



Tracy Armstrong
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02 September 2021

Re: Strategic Housing Development at former De La Salle National School and associated lands, located north of Ballyfermot Road, Ballyfermot, D10

Dear Tracy,

Your proposal regarding the provisions towards a future primary school at the proposed development referred to above are noted and acknowledged. We are grateful for the consultation and information provided to date and you will I am sure acknowledge our written statement regarding the future requirement for a primary school in our letter dated 11th August 2020. We acknowledge that you now intend to make a SHD application to An Bord Pleanála.

The Department considers that in order to secure the facilities for a future school in the area, which will reasonably satisfy the Planning Authority as part of a future application, An Board Pleanála will need to include some provisions to future-proof that school proposal through planning conditions. The Department therefore intends to make an independent formal observation on that basis. See attached proposed draft letter/observation for your information. Two of these provisions we are seeking as conditions are (i) use of the adjacent pitches during school hours as a binding agreement/covenant, and (ii) identification and designation of the school related car-parking through binding agreement/covenant.

In that regard, I would be obliged if you could notify the Department as soon as you lodge your application, and also notify us of the relevant case reference number.

Yours sincerely

Alan Hanlon
Statutory Plans
Forward Planning Section



Appendix: (wording for letter to ABP on foot of SHD application by Armstrong Fenton)

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Ref:

ABP Case Reference No. **XXXXXXX**: Strategic Housing Development at former De La Salle National School and associated lands, located north of Ballyfermot Road, Ballyfermot, D10

Dear Sir/Madam,

I am writing in order to make an independent observation and submission on the above ABP case reference number. As you will be aware, the Department of Education is a statutory consultee to the process and as such no submission fee applies.

The applicant/developer has engaged with the Department of Education through their design team and technical advisors regarding the future education (primary school) requirements arising. The Department of Education determined the need to reserve a primary school site on these lands as a likely requirement, and communicated this to the applicant in our letter dated 11th August 2020. It is acknowledged that it is difficult to determine and project the actual education requirements at this time which will be dependent on a balance of demographic outcomes associated with the development, its implementation and its impact on the wider community.

It should be noted that the school site will not be procured until the projected need is verified. Therefore the Department of Education requests that An Bord Pleanála condition this application with certain provisions that will support the proper and orderly future development of the school under a separate planning application. It is requested that these provisions should be conditioned and explicitly tied to planning compliance, future property transfers, and development construction and management through appropriate and binding agreements e.g., covenants.

An Bord Pleanála is requested to note in any resulting planning consent by way of conditions where appropriate;

- 1. The current design due-diligence for the proposed school site considers a 16-classroom primary school building represented by a two-storey footprint. A 16-classroom primary school typically includes a special education needs accommodation in the target gross internal floor area (GIFA) of circa 3,000m². The*



Department requests that the Board would support a range of future possible school sizes depending on the emerging need at the time. It is requested that An Bord Pleanála would consider a future school development range from 16-classroom school to 32-classroom school, or circa 3,000 – 5,200m². This will not unravel the site area and site provisions discussed with the developer/applicant, but will be achieved through a more intensive planning and development of the school site.

- 2. In order to support this it is necessary to establish a minimum distance to a building-line to the east boundary of the school site, or off the western building line of Zones/Blocks A and H in order to manage expectation regarding any perceived privacy or overlooking from the future school towards what will be then established residential. This should allow the Department to optimise the school site development potential and prevent frivolous, or without substance observations on the future school application, and will give prospective residents of these units the confidence regarding their privacy.*
- 3. The identified school site area is 0.6 Hectares/1.48 Acres. This is substantially below the traditional school site area which contains sufficient independent external amenities and facilities. However there is an acknowledgement that due to the scarcity of land in urban areas it is not always possible to achieve the ideal site size for school buildings. Where some of the elements required for a school site can be provided outside the designated site area (e.g. traffic management, parking, playing fields, etc.), where it is possible to provide multi-storey (above two storey) buildings, and where separation areas can be reduced due to the nature of permitted development on and adjacent to the site; then smaller sites as in this case can be considered. The school building is intended for a circa 500 -1,000 pupils and understandably there is a need for an appropriate level of external facilities and amenities.*

Therefore the Department seeks the following provisions through conditions attached to any planning approval;

- (i) Multi-storey school structure (2 – 4 storeys) shall be allowed for consideration at the future school site.*
- (ii) As the Department will not have any capacity to modify the transport infrastructure as part of a future planning application. The Board is asked to determine and confirm that the transport infrastructure proposed under the current SHD application and its Mobility Management Plan and Traffic and*



- (iii) Transport Assessment (TTA) is deemed to incorporate all future projected traffic and transport needs for the school.*
- (iv) The Department has been provided with Traffic & Transport Assessment 1st Draft 27/05/2021.*
 - (a) There is only reference to bicycle parking for the school in the TTA.*
 - (b) The site plan and podium level floor plans indicate a ramp to the basement/under-podium for 16 no. school car-parking spaces at Block/Zone H. The actual location of the car-parking for the school is not designated.*
 - (c) It is requested that any planning consent shall condition and mandate the final location school car-parking spaces;*
 - (d) That the school parking shall be grouped together at a convenient location to the school, and if remote from the school shall be provided with a safe and secure route between the parking and the nearest entrance to the school site.*
 - (e) That those spaces shall have a proportionate number of Mobility Impaired Parking (sn.4.4.7) at the location of the school;*
 - (f) That those spaces shall have a proportionate number of Electric Vehicle charging points;*
 - (g) That those spaces shall be reserved and protected in contract until required. The Board is requested to execute a binding agreement through an appropriate mechanism on the applicant, its successors and/or their operators to ring-fence those car-parking spaces for the sole use by the school, and they shall not be sold-on, disposed of, nor rented, and protected from any form of adverse possession in the interim.*
- (v) It shall be mandated, due to the scarcity of play and recreational amenities on this small urban site, that up to 50% of the adjacent playing pitches shall be made available for exclusive school use during school-term and for the operational hours of the school day.*

Yours sincerely.....

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