site has two 16-classroom primary schools (both two storey) and one post-primary school (three storey).

The Department explained that when considering the City Docks, all the schools were envisaged at a minimum height of 5 stories; that the primary schools were all 24 classroom (not 16 classroom) and that the size of post-primary schools has increased by about 25% since Adamstown CC was built due to improvements in the size of specialist teaching spaces. All of these considerations would need to apply when considering an indicative school layout.

It was noted that the indicative masterplan showed a building line on west of the SHD site to be close to the eastern boundary of the proposed school site. This would have a negative impact and prejudice the Department's ability to intensively develop the school site as required. It may also be necessary to reduce the building volumes surrounding the school site to ensure quality of development and amenity. It was noted that the Comer Group had taken its own value engineering approach to their sites which appears to prejudice the future development of the school sites. The Comer Group are keen to achieve optimum densities on their site taking into account competing design objectives. A balance has to be achieved to meet the requirements of both parties. The Department would be a statutory consultee to the SHD proposal.

Tedcastle site proposal

The Department requested information on Comer's proposals for this site, including massing, building heights, layouts

Other matters

Comer Group asked about the Department's development timeframe for the schools. Notwithstanding the current land zonings Comer Group asked if the Department would be willing to consider alternative proposals (beyond the lifetime of the draft Development Plan, i.e. beyond 2028. The Department responded that its aim is to ensure that there are sufficient lands, properly located and suitably zoned to meet the school needs of the City Docks community in a timely manner. In addition, the Department is reactive to the two drivers for the current site assessments:

- (i) Draft CDP 2022-2028 process and
- (ii) Comer Group's request for consultation in advance of their SHD applications.



Any alternative proposal would have to meet these criteria and be demonstrably in the public interest.

Next steps:

It was agreed that the Department would forward to Comer Group on Friday 11th March the details of the potential school requirements and schedules of accommodation for the Cork Docks site.

Further discussions can then take place.

There is going to be need for co-operation and ongoing collaboration in regard to the City Docks development.

Mary Carney
11/3/2022