



An  
Bord  
Pleanála

## Inspector's Report

### ABP-319409-24

#### Development

Permission for a 2-storey extension to the existing school building, comprising of a link corridor, 2 no ground floor Special Education need classrooms with ancillary accommodation, an enclosed sensory garden and 3 no first floor general classrooms, car park modifications and extension to provide 18no. spaces, and associated site and drainage works to include provision of a waste water treatment system

#### Location

Naul National School, The Naul, Fingal, Co. Dublin

#### Planning Authority

Fingal County Council

#### Planning Authority Reg. Ref.

F23A/0236

#### Applicant(s)

Board of Management of Naul National School

#### Type of Application

Permission

#### Planning Authority Decision

Grant Permission

<b>Type of Appeal</b>	Third Party
<b>Appellant(s)</b>	Naul Community Council
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	14 <sup>th</sup> May 2024
<b>Inspector</b>	Emma Nevin

## **1.0 Site Location and Description**

- 1.1. The appeal site, which has a stated area of 0.79 ha, is located on the outskirts of Naul village off the R108. The site is accessed via an existing entrance off the R108, with an existing set-down area and parking to the front of the school premises, and an entry and exit one-way system.
- 1.2. The appeal site accommodates an existing school complex, including two prefabricated buildings, which are positioned to the front of the school along the northwestern boundary. The existing school has a stated area of 744 sq. m. There are extensive grassed playing fields to the rear of the school with mature planting to the site boundaries.
- 1.3. To the site is bound by residential dwellings and agricultural lands.

## **2.0 Proposed Development**

- 2.1. The proposed development comprises a 2-storey extension to the existing school building with a stated area of 966.2 sq. m. The proposed extension is located to the southwest corner of the site and will be connected to the existing school via a link corridor.
- 2.2. The proposed extension comprises two ground floor special education need classrooms with ancillary accommodation, an enclosed sensory garden and 3 no. first floor general classrooms.
- 2.3. Modifications are proposed to the existing car park arrangement with 18 no. car parking spaces proposed. The existing entry and exit arrangements to the site will be modified, with a new ramp and footpath added. The existing bollards to the front of the site will be removed, and pencil bollards introduced to the roadside of the pavement.
- 2.4. The proposed works also include associated site and drainage works including the provision of a waste water treatment system to serve the proposed school extension.
- 2.5. The existing prefabricated buildings to the northwest boundary to the front of the existing school will be removed following the completion of the extension.

## 3.0 Planning Authority Decision

### 3.1. Decision

3.1.1. The Planning Authority granted permission, following further information request, on 1<sup>st</sup> March 2024, subject to 16 conditions, which included the following:

- Condition 3 relates to the removal of single storey perforated single story temporary classroom structures within a specified timeframe.
- Condition 6 relates to the specifications of the entrance and exit junctions and the footpath to be agreed with the local authority prior to the commencement of development.
- Condition 7 relates to a Construction Management Plan and Construction Traffic Management Plan.
- Condition 9 relates to the landscaping, arboricultural report, and a Tree Bond.
- Condition 10 relates to the proposed wastewater treatment system.
- Condition 16 relates to hours of operation.

### 3.2. Planning Authority Reports

3.2.1. Planning Reports dated 4<sup>th</sup> July 2023 and 29<sup>th</sup> February 2024 have been provided.

3.2.2. The original planning report considered it necessary to seek further information on the following items:

- To request the applicant to provide proposals for cycle parking providing a minimum of 5 no. long stay and 55 no. short-stay bicycle parking spaces, including EV charging spaces and details of same.
- To demonstrate the entrance and exit widths off the R108 reduced to accommodate a single vehicle lane width and a continuous footpath across the junctions. Pencil bollards on the footpath along the road edge of the R108, and consideration given to extending the site boundary, subject to landowner consent, to incorporate a longer section of footpath.

- To widen the footpath adjacent to car park space no. 2 and consult with the Transportation Department in this regard.
- To submit a detailed landscape plan, including a tree survey.
- To demonstrate the overall need in terms of necessity, deficiency, and opportunity to enhance the existing school.
- To submit a School Travel Plan.

3.2.3. The planners report concluded that the further information sufficiently addressed all items under the further information requests and that the proposed extension is acceptable and is in accordance with the Fingal County Development Plan 2023 – 2029, subject to 16 no. conditions.

3.2.4. Other Technical Reports:

- Water Services: Report received recommended conditions.
- Transportation Planning Section: Report received recommending further information. Following further information conditions recommended.
- Parks and Green Infrastructure: Report received recommending further information. Following further information conditions recommended.
- Archaeology: No objection.
- Environmental Department: Report received recommended conditions.
- Arts/Culture Department: No report received.

### 3.3. **Prescribed Bodies**

3.3.1. The Planning Authority indicated that the following prescribed bodies were consulted.

- Uisce Eireann: Report received recommended conditions.

### 3.4. **Third Party Observations**

3.4.1. Four third party submission were received, the issues raised can be summarised as follows:

- Road safety specifically sightlines, site visibility, lack of dimensioned drawings for footpaths and roads, pedestrian, and disabled access safety.
- Traffic calming measures, vehicles turning, road markings, cycle infrastructure, car parking, signage.
- Site entrance issues, travel patterns and lighting.
- Response to existing travel patterns.
- Integration of the scheme with approved Traffic Calming Scheme (Mobility Management Plan and omissions from Road Safety Audit).
- Relocation of the school.
- Capacity with the wastewater treatment plant serving Naul.

#### 4.0 Planning History

F20A/0314: Permission granted by Fingal County Council on 12<sup>th</sup> October 2020 for the development of temporary classroom accommodation consisting of 1 classroom (90 sq. m.) and 2 ASD Units (108 sq. m.) and all associated site works.

F15A/0137: Permission granted by Fingal County Council on 25<sup>th</sup> May 2015 for Single storey school extension containing 1 no. classroom, 2 no. offices, canteen and amenities, and all associated site works.

F13A/0060: Permission granted by Fingal County Council on 16<sup>th</sup> April 2013 for the provision of a revised parking facility/set down area to the front of Naul National School with re-located front boundary wall, including signage and all associated site works.

F12A/0227: Permission granted by Fingal County Council on 24<sup>th</sup> August 2012 for the removal of 2 no. existing prefabricated buildings and construction of a single storey detached school extension containing 3 no. classrooms, amenities, and all associated site works.

F07A/0962: Permission granted by Fingal County Council on 18<sup>th</sup> September 2007 for one x 2 classroom prefabricated building, one x 1 classroom prefabricated building together with ancillary site works.

## 5.0 Policy Context

### 5.1. Fingal Development Plan 2023 – 2029

5.1.1. The subject site is zoned 'RU' Rural, with a stated objective "*Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage*".

5.1.2. With a Vision to "*Protect and promote the value of the rural area of the County. This rural value is based on:*

- *Agricultural and rural economic resources*
- *Visual remoteness from significant and distinctive urban influences,*
- *A high level of natural features.*

*Agriculture and rural related resources will be employed for the benefit of the local and wider population. Building upon the rural value will require a balanced approach involving the protection and promotion of rural biodiversity, promotion of the integrity of the landscape, and enhancement of the built and cultural heritage*".

5.1.3. The site is located within a highly sensitive landscape, as indicated on Sheet 14 – Green Infrastructure in the Development Plan.

### 5.2. Relevant Development Plan Policy:

- Section 14.3.2 Screening for Appropriate Assessment.
- 4.5.1.4 Education – Primary and Post-Primary
- Policy CIOSP6 – Facilities for Children, Teens and Young Adults "*Provide appropriate recreational, community, social and educational facilities for children, teens and young adults*".
- Objective CIOSO17 – Educational Infrastructure "*Encourage the continued use and possible intensification of existing educational infrastructure where appropriate. Facilitate the development of new schools, the re-development of existing schools and extensions planned as part of the Government's School Building Programme*".

- 14.14.3 Educational Facilities - Any application for education facilities, including new schools and/or redevelopment/extensions of existing schools, shall have regard to the following:
  - Overall need in terms of necessity, deficiency, and opportunity to enhance or develop schools.
  - Site location, proximity of school to catchment area, size of site relative to outdoor space requirements and the future needs of the school (i.e. sufficient space provided for future expansion).
  - Traffic and transport impact on the surrounding road network.
  - Good, safe accessible pedestrian and cyclist routes to and from the school from nearby residential and commercial areas.
  - Adequate cycle facilities.
  - Safe access and adequate car parking layout to facilitate drop off/pick up.
  - Adequate signage, lighting and boundary treatments.
  - Impact on local amenities and out of school hours uses/dual functioning of school facilities.
  - Conformity with the requirements of appropriate legislative guidelines. Conformity with land use zoning objectives.
  - In all cases, a School Travel Plan shall be submitted with an application for any school development, requirements of which should be ascertained at pre-planning stage.
  - Dual function of sports facilities/halls etc. outside of school hours will be encouraged where the use of such facilities will be of a benefit to the wider community, however any outside hours usage of the school should not be to the detriment of adjoining residential amenities.
  - Full details of all anticipated uses outside of school hours should be provided with the planning application. Temporary classrooms will be assessed on a case-by-case basis and will generally be accepted for a period not exceeding five years and such classrooms should not



interfere with onsite car/ cycle parking spaces or unduly impact the usability of outdoor play/sports facilities.

➤ Extensions to schools will generally be accepted where they will replace existing temporary classroom structures on site. School extensions should be located having regard to adjoining amenities and amenities within the school site.

- 14.17.2 Bicycle Parking - Table 14.17: Bicycle Parking Standards
- 14.17.3 Mobility Management Plan/Workplace Travel Plans
- Objective DMSO119 – Car Parking at Places of Work and Education
- Objective DMSO241 – Construction and Demolition Waste Management Plan
- Objective SPQHO62 – School Provision “*Work collaboratively with the Department of Education in identifying demand and meeting increased school place requirements in Rural Villages*”.

### 5.3. Natural Heritage Designations

5.3.1. The subject site is not located within a designated European Site. An AA screening report was submitted with the application and notes that there are 8 no. Natura 2000 Sites within a 15km radius of the subject site as follows:

- 8.9 kilometres from the River Nanny Estuary and Shore SPA (Site Code: 004158), which is located to the north-east of the site.
- 11 kilometres from the Rogerstown Estuary SAC (Site Code: 000208), which is located to the south-east of the site.
- 11 kilometres from the Rogerstown Estuary SPA (Site Code: 004015), which is located to the south-east of the site.
- 12.4 kilometres from the Skerries Islands SPA (Site Code: 004122), which is located to the east of the site.
- 13.3 kilometres from the Malahide Estuary SAC (Site Code: 000205), which is located to the south-east of the site.

- 13.3 kilometres from the Malahide Estuary SPA (Site Code: 004025), which is located to the south-east of the site.
- 13.9 kilometres from the Boyne Coast and Estuary SAC (Site Code: 001957), which is to the north of the site.
- 14.4 kilometres from the Rockabill to Dalkey Island SAC (Site Code: 003000), which is to the east of the site.

#### **5.4. EIA Screening**

5.4.1. An Environmental Impact Assessment screening report has been submitted with the planning application.

5.4.2. I refer the Board to the completed Form 1 in Appendix 1.

Having regard to the nature, size, and location of the proposed development and to the criteria set out in Schedule 7 of the Regulations, I have concluded at preliminary examination that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, therefore, is not required.

### **6.0 The Appeal**

#### **6.1. Grounds of Appeal**

6.1.1. A third-party appeal has been received from Naul Community Council. The grounds of appeal are summarised below:

- Concerns for the safety of members of the public and the school community by the decision to grant permission for the intensification of development on the existing school site.
- The substantive safety concerns at the school remain unaddressed and the intensification of activities may pose a traffic hazard and road safety risk.
- A historic summary of safety concerns and quotations from articles has been provided as part of the appeal which highlights incidents at this location since c. 2007.

- Representatives of the school and community were promised a report into Road Safety issues at the school by the Council.
- Following a Road Safety Meeting, the school was provided with a letter from an inspector of Balbriggan Garda Station, the inspectors comments largely support those made by Naul Community Council to the local authority.
- The local community, the Gardai and Fingal County Council all agree that there are substantial road safety risks in the vicinity of the school.
- Concern about piecemeal traffic calming measures by the Council and proposals within the applicants planning application are not being dealt with in a holistic manner.
- There is absolutely no input on or oversight by the NTA.
- To isolate and confine the road engineering issues to the red line boundary is unacceptable in the context of the issues concentrated at the area between the village boundary to the north and the crossroads to the south of the school.
- The Council have not taken into considerations issues within the surrounding road network and should have notified the NTA of the proposed development so that a more holistic traffic assessment could be undertaken on the road.
- There is no record of meetings on site between the community and Fingal County Council officials in relation to safety concerns at the vicinity of the school.
- The local authority has failed to take into account long standing traffic hazards and road safety issues in the vicinities of school.
- The development is likely to have a significant impact on traffic flow and the road network in the vicinity of the development - it cannot be viewed in isolation without considering the wider impact on the road network.
- The footpaths in the immediate vicinity are severely degraded and do not allow safe access from the built-up areas to the school.
- There is not enough adequate space to pull in off the road safely.

- Concerns of Traffic Safety a drop off and pick up times.
- Parking is an issue.
- Naul is a farming community and so has many large farm vehicles travelling this road daily which may result in an accident at this school.
- There is no playground or physical education hall for the children to play.
- A walking and cycling to school initiative was abandoned due to safety concerns.
- An increasing number of students attending the school will result in more traffic movements and more safety concerns.
- The school needs to be entirely relocated.

## 6.2. Applicant Response

6.2.1. A first party response to the appeal was received dated 14<sup>th</sup> May 2024, prepared by the applicant's agent.

6.2.2. The submission responds to the issues raised within the third party appeal as follows: -

- At every stage of the design, the design team have been actively engaging with Fingal County Council to address any potential issues, within the applicant site boundary.
- Alternative designs were prepared to address any issues.
- The information provided in the three ORS Consulting Engineering Assessments/Reports address some of the issues raised by the appellant.
- These issues have been addressed within the confines of the site boundary to the satisfaction of Fingal County Council.
- Any issues identified as a matter outside the applicants site ownership boundary are beyond the scope of this planning application.

### 6.3. **Planning Authority Response**

- 6.3.1. Report received dated 29<sup>th</sup> April 2024, stating that access and transport issues were considered in the assessment of this application and the Planning Authority is satisfied that adequate arrangements have been proposed as set out in the response to the request for additional information received 8<sup>th</sup> February 2024 and conditions attached in the decision to grant permission.

In addition, Fingal County Council members have approved a proposal to install flat top traffic calming ramps south and north of the school on the R108. This will benefit the existing and proposed development when installed. The Planning Authority respectfully requests that its decision is upheld.

- 6.3.2. In the event that the Planning Authority's decision is upheld, the Planning Authority requests that conditions requiring financial contributions in accordance with the Section 48 Development are included.

### 6.4. **Observations**

None received.

### 6.5. **Further Responses**

None received.

## 7.0 **Assessment**

- 7.1. Having examined the application details and all other documentation on file, including the third party appellant's submission (the subject matter of this appeal), site inspection and having regard to the relevant policies, objectives, and guidance, I am satisfied that the main issues to be considered are those raised in the grounds of appeal, and I am satisfied that no other substantive issues arise. This assessment represents my de novo consideration of all planning issues material to the proposed development.

- 7.2. As such, the main issues in determining this appeal are as follows:

I. Principle of Development

- II. Overdevelopment of the site
- III. Parking, Traffic and Pedestrian Safety
- IV. Appropriate Assessment, and
- V. Other Matters.

### 7.3. Principle of Development

- 7.3.1. The subject site is zoned 'RU' Rural, in the Development Plan with a stated objective "*Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage*".
- 7.3.2. While 'education use' is not listed as a use class under this zoning objective, I note that the instant appeal relates to the construction of an extension to an existing established school building on site. Notwithstanding the zoning objective, given the established use on site, I consider that the principle of the proposed extension to the existing school to be acceptable.
- 7.3.3. I reference Section 14.14.3 Educational Facilities of the Development Plan, which provides criterion for any application for education facilities, including the redevelopment/extensions of existing schools. Regard is had to the further information request, which address several items in relation to the overall need for the proposed extension and detailed information in relation to the access, parking, school travel plan, etc.
- 7.3.4. As such the principle of the proposed extension to an existing established school is acceptable and is in compliance with relevant Development Plan policies and objectives.

### 7.4. Overdevelopment of the site

- 7.4.1. Concerns have been raised in the third-party appeal, in relation to overdevelopment of the site and the increased number students attending the school.
- 7.4.2. The proposed extension will be concentrated to the southwest corner of the overall site and will be linked to the existing school building with extensive garden/playing pitch play areas retained to the northwest and west of the proposed extension. I also

note that the proposed extension includes play areas, sensory garden, and central activities space, providing adequate play space for the children.

While the proposed school extension has a proposed floor area of c. 966 sq. m. (resulting in an overall school floor area of c. 1710.2 sq. m.), having regard to the extensive site area, the scale and position of the proposed extension within the overall site, I do not consider that the proposal would amount to overdevelopment of this site.

- 7.4.3. I note that as part of the further information request, the applicant was requested to demonstrate the overall need in terms of necessity, deficiency, and opportunity to enhance the existing school. The existing school currently has 162 no. students enrolled including 149 no. mainstream children. The school currently has 6 mainstream classrooms, with the 6<sup>th</sup> mainstream class located in a resource room. It is projected that the extension proposed will assist in addressing future community demand, which will require 8 mainstream classes to be provided. The current projections for the school estimate that a teacher and classroom, with a requirement to cater for 169 no. children is required by September 2026.
- 7.4.4. In addition, the proposal will provide 2 no. special education needs classrooms and a sensory garden to meet the requirement that Naul National School provide an Autism Spectrum Disorder class due to shortages in the area.
- 7.4.5. I also note that the proposed extension will be replacing two no. temporary classroom structures, which are located to the front portion of the site, adjacent to the external playground. The removal of the temporary classrooms will provide a more usable playground area to the front of the site.
- 7.4.6. As such, I consider that the proposal is justified to meet the predicted community demands for school places and will greatly enhance the existing school facilities on site.

## **7.5. Parking, Traffic and Pedestrian Safety**

- 7.5.1. The main concerns raised by the appellant relate to the negative traffic impacts are currently being experienced in the area due to school traffic at peak times. This is caused by the existing school and the impact it has on traffic and the general

environment in this part of the Naul village. It is stated that the proposed expansion of the school would lead to an intensification of the existing problems.

- 7.5.2. Having inspected the site I note that there is a reasonable amount of off-street car parking available within the premises of the school. The parking spaces are located at the front of the main school building. During my site inspection – which was on a school day, albeit outside peak times – I noted that there were no illegally parked vehicles in the vicinity of the site and that there were a small number of vacant spaces available onsite. Nonetheless, I acknowledge the Planning Authority requested further information in relation to a number of items including, the entrance/exit width to the school, an improved footpath and traffic calming measures (Items 2 and 5) and to submit a Mobility Management Plan (School Travel Plan), which in the absence of public transport connections to the school will encourage other initiatives to/from the school (Item 4). The applicant submitted revised design to address the items raised to cater for the existing and future operational needs of the school.
- 7.5.3. The revised design is in accordance with DMURS and is a marked improvement over the existing layout, including in relation to vehicular access, pedestrian facilities, and parking arrangements. It would have a dedicated footpath, pencil bollards and unobstructed sightlines. The proposal would greatly improve the general road conditions at the school, in my opinion.
- 7.5.4. A total of 18 no. car parking spaces would be provided for the school as part of the proposed development, with all proposed spaces within the school grounds. I note that the proposed car parking provision would be in accordance with the Table 14.19: Car Parking Standards of the Development Plan, which requires a total of 16 no. spaces for both the mainstream classroom component (12 no. spaces) and new SEN classrooms (4 no. spaces).
- 7.5.5. I further note that additional cycle parking facilities would be provided for the school in the form of 60 no. cycle parking spaces. The parking bicycle stands would easily be accessible via a new footpath and are located at the eastern part of the school yard and near the existing school building.
- 7.5.6. I acknowledge the Appellant's concern that the proposal was not discussed with National Transport Authority (NTA). However, I note that the application is for an extension to an existing established school, and is accompanied by a Traffic and



Transport Assessment, a Mobility Management Plan, and a Road Safety Audit for the proposed development. I consider this to be sufficient to assess the proposal from a traffic safety perspective.

- 7.5.7. In relation to the concerns expressed in relation to the adjoining road network and traffic movements outside of the subject site. I consider that this is outside of the remit of the applicant under the instant appeal and that such works and activity fall outside of the Board's remit in deciding this application. I also note the response received from the local authority on the appeal, which states that Fingal County Council members have approved a proposal to install flat top traffic calming ramps south and north of the school on the R108. The local authority note that these works will benefit the existing and proposed development when installed.
- 7.5.8. In summary, and having regard to the above, I consider that the proposed development would result in a satisfactory entry/exit road design and layout, which would be unlikely to result in any additional traffic congestion or endanger public safety by way of presenting as a traffic hazard. Conversely, the proposed development would likely enhance the existing layout and be conducive to improved pedestrian safety.

## 7.6. **Appropriate Assessment**

- 7.6.1. I have considered the application for a 2-storey extension to the existing school building, car park modifications, associated site and drainage works to include provision of a waste water treatment system title of project in light of the requirements S177U of the Planning and Development Act 2000 as amended.
- 7.6.2. The subject site is located an approximate distance from the following Natura 2000 Sites:
- 8.9 kilometres from the River Nanny Estuary and Shore SPA (Site Code: 004158), which is located to the north-east of the site.
  - 11 kilometres from the Rogerstown Estuary SAC (Site Code: 000208), which is located to the south-east of the site.
  - 11 kilometres from the Rogerstown Estuary SPA (Site Code: 004015), which is located to the south-east of the site.

- 12.4 kilometres from the Skerries Islands SPA (Site Code: 004122), which is located to the east of the site.
- 13.3 kilometres from the Malahide Estuary SAC (Site Code: 000205), which is located to the south-east of the site.
- 13.3 kilometres from the Malahide Estuary SPA (Site Code: 004025), which is located to the south-east of the site.
- 13.9 kilometres from the Boyne Coast and Estuary SAC (Site Code: 001957), which is to the north of the site.
- 14.4 kilometres from the Rockabill to Dalkey Island SAC (Site Code: 003000), which is to the east of the site.

7.6.3. As noted in the forgoing, the proposed development comprises an extension and alterations to an existing established school building at this location. The proposed works also include modifications the existing entry/exit and parking for the school and the provision of a new wastewater treatment system.

7.6.4. No nature conservation concerns were raised in the planning appeal.

7.6.5. Having considered the nature, scale, and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European Site. The reason for this conclusion is as follows:

- Nature of works comprising an extension and alterations to an existing school site at this location.
- The location and distance from nearest European site and the lack of any hydrological connectivity between the application site and the SAC/SPA.
- Taking into account screening report/determination by Planning Authority and the Appropriate Assessment Screening report submitted with the application.

7.6.6. I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects.

7.6.7. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

## 7.7. Other Matters

### 7.7.1. Wastewater Treatment System and Surface Water:

The existing foul drainage system appears to be partially combined with stormwater and ultimately connects to the existing combined sewer. Following discussions with Uisce Eireann it was determined that upgrade works are required to the Naul Wastewater treatment facility, which will be undertake c. 2025, and the final connection for the school can be made upon completion of the works. In the interim, and on the advice of Uisce Eireann, the applicant is proposing a new treatment system to serve the proposed new extension. A separate foul sewer is proposed to serve the extension, which will lead toward a new foul pumping station. As such, I consider that the proposed wastewater treatment system will provide adequate capacity to serve the proposed extension to the school in the interim, and therefore consider that the proposal is acceptable and would not be prejudicial to public health. I also note that the local authority has no objection to the works.

In relation to surface water, the existing school site appears to be drained via a combination of soakaways and connections via the existing combined sewer within the site boundary, which connects to the existing combined sewer along the R108. Stormwater runoff from the roof and paved areas shall be discharged via downpipes and AJs to a new underground drainage pipe network which will connect to the new underground stormwater system. Stormwater will fall by gravity to the new infiltration blanket beneath the new hard play area which will comprise permeable surfacing. I consider that the proposed surface water drainage proposals are considered.

### 7.7.2. Miscellaneous issues:

The references to meetings and discussions between various parties in relation to the school and the existing road network are noted however, I consider that this is outside of the remit of the instant appeal and that such activity fall outside of the Board's remit in deciding this application.

## 8.0 Recommendation

8.1. I recommend that planning permission should be granted, subject to conditions, as set out below, for the following reasons and considerations.

## 9.0 Reasons and Considerations

9.1. Having regard to the current established use of the site as a school, the nature, scale and design of the proposed development, and pattern of development in the surrounding vicinity, it is considered that, subject to compliance with the conditions below, the proposed development would not seriously injure amenities of the area or of property in the vicinity, and would be acceptable in terms of scale, traffic, pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 10.0 Conditions

1.	<p>The development shall be retained and completed in accordance with the plans and particulars lodged with the application [as amended by the further plans and particulars submitted to the local authority on the 8<sup>th</sup> day of February 17<sup>th</sup> 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p><b>Reason:</b> In the interest of clarity.</p>
2.	<p>The existing pre-fabricated classroom structures on site shall be decommissioned and removed from the site within six months of the first occupation of the new classroom accommodation unless its retention is permitted by a separate grant of permission.</p> <p><b>Reason:</b> In the interests of clarity and the protection of residential and visual amenity.</p>

3.	<p>Details of the materials, colours, and textures of all the external finishes to the garage/shed structure shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p><b>Reason:</b> In the interest of visual amenity.</p>
4.	<p>All bathroom windows shall be fitted and permanently maintained with obscure glass; the use of film is not acceptable.</p> <p><b>Reason:</b> In the interest of amenity.</p>
5.	<p>Surface water drainage arrangements shall comply with the requirements of the planning authority for such works and services.</p> <p><b>Reason:</b> In the interest of public health and surface water management.</p>
6.	<p>(a) Finalised design details and specifications of the proposed entrance and exit junctions off the R108 and the footpath along the R108, and;</p> <p>(b) The gradient of the access/egress shall not exceed 2.5% over the last 6 metres of the approach to the public road, with details which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p><b>Reason:</b> In the interests of safety.</p>
7.	<p>Prior to the commencement of development, the developer shall enter into a Connection Agreement(s) with Uisce Eireann to provide for a service connection(s) to the public water supply and / or wastewater collection network.</p> <p><b>Reason:</b> In the interest of public health and to ensure adequate water/ wastewater facilities.</p>
8.	<p>(a) The wastewater treatment system hereby permitted shall be installed in accordance with the recommendations included within the site characterisation report submitted with this application on [date] and shall be in accordance with the standards set out in the document entitled "Waste Water Treatment Manual - Treatment Systems for Small Communities, Business, Leisure Centres and</p>

	<p>Hotels, and the Code of Practice for Domestic Waste Water Treatment Systems (Population Equivalent <math>\leq 10</math>)” – Environmental Protection Agency, 2021, as applicable.</p> <p>(b) Treated effluent from the treatment system shall be discharged to a percolation area which shall be provided in accordance with the standards set out in the document entitled “Code of Practice”.</p> <p>(c) The applicant shall agree a plan for the decommissioning of the interim waste water treatment system with Uisce Eireann and in accordance with the standards set out in the Environmental Protection Agency document(s) referred to above.</p> <p><b>Reason:</b> In the interest of public health and to prevent water pollution.</p>
9.	<p>All service cables associated with the proposed development (such as electrical, telecommunications and communal television) located outside buildings or not attached to buildings shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. Details of the ducting shall be submitted to and agreed in writing by the planning authority prior to the commencement of development.</p> <p><b>Reason:</b> In the interest of visual amenity.</p>
10.	<p>Site development and building works shall be carried out only between the hours of 0700 and 1800 Mondays to Fridays inclusive, between 0800 to 1300 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.</p> <p><b>Reason:</b> In order to safeguard the amenities of properties in the vicinity.</p>
11.	<p>That all necessary measures be taken by the contractor to prevent the spillage or deposit of clay, rubble, or other debris on adjoining roads, including responsibility and repair for any damage to the public road to the satisfaction of the planning authority, during the course of the works.</p>

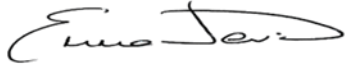
	<b>Reason:</b> To protect the amenities of the area.
12.	<p>Prior to the commencement of development, the developer or any agent acting on its behalf, shall prepare a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.</p> <p><b>Reason:</b> In the interest of proper planning and sustainable development.</p>
13.	<p>Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a Traffic Management Plan (TMP) for the construction phase of the development for the written agreement of the planning authority. The TMP shall incorporate details of the road network to be used by construction traffic including over-sized loads, detailed proposals for the protection of bridges, culverts and other structures to be traversed, as may be required. The agreed TMP shall be implemented in full during the course of construction of the development.</p> <p><b>Reason:</b> In the interest of sustainable transport and safety.</p>
14.	<p>Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a detailed Construction Environmental Management Plan (CEMP) for the written agreement of the planning authority. The CEMP shall incorporate details for the following: collection and disposal of construction waste, surface water run-off from the site, on-site road construction, and environmental management measures during construction including working hours, noise control, dust and vibration control and monitoring of such measures. A record of daily checks</p>

	<p>that the construction works are being undertaken in accordance with the CEMP shall be kept at the construction site office for inspection by the planning authority. The agreed CEMP shall be implemented in full in the carrying out of the development.</p> <p><b>Reason:</b> In the interest of residential amenities, public health, and safety.</p>
15.	<p>All landscaping works shall be completed, within the first planting season following commencement of development, and in accordance with landscape drawing no. 23FG07-DR-0100 REV. P01 submitted to the planning authority on [8<sup>th</sup> February 2024]. Any trees and hedging which die, are removed, or become seriously damaged or diseased, from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p><b>Reason:</b> To ensure the satisfactory implementation of the requirements of landscaping/tree preservation/protection measures.</p>
16.	<p>(a) Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable to the planning authority, to secure the satisfactory retention of the trees and hedgerows shown for retention as per drawing no. 23FG07-DR-0100 REV. P01, coupled with an agreement empowering the planning authority to apply such security or part thereof to satisfactory implementation of said landscaping measures.</p> <p>(b) This security shall remain in place until the requirements of part (a) above are completed to the satisfaction of the planning authority.</p> <p><b>Reason:</b> To ensure the satisfactory implementation of the requirements of landscaping/tree preservation/protection measures.</p>

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has



influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.



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Emma Nevin  
Planning Inspector

25<sup>th</sup> June 2024

## Appendix 1 - Form 1

### EIA Pre-Screening

[EIAR not submitted]

<b>An Bord Pleanála Case Reference</b>	319409-24		
<b>Proposed Development Summary</b>	Permission for a 2-storey extension to the existing school building, comprising of a link corridor, 2no ground floor Special Education need (SEN) classrooms with ancillary accommodation, an enclosed sensory garden and 3no first floor general classrooms, car park modifications and extension to provide 18no spaces, and associated site and drainage works to include provision of a waste water treatment system.		
<b>Development Address</b>	Naul National School, The Naul, Fingal, Co. Dublin		
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b> (that is involving construction works, demolition, or interventions in the natural surroundings)		<b>Yes</b>	X
		<b>No</b>	
<b>2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) or does it equal or exceed any relevant quantity, area or limit where specified for that class?</b>			
Yes			
No	X		Proceed to Q.3
<b>3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?</b>			
		<b>Threshold</b>	<b>Comment (if relevant)</b>
			<b>Conclusion</b>
No	X		Extension and alterations to existing established national school
			No EIAR or Preliminary Examination required

Yes				
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<b>4. Has Schedule 7A information been submitted?</b>		
No	X	Preliminary Examination required
Yes		Screening Determination required