



An
Coimisiún
Pleanála

Inspector's Report ACP-322888-25

Development	Construction of a primary school etc
Location	A c. 1.8 Ha site on lands at Broomfield, Malahide, Co. Dublin
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F24A/0541E
Applicant	The Department of Education.
Type of Application	Permission.
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellants	Brian Nolan Zoe and Ronan Palmer.
Observers	Fiona O Connor and David Magee Simon Carbery.
Date of Site Inspection	11 th September 2025.
Inspector	Lucy Roche

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1.0 Site Location and Description

- 1.1. The proposed development is located on the periphery of Malahide, south of Malahide Demesne and west of the Dublin-Belfast Railway line, in the area of Broomfield. Malahide Main Street is approximately 1.5km to the northwest and the train station approximately 1.6km (as the crow flies). Existing development in the area is predominantly residential with further residential development ongoing to the southeast and a permitted Large-scale Residential Development to the north. Lands to the immediate south and west of the development site are in agricultural use and are zoned 'GB – Greenbelt in the Fingal Development Plan.
- 1.2. The site is accessed from the newly constructed Broomfield access road via Back Road, which connects the Malahide/Dublin Road (R107) with the road from Malahide to Portmarnock (R124), known as The Hill. The Broomfield access road currently serves the residential developments of Ashwood Hall to the north and Brookfield to the west. The Broomfield access road is being extended as part of the ongoing residential development southwest and will connect with Kinsealy Lane.
- 1.3. The site itself comprises part of a large agricultural field. The northern site boundary is defined by the existing field boundary while the south, east and west boundaries are open to the remainder of the site. The site falls gradually from north to south ranging in level from 12.78m at the northern boundary to 9.50m at the southern boundary. Access to the site is proposed via the Broomfield access road, across wide grass verge on the eastern boundary of the Brookfield development.

2.0 Proposed Development

- 2.1. The proposal is for a new primary school that is intended to provide permanent accommodation for Malahide-Portmarnock Educate Together which is currently housed in temporary accommodation in Kinsealy, c.2km southeast of the proposed development site.
- 2.2. The proposed school building comprises 16 no. classrooms and a 4-no. classroom Special Educational Needs Unit. The school building is 2 no. storeys, with a total gross internal floor area of 3,610sqm. The building incorporates a double height general purpose hall measuring 195sqm, adjacent to the main entrance, thus

facilitating after-hour use by the public. The design of the building incorporates a 60% green roof along with c.90sqm of roof-mounted solar panels.

- 2.3. In terms of outdoor amenity, a junior play area of c. 590 sq. m is proposed in the eastern portion of the subject site along with 2 no. external ballcourts to the northeast corner. Additional, open green areas are proposed towards the southern end of the site, providing informal play space. The Special Education Needs Unit will have a dedicated secure hard and soft play area (265sqm) and a sensory garden measuring 85sqm.
- 2.4. A new vehicular, pedestrian and cycle access is proposed to the west of the site, connecting to Brookfield Housing Estate. The proposal also includes for ESB sub-station and switchroom, bin storage and LPA tank compound within the subject site. 3 no. freestanding flagpoles, measuring 10m high each, are proposed to the front of the school building while signage is to be provided on the building's front façade and adjacent to the school gate. A 2.4m high wall is proposed for the site boundary, comprised of brick wall and piers with metal railings.
- 2.5. The development was amended at RFI stage, with changes to the quantum and layout of school drop-off spaces.
- 2.6. Key Development Details and Statistics:

Site Area	1.8 ha	
Floor Area	3,610 sq. m	
Height	2-storey (c9.23m)	
Materials	The materiality of the building façade includes render, colour brick, panelised cladding, and horizontal louvres.	
Parking / drop-off	Car Parking Spaces	27 including 3 EV spaces
	Drop-off	12 spaces (reduced from 34 at RFI stage)
	Bus Stop	1
	Universal Access	3
	Bicycle and Scooter	280

Accommodation	No. of Pupils	440
	No. of Staff	36

2.7. The application is accompanied by (inter alia):

- Planning Report
- Planning Report on behalf of Dept. of Education and Skills
- Photomontages
- Utility Information for the Mechanical and Electrical Services
- External Lighting Report (updated at RFI stage)
- Engineering Assessment Report
- Flood Risk Assessment
- Traffic and Transport Assessment (updated at RFI stage)
- Road Safety Audit
- School Travel Plan
- Construction and Demolition Waste and Environmental Management Plan
- Arboricultural Report and Tree Schedule
- Landscape Specifications and Maintenance Plan
- Energy efficiency and Climate Action Design Statement

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. Following an initial request for further information, Fingal County Council, decided on the 19th of June 2025 to grant permission for the proposed development subject to 13 no. conditions. The majority of the conditions are standard for a development of the nature proposed. No financial conditions were attached.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Initial Report (Aug. 2024)

The initial report of the Local Authority Case Planner has regard to the locational context and planning history of the site, to relevant planning policy, to the third-party submissions received and to the reports from internal departments and prescribed bodies. The assessment can be summarised as follows:

- Some discrepancies were identified in the application documentation relating to the ownership of the site.
- In terms of compliance with relevant FCDP Objectives and Policies, the Case Planner is satisfied that the proposal is acceptable in principle subject to normal planning criteria.
- The Case Planner indicates that the site can accommodate a school of the height, scale and design proposed and that the proposal would have no undue impact on the residential amenities of adjoining properties in terms of over-looking, overshadowing or overbearance.
- The report concludes with a recommendation for additional information on issues raised in the assessment and in the reports of the Transportation Planning Department, Parks and Green Infrastructure and Water Services Planning Section.

Report on Further Information Received (June 2025)

- The second and final report of the Local Authority Case Planner considers the further information received on the 23rd of May 2025, along with the third-party submissions and inter-departmental reports received.
- Regarding landownership, it was confirmed that the Dept. of Education are the predominant owners of the lands (1.796ha). The access road is proposed via third party lands. The application documentation includes a letter of consent.

- The Case Planner is satisfied that the applicant adequately addressed the items raised in the further information request and that any outstanding issues could be addressed by way of condition.
- The report concludes with a recommendation to grant permission subject to 16no. conditions. This was revised to 13 no. conditions with the removal of financial conditions.

3.2.2. Other Technical Reports

- **Water Services:** - Initial report (June 2024) requests further information on how the existing constraints in the wastewater network in the vicinity are to be overcome. Further information was also requested in relation to the applicants' proposals for surface water drainage, including justification for the proposed use of underground attenuation in the site. No issues were raised in respect of flooding or water supply. Subsequent report (May 2025) cites no objection subject to condition. (condition 6 of the grant of permission relates).
- **Transportation:** - Initial report (June 2024) requests additional information on 5no. items as follows:
 1. Detailed design for the proposed new school entrance requested. Design to create a 'school street' environment that aligns with the principles of the NTA's 'Safe Routes to School Design Guide' and the NTA advice note titled 'Rapid Build SRTS Front of School Improvements Advice Note'; and to help deter ad-hoc carparking and drop-off adjacent to the entrance.
 2. Regarding the internal road layout, the applicants were requested to reconsider the proposed layout to remove the large set down area (save for buses and mobility impaired students) to encourage modal shift.
 3. Requested the applicants to further develop the Traffic and Transport Assessment and to clarify the trip generation figures contained in Figures 9, 10 and 12
 4. Requested the applicants to provide the full set of roads engineering drawings
 5. Requested the applicants to provide a swept path analysis drawing for a school bus, travelling from the existing junction on the Back Road to the grounds of the school.

Subsequent report (June 2025) cites no objection subject to condition. (conditions 4 and 12 of the grant of permission relate).

- **Parks and Green Infrastructure:** - Initial report (July 2024) cites no objection in principle. The report includes a request for additional information and includes recommended conditions in the event of a grant of permission. Subsequent report (June 2025) recommends conditions. (condition 5 of the grant of permission relates).
- **Public Lighting:** - Recommends conditions in respect of public lighting design. (condition 11 of the grant of permission relates).
- **Environmental Section (Waste Enforcement):** - Recommends a condition relating to the preparation of a Resource and Waste Management Plan (RWMP) (condition 10 of the grant of permission relates).
- **Heritage Officer:** - this report notes that the proposed development site was subject to previous archaeological investigation and desktop report (May 2019) and that no archaeological features were identified during the testing. However, the Heritage officer has regard to the scale of the proposal, the surrounding archaeological landscape and the recovery of archaeological finds in the area and considers that there is potential for the identification of archaeological remains outside of the test-trenches. Therefore, archaeological monitoring by a suitably qualified archaeologist is recommended. (condition 8 of the grant of permission relates).

3.3. Prescribed Bodies

- **Uisce Éireann:** - Initial report (June 2024) requests further information in the form of an updated Confirmation of Feasibility as the CoF submitted with the application was more than 6 months old. Subsequent report (May 2025) cites no objection subject to condition.
- **Iarnród Éireann:** - Made the following observations, to be incorporated as a condition of planning approval if the application is successful:

1) The Railway Safety Act 2005 places an obligation on any 3rd party working near the railway to ensure no danger or hazard is posed to railway operations. Due to the proximity of this site to the railway corridor, the Applicant must take due consideration of this obligation during the planning and construction of the development.

2) No additional liquid, either surface water or effluent shall be discharged to, or allow to seep onto, the railway property or into railway drains / ditches.

Since no drainage drawing was provided with the planning application, Iarnród Éireann requests further drawings to confirm that no liquid will discharge into the railway drains or ditches without prior agreement.

- **DAA:** - No objection subject to condition ensuring compliance with FDP Objective DAO-11

3.4. Third Party Observations

The planning authority received several third-party submissions. The issues raised are similar to those set out in the grounds of appeal and in the observations received and summarised in section 6 of this report.

4.0 Planning History:

4.1. Application site:

FCC Ref: F22A/0105:

Permission refused (April 2022) for the development of a primary school due to conflicting land use zoning designation under the Fingal Development Plan 2017-2023 and due to transport concerns as the PA was not satisfied (in the absence of sufficient information) that the development would enjoy adequate connectivity, that it would give rise to unsustainable travel patterns and be overly reliant on car-based travel.

4.2. Nearby Applications:

FCC Ref: LRD0043/S3E: Permission granted to Birchwell Developments Ltd (January 2025) for LRD on lands to the north of the proposed development site comprising the construction of

a total of 297 no. residential units, 1 no. childcare facility, 1 no. café/restaurant, 1 no. retail unit and 1 no. yoga studio

FCC Ref.F23A/0586: Permission granted (July 2024) for 71no. residential units on lands to the south of the proposed development site.

F24A/1059E Permission granted (Sept. 2025) for a retail supermarket on lands to the north of the proposed development site.
Currently under appeal under ACP-323546-25

4.3. Other Noted Applications:

A total of 259 residential units approved under the three planning applications referred to as Streamstown, Little Auburn and Auburn Park, on lands to the west of the R107, close to its junction with Back Road.

FCC Ref. F22A/0579 69 units in Streamstown

FCC Ref. F22A/0580 98 units in Little Auburn (includes the signalisation of the junction between R107 Malahide Road and Back Road

FCC Ref. F22A/0581 92 units in Auburn Park

5.0 Policy Context

5.1. Fingal County Development Plan 2023-2029

5.1.1. Land Use Zoning:

The proposed development site is subject to three land use zoning objectives as follows.

The main body of the site is zoned “**CI - Community Infrastructure**” with the objective to Provide for and protect civic, religious, community, education, health care and social infrastructure. The vision for this area seeks to Protect and promote an inclusive county, accessible to all members of the community, facilitating the sustainable development of necessary community, health, religious, educational, social and civic infrastructure. A wide range of different community facilities, civic facilities and social services exist within the County ranging from those of regional importance such as education and health facilities, to those of local and neighbourhood importance such as places of worship, community centres and childcare facilities. It is important to facilitate the development and expansion of such services in order to deliver a quality environment whilst improving the quality of life for all.

Access to the site is proposed through lands zoned ‘**OS’ - Open Space**’ and ‘**GB**’ – **Green Belt**.

The objective of the ‘**OS’ - Open Space**’ zoning is to *Preserve and provide for open space and recreational amenities*. The vision for the zone is to *Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority*.

The objective of the ‘**GB-Greenbelt**’ is to *protect and provide for a Greenbelt*. The vision for this area is to create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the

regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas

5.1.2. Map Based Objectives / Designations (Malahide - Portmarnock Sheet 9):

Local Objective Point: Local Objective No.52 which seeks to Provide for a new primary school at this location, subject to provision of adequate access arrangements

Specific Objective Point: Proposed School Site

Dublin Airport Noise Zone: Zone C

Landscape Character Type: Low lying agriculture:

5.1.3. Relevant Policies and Objectives:

Objective DAO11 – Requirement for Noise Insulation. Requires noise insulation in accordance with Table 8.1 above within Noise Zone B and Noise Zone C

Objective CIOSO18– Sites for Primary and Secondary Schools. Seeks to identify sites for schools in consultation with the Department of Education based on future population growth projections and in accordance with the Core Strategy and Settlement Hierarchy

Objective CIOSO19 – Additional Schools. Seeks to facilitate the development of additional schools in partnership with the Department of Education and Skills and/or other bodies.

Objective CIOSO20 – Design of Schools. Requires new schools and other education centres to meet the Council's standards regarding quality of design with an emphasis on contemporary design, landscaping and vehicular movement and vehicular parking.

Objective CIOSO21 – Multiple Usage of School Buildings. Seeks to promotes and encourages the multiple usage of school buildings and associated infrastructure

Objective CIOSO22 – School Streets Principles: Requires new schools to be designed in accordance with 'School Streets' principles incorporating traffic free, clean air zones around schools either permanently or on a time-controlled basis coinciding with school opening and closing times wherever possible.

Policy CMP15 - Safe Routes to School. Seeks to promote walking and cycling for school trips through support and engagement with the 'Safe Routes to School' and the 'Green Schools Travel Programme'

Objective CMO22 - Safe Routes to School Measures. Seeks to promote walking and cycling for school trips by implementing the following measures:

- Identifying school sites that are as close as possible to the communities they serve.
- Ensuring new schools are designed with an emphasis on active travel and facilitation of same.
- Ensuring that adequate and secure bicycle storage is provided within schools.
- Prioritising school routes for permeability projects including the potential for shorter and safer routes to schools by the removal of physical barriers to active movement and provision and enhancement of pedestrian and cycle ways.
- Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools, including the implementation of the Safe Routes to School Programme.
- Ensuring that suitable access points are provided to school sites for pedestrians and cyclists

Policy CMP1. – Decarbonisation of Motorised Transport. Seeks to support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.

Policy SPQHP49 – Preservation of Greenbelts. Recognise the importance of and preserve greenbelts in Fingal in order to safeguard valuable countryside to ensure that existing urban areas within Fingal do not coalesce enabling citizens to enjoy the County's natural amenities and to strengthen and consolidate greenbelts around key settlements.

5.1.4. Development Management Standards.

Chapter 14 contains relevant development management standards including standards on Educational Facilities (section 14.14.3) car parking provision (Section 14.17.7 Car Parking, Table 14.18 and Objective DMSO119), Cycle Parking (Section 14.17.2.1, Table 14.17 and Objective DMSO109) and Mobility Management (Section 6.5.5 and Policy CMPS)

5.2. **National Policy:**

National Planning Framework First Revision, April 2025

Notably section 6.5 and National Policy Objective 41 which seeks to prioritise the alignment of targeted and planned population and employment growth with investment in (inter alia), the provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;

5.3. **Other:**

Regard is had to:

- The Provision of Schools & the Planning System – A code of Practice for Planning Authorities, the Department of Education & Science and the Department of the Environment, Heritage and Local Government, July 2008.
- Greater Dublin Area Transport Strategy 2022-2042
- Greater Dublin Area Cycle Network Plan (2022)
- Design Manual for Urban Roads and Streets (DMURS) (2019)
- ‘Safe Routes to School Design Guide (NTA)

5.4. **Natural Heritage Designations**

- 5.4.1. The site is not within or directly adjacent to any European Site. The closest European Sites are located approx. 1.6km to the north and are associated with the

Malahide Estuary, these are the Malahide Estuary SPA and SAC. The Baldoyle Bay SAC and SPA are located c.2.3km to the south of the site. The Sluice River Marsh pNHA is located c.1.2km to the site and Feltrim Hill pNHA is located c1.5km to the west.

6.0 The Appeal

6.1. 2 no. valid appeals were received from Brian Nolan, a resident of Broomfield, Malahide, and from Zoe and Ronan Palmer, on behalf of the residents of Ashwood Hall (a list of those represented is included in the appeal document). Both appeals raise similar issues, with the main areas of concern relating to traffic, transport and sustainable travel.

6.2. Grounds of Appeal (GoA):

Principle of Development / Zoning:

- The subject site was zoned for community use after the surrounding residential infrastructure had been designed and developed, indicating poor planning.

Inadequate Road and Transport Infrastructure including Public Transport:

- The surrounding road network (including, Back Road and Kinsealy Lane) is under considerable strain and is due to face greater pressure from approved and pending developments, including a 297-unit LRD scheme (F23A/0586). The proposed development would exacerbate congestion already experienced in the area, particularly in accessing Malahide village.
- Existing internal estate roads were not designed to accommodate significant volumes of school related traffic. They are narrow, winding and frequently impacted by on-street parking, making them wholly inadequate for large vehicle manoeuvres or two-way flows.
- The Ashwood Hall estate is served by a single entrance off Back Road, this entrance is already a pinch point, incapable of safely handling two-way traffic. The addition of school traffic would result in congestion, obstruct emergency access and pose unacceptable risks to the safety of pedestrians and cyclists.

- Cumulative impacts have not been properly assessed.
- Inadequate junction design at proposed school entrance
- Pedestrian and cycle infrastructure in the area is inadequate. The existing footpath on the Ashwood Hall side of Back Road measures between 0.9 and 1.09m in width, below DMURS minimum standard of 1.8m.
- Bleeper bikes are an adult rental scheme, unsuitable for use by children. The use of Go-Cars is unrealistic.
- The area is not directly served by public transport, with the nearest bus stop located c1.1km away. Malahide Train Station is 1.9km away.
- If permitted, dedicated and safe access should be provided through the LRD development and via the Hazelbrook development to ensure that traffic is properly dispersed, pedestrian routes are safe and accessible from all directions, and no single residential area is disproportionately impacted.
- The new through road from the new development south of Brookfield linking Back Road to Kinsealy Lane, will add additional traffic to Brookfield

Flawed Traffic and Transport Assessment (TTA):

- Concerns are raised regarding the validity, methodology and conclusions of the TTA submitted in support of the application. It is contended that this document contains multiple inaccuracies, outdated data and unfounded assumptions that significantly undermined its credibility.
- The TTA relies on aspirational projections, incomplete infrastructure assessment and speculative behavioral trends. It underestimates car dependency, overestimates sustainable transport uptake and fails to account for critical local context, including school preferences, walking safety, and actual usage of public transport and cycle infrastructure.
- It lacks credible mitigation to manage traffic, ensure pedestrian safety or prevent illegal parking.

- The TTA relies on UK guidance for journeys on foot, which is not applicable to the Irish planning context, and is more relevant to adult journeys rather than those undertaken by children. Given the 9km catchment area, the suggestion that children could reasonably walk is impractical and unsafe.
- The traffic analysis places an overreliance on PICADY modeling.

Incomplete Swept -Path Analysis:

- It is contended that the applicants swept-path analysis is deficient and fails to demonstrate that school bus movements can be safely or realistically accommodated within the estate.
- It omits essential traffic interactions, relies on idealized and obstruction free scenarios, and disregards the daily realities of a functioning residential area including parked vehicles, two-way traffic flows, high pedestrian activity and cycle presence.
- Key maneuvers such as reversing into bus parking space, exiting the site, and accessing from multiple directions are either ignored or inadequately modeled.
- Without complete evidence based and safety led assessment of vehicle movements, a transport plan cannot be considered sound or acceptable.

Inadequate Drop-off and Parking Issues:

- The quantum of parking and drop-off spaces proposed is considered insufficient for the number of pupils (440) and staff (36). There is a concern that this may result in overflow / ad-hoc parking on the surrounding road network, inconveniencing residents and obstructing emergency vehicles. Reference is made to existing traffic management and parking issues at schools in the locality.
- No provision is made for parents of children with special needs.
- The removal of all-drop off spaces, as recommended by the Transport Planning Section, ignores the realities of child travel needs and special education access.
- The provision of 280 bicycle spaces is excessive given that census data shows only 2.5% of school children cycle. It does not reflect local travel patterns and appears to be included purely to improve the perception of sustainability.

Amenity Impacts:

- The proposed development would cause daily disruption for residents, in terms of traffic congestion, blocked driveways.
- It would result in noise and pollution and loss of privacy for residents
- The multipurpose hall should not be permitted for evening activities due to adverse impact on residents.
- The development would alter the character of the area.

Other:

- It is contended that planning permission was granted before the applicant was required to submit critical information on issues relating to transportation, water services infrastructure and legal land ownership. The proposal development cannot safely or appropriately proceed without full clarification and assessment of the information requested.
- Previous refusal reasons, lack of public transport access and inadequate vehicular movement and vehicular parking design, have not been adequately addressed.

6.3. Applicant Response:

The applicant's response to the issues raised in the grounds of appeal is set out in documents received on the 28th of July 2025 and the 11th of August 2025. The appeal response documents address the key issues raised in both third-party appeals under various headings; these are summarised below. Both submissions are accompanied by supplementary reports by the project engineers, Waterman Moylan.

Planning Policy Compliance:

- The proposed development has been prepared in full alignment with national, regional and local planning policy and responds directly to the identified educational and infrastructural needs of the area.
- The subject site is zoned for community infrastructure and is subject to site-specific designations which support the provision of educational development. The zoning of the site was subject to a statutory development plan process which

included public consultation. It was deliberate, evidenced based, and aligned with long-term strategic planning for social infrastructure provision.

- Further to the zoning objective and site-specific designations, the development also satisfies the broader policy aims of the FCDP concerning community infrastructure provision.

Traffic and Transport Assessment Issues:

- The applicants refute any assertion that the planning application has not been subject to rigorous and professional assessment in relation to road safety and traffic hazard.
- The proposed scheme has been designed in accordance with the principles of the Design Manual for Urban Roads and Streets (DMURS) and a Road Safety Audit undertaken. A full traffic and Transport Assessment (TAA) Accompanied the application. FCC traffic and Transport Engineers raised no objection to the scheme on safety grounds. It is contended that a degree of professional deference should be afforded to the conclusions of the appropriately qualified experts who have confirmed the acceptability of the project.
- The TTA was carried out in line with TAA guidance and FDP Objective DMSO113. It is based on detailed traffic surveys and includes a comprehensive modelling exercise. The analysis takes account of committed and potential future developments in the area.
- Regarding concerns around the safety and practicality of walking and cycling routes to the school, these are addressed through both existing infrastructure and planned upgrades. The surrounding road network already includes a well-connected footpath system, and it is noted that the lowering of the default speed limit on rural local roads (including Kilsealy Lane) to 60km supports a safer environment for active travel.
- The proposal includes 280no. secure cycle parking spaces and aligns with the Greater Dublin Area Cycle Network Plan 2022, which identifies future primary, secondary and feeder routes in close proximity.
- The appellants note that Ashwood Hall is 1km from St. Oliver Plunkett N.S and that children from the estate walk or scoot to school. The proposed school is

located within a similar walking distance and along comparable infrastructure. The proposed development is located close to its intended catchment area and is therefore well placed to encourage similar walking patterns.

- While the immediate area is not served by public transport services, it is within walking distance of multiple bus routes (1.3km / 17-minute walk to nearest bus stop) and Malahide Dart station (1.8km / 24-minute walk). While it is suggested in the GoA that these distances are prohibitive, there are consistent national standards for walkable access to public transport.
- The application is accompanied by a 'School Travel Plan' the objective of which is to promote a modal shift from private car use towards active travel. As new residential units are delivered in the immediate vicinity it is expected that the school's intake will increasingly come from the local community immediately adjoining the school site.
- Parking and drop-off arrangements accord with FDP standards. The internal road and parking layout has been carefully designed to manage circulation efficiently, avoiding the need for turning in nearby estate and discouraging unauthorised use of private driveways.
- Regarding the adequacy of the existing road network, existing estate roads in Brookfield and Ashwood Hall have a carriageway width of 5.5m in line with DMURS, which encourages narrower carriageways as a form of passive traffic calming. The submitted swept path analysis confirms that buses can pass through the route without the need for road widening or encroachment onto private property.
- The school entrance junction is designed in line with NTA Safe Route to School Design Guide (2022). The flexible pencil bollards are positioned so as not to narrow the carriageway or obstruct access to emergency vehicles. Their purpose is to prevent illegal parking on pedestrian routes and to improve safety at the school access point.
- The new through road from the new development south of Brookfield linking Back Road to Kinsealy Lane, was considered in the traffic modelling.

Impact on Residential Amenity:

- The impact of the proposed development on residential amenity was carefully considered from the outset of the design process as evidenced by the suite of technical documentation submitted with the application.
- It is submitted that the proposed development has been designed in a manner that minimises potential impacts on the amenity of nearby residents and accords with relevant planning standards.
- Regarding impacts associated with school traffic, it is contended that the proposed access arrangements have been subject to detailed assessment and have been found to be acceptable by FCC. While it is acknowledged that, by its nature the proposed school would give rise to short bursts of activity, these are seasonal and would be of limited duration and would not give rise to an unacceptable level of impact on residential amenity.
- The development constitutes a vital piece of social infrastructure that will serve the wider community and has been designed to do so in a sensitive and contextually appropriate manner.

Comparison to Other Schools in the Locality

- While comparisons are made in the GoA to other local schools, namely Oliver Plunkett Primary School and Malahide / Portmarnock Educate Together, the current proposal differs significantly in its layout and operational design.
- The proposal avoids reliance on on-street drop-off by providing a controlled and managed internal drop-off zone, integrated traffic calming measures and designated travel demand management system.
- The proposed school facility is urgently required. It has been strategically planned to meet both current and future demand for primary school places in the area. In addition, the proposal includes a much-needed Special Educational Needs (SEN) unit.

Planning Application History:

- The two reasons cited for refusal under the previous application, FCC Ref: F22A/0105 have been adequately addressed.

- The previous application was assessed against the Fingal Development Plan 2017-2023 which has since been superseded by the Fingal Development Plan 2023-2029.
- The land use zoning objective pertaining to the site was changed following the adoption of the FDP 2023-2029, therefore this reason for refusal is no longer applicable. Local Objective 52 to provide a new primary school at this location, was introduced, confirming the suitability of the site for a new school.
- Planned improvements works under the Greater Dublin Area Cycle Network Plan will significantly enhance cyclist accessibility to the proposed school.
- The school has been designed to promote active travel and includes a robust and proactive mobility management strategy.

6.4. Planning Authority Response

- The application was assessed against the policies and objectives of the Fingal Development Plan 2023 - 2029 and existing government policy and guidelines.
- The development was assessed having regard to the development plan zoning objective since the previous refusal on site. The FDP 2023-2029 has been adopted, and the site zoning is now 'CI - Community Infrastructure'. There is a specific local objective No. 52 to provide a new primary school at this location. As stated in the initial planning report, the planning authority is supportive of the provision of necessary social infrastructure to serve the surrounding emerging in residential areas including the recent grant permission of a large-scale residential development to the north of the site.
- Additional information regarding transportation, water services, parks and landscaping, was requested during the assessment of the proposed development. Additional revised site layout drawings and updated TAA were submitted and deemed to be acceptable by the planning section.
- The planning authority requests that An Coimisiún Pleanála uphold the decision of the planning authority to grant permission.

6.5. Observations

2 no. observations received from residents of Ashwood Hall, under the names Simon Carbery and Fiona O'Connor and David Magee. The issues raised are covered in the grounds of appeal and can be summarised as follows:

- Unrealistic Transport Assessment and Inaccurate assumptions
- Inadequate drop-off and parking facilities
- Unsuitable road layout for school traffic
- Unsafe school entrance design
- Precedent from similar local schools
- Lack of mitigation measures
- Environmental and community impacts
- Ignored previous planning refusals
- Conflict with Safe Routes to School (SRTS) Design Principles

6.6. Further Responses

None

7.0 Assessment

7.1. Introduction

- 7.1.1. Having examined the application details and all other documentation on file, including all the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issue raised by third parties as residents of the area relates to traffic and transportation, in particular, the nature and volume of traffic likely to be generated by the proposed school development and its impact, alone and cumulatively with other large developments in the area, on the local road network and on neighbouring properties.
- 7.1.2. As set out in section 6 above, several issues have been raised including:

- The robustness of the applicants Traffic and Transport Assessment (TTA)
- The adequacy (design and capacity) of the local road network, in particular the Broomfield access road and its junctions to cater for the proposed school traffic.
- The lack of adequate pedestrian and cycle connectivity to the site and its distance from public transport.
- Inadequate parking and drop-off / set-down area resulting in overflow traffic to surrounding residential estates.

7.1.3. I propose to consider the issues raised under the following headings:

- Principle of Development
- Adequacy of the Local Road Network (Design)
- Traffic and Transport Assessment and Capacity Analysis
- Connectivity
- Access and Internal Road Layout
- Parking / Drop-off Facilities
- Other Matters:

7.2. Principle of Development:

7.2.1. The appeal site is located within the settlement boundary of Malahide, which is designated as a Self-Sustaining Town in the RSES and Fingal Development Plan 2023-2029 (FDP). Self-Sustaining Towns are characterised as having high levels of population growth and a weak employment base. To become more sustainable, these settlements require contained growth with a focus on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.

7.2.2. The growth strategy for Malahide is set out in Chapter 2 of the Fingal Development Plan 2023-2029 (FDP). In accordance with Table 2.14 Core Strategy, Malahide had a recorded population of 17,053 in 2016 and an estimated population of 17,906 in 2023. The population of the settlement is expected to grow by c.1,622 persons to 19,528 by 2029. Additional services and amenities, including educational facilities

will be required in the area to accommodate this growth in a sustainable manner. In this regard I draw the attention of the Commission to NPO 41 of the National Planning Framework, First Revision, which seeks to prioritise the alignment of targeted and planned population and employment growth with investment in (inter alia) the provision of new and refurbished schools on well-located sites within or close to existing built-up areas. In accordance with the information submitted with the application, the proposed school will provide a permanent home for Malahide-Portmarnock Educate Together National School, who are currently operating from temporary accommodation in Kinsealy. The school is intended to serve existing and planned future housing developments in the vicinity, which would include the permitted LRD development to the north (*FCC Ref: LRD0043/S3E*).

7.2.3. The proposed development site encompasses three land use zoning objectives. The main body of the site, containing the school and its associated playing fields, amenity areas and parking facilities etc, is zoned '*CI Community Infrastructure*' with the objective to provide for and protect civic, religious, community, education, health care and social infrastructure. Educational facilities are permitted in principle within this zoning. These lands are also subject to '*Local Objective No.52*' which seeks to provide for a new primary school at this location, subject to provision of adequate access arrangements. It is evident that the development of these lands for a new school is envisaged in the plan.

7.2.4. Access to the school site is proposed via a new access road, with segregated pedestrian and cycle lanes, from the existing estate road to the west. The proposed access traverses land zoned '*OS Open space*' and '*GB -Greenbelt*'. The objective and vision for these zonings is described in section 5.1.1 above. In terms of compliance with the '*OS Open space*' and '*GB -Greenbelt*' zoning objectives. I note that 'Road infrastructure' or similar is not listed as a separate land use class in the FDP. I consider it reasonable to assume that such works are acceptable in principle under all zoning objectives provided that they are ancillary to and necessary for the development and / or use of land as envisaged in the plan.

7.2.5. The OS zoned lands within the development site comprise part of a narrow strip of land located between the Broomfield access road and the boundary between the

Brookfield residential development and adjoining GB zoned lands. The area comprises a wide grassed verge that is bisected by a pedestrian footpath along its western edge. A new pedestrian and cycle path is to be developed in the area under FCC Ref. F23A/0586. The proposed development would see the extension of the planned pedestrian and cycle paths into the school site along with additional hard surfaced area facilitating vehicular access. The area would be retained as part of the public realm and would continue to facilitate pedestrian movements through Brookfield. While the proposed works would result in the loss of a small section of the existing grassed area, the area concerned is limited in terms of its size and amenity value and I do not consider its loss would have a serious impact on either the residential or visual amenities of the area. The green area lost would be compensated by the provision of a new green area within the development site, to the north of the access road.

7.2.6. The proposed development site encompasses a small linear section of GB zoned lands bounded by OS zoned lands to the west, CI zoned lands to the east and 'RA' - residential zoned lands to the north. It is an objective of the FDP (Objective SPQHO102) to *promote development within the Greenbelts which has a demonstrated need for such a location, and which protects and promotes the permanency of the Greenbelt, and the open and rural character of the area.* In this instance, I am satisfied that the proposed road infrastructure on both 'GB -Greenbelt' and OS Open space' zoned land within the development site is required to facilitate the development of the 'CI' Zoned land for a primary school as envisaged in the FDP. The extent of the works proposed within these zonings is relatively minor in nature and extent and the works would in my opinion provide a suitable transition between the residential and community zoned lands to the north, west and east and the wider expanse of GB lands to the south. In my opinion the proposal would accord with the requirements of Objective SPQHO102.

7.2.7. In conclusion, having regard to National, Regional and Local Planning Policy on school provision, to the population projection for the settlement and the zoning objectives for the site as set out in the Fingal Development Plan 2023-2029, it is my considered opinion that the development of new primary school at this location is justified and is acceptable in principle.

Retrospective Zoning

- 7.2.8. Notwithstanding the above, I note the concerns raised by third party's regarding the zoning and designation of the lands for a primary school after the surrounding residential infrastructure had been designed and developed and after the decision to refuse permission for a school under FCC Ref: F22A/0105. It is contended that the retrospective zoning does not reflect sustainable development or best practice in urban planning. In response, I note that the zoning of land in the Fingal Development Plan 2023-2029 was subject to a formal statutory process that included public consultation, and which resulted in the subject lands being identified as a suitable location for a new primary school subject to appropriate access arrangements. The proposed access arrangements are to be considered in the following sections of this report.

7.3. Adequacy of Existing Road Network (Design)

- 7.3.1. The proposed development site is in the Broomfield area of Malahide c1.5km south of main street. The main access to the proposed school site is from Back Road via a newly constructed road referred to in the application documentation as the Broomfield access road.
- 7.3.2. The Broomfield access road is a single carriageway road designed to a carriageway width of 5.5m. It currently runs north-south for approximately 1km, linking the newly constructed residential developments of Brookfield and Ashwood Hall with Back Road to the north. The Broomfield access road will become a through road linking Back Road with Kinsealy Lane via Hazelbrook to the southeast as part of the residential development permitted under FCC Ref. F23A/0586. While open and operational, the existing section of the Broomfield access road awaits its final wearing course and has not yet been taken in charge (as per the report of the Transportation Planning Section). It is intended that this road will also provide access to the recently permitted LRD under *FCC Ref: LRD0043/S3E* and to the proposed commercial development under FCC Ref: F24A/1059E (currently under appeal, *ACP-323546-25*).

- 7.3.3. Back Road is a single carriageway road that runs generally east-west for approximately 1.8km between Malahide Road (R107) to the west and the Hill Road (R124) to the east. Back Road, which crosses the railway line via an existing bridge, currently comprises a carriageway of approximately 7.30m with footpaths running along the road. To the west of the railway line, the speed limit on Back Road is 60kph reducing to 50kph just before the railway bridge. Kinsealy Lane is a single carriageway road that runs north-south for approximately for 1.8km between Back Road to the north and Chapel Road at Kinsealy to the south. This road is subject to a speed limit of 50kph and comprises footpaths running along the road.
- 7.3.4. Concerns have been raised in the grounds of appeal regarding the adequacy of the Broomfield access road in terms of width, alignment and junction design, to accommodate traffic associated with a large school development.
- 7.3.5. As noted by the Transportation Planning Section in their report to the PA (July 2024) the Bloomfield access road has been designed to accord with the principals of the Design Manual for Urban Roads and Streets, providing a low speed (30kph) environment. I note that low speed environments encourage sustainable transport choices.
- 7.3.6. A swept-path analysis (Drawing No. P1151) was submitted at RFI stage to illustrate that this road can accommodate bus movements to the school site, with opposing traffic and with residential parking present. The Transportation Planning Section raised no objections or concerns in relation to the submitted document. Additional swept-path analyses have been submitted as part of the applicant's appeal response to illustrate school bus movements south towards the Hazelbrook exit onto Kilsealy Lane and at the junction of the Broomfield access road and Back Road. I have reviewed the submitted swept-path analyses and visited the area and I am satisfied that the Broomfield access road and its associated junctions are sufficient in width and design to accommodate bus movements to the school site within the norms of an urban low-speed environment. As noted by the applicants, most school bus movements will occur during designated drop-off and collection times. Therefore, any potential conflict, for example with parked cars or large opposing vehicles, would be within a limited timeframe and only during school term. In my opinion, any such

conflict, should it arise, is unlikely to have a significant impact on the road network or on traffic movements.

- 7.3.7. In conclusion, I am satisfied that it has been demonstrated in the application and appeal that school traffic / buses can safely navigate the local road network. The capacity of the local road network to accommodate the volume of school traffic is considered under the heading Traffic and Transport Assessment.

7.4. Traffic and Transport Assessment.

- 7.4.1. The impact of the proposed school development on the local road network is assessed in the Traffic and Transport Assessment (TTA) submitted with the application and updated at RFI stage. For clarification, it is the updated TTA that forms the basis for this assessment.
- 7.4.2. The TTA examines the existing traffic and transportation conditions, including baseline traffic conditions and available sustainable modes of transport in the area. I note reference in the TTA to the availability of Bleeper Bikes and Go-Car services in the area and the concerns raised by third parties regarding the unsuitability of these services to benefit a primary school development. While I accept that these transport services are unlikely to be a mode of choice for school traffic, I believe that they are referenced in the TTA for information purposes only and are not relied upon in the assessment.
- 7.4.3. Committed and potential future developments in the area are discussed in section 6. The Commission will note that since the preparation of the TTA, construction on the residential development permitted under FCC Ref: F23A/0586 to the south of the development site has commenced; permission has been granted for the LRD proposed under FCC Ref: LRD0043/S2 and the commercial development (supermarket) proposed under FCC Ref F24A/1059E, is currently under appeal having been granted by FCC.

Existing Travel Patterns / Modal Split:

- 7.4.4. Existing travel patterns in the area are discussed in section 7. The TTA uses data from the 2022 Census to determine the existing modal split for a selected area surrounding the site, in terms of travel to school, collage and childcare. The results, along with Fingal's overall modal split for travelling to school (as per the report of the Transportation Planning Section, June 2024) are set out in table 7.1 below.
- 7.4.5. The TTA assumes a similar model split at the subject location while also noting that the percentage of car users is likely to decrease with the growth of residential development in the area, as residents of the area will likely elect to walk to the site. The TTA's target modal split figures reflect this assumption. The table below provides a comparison between the modal split for the surveyed area, the target modal split of the subject development and the overall modal split for Fingal.

	Modal Split %		
Journey Type	Fingal	Surveyed Area	TTA Target
Private Car	40	50	40
Pedestrian	40	26	30
Bus	5	9	10
Train	>1	9.1	10
Cyclists	4.4	2.5	10

Table 7.1: Modal Split

- 7.4.6. Third parties contend that the TTA's modal split targets are unrealistic given the large catchment area for the school, the lack of adequate pedestrian and cycle infrastructure in the area and the age group concerned.
- 7.4.7. As indicated in the above table, the applicants' modal split targets include a 10% reduction in private car trips in favour of walking and cycling by year 9 (full occupancy). The applicant's strategy to support this shift is set out in the 'School Travel Plan' submitted with the application. This strategy supports the implementation of various initiatives such as carpooling and 'park and stride'. A Travel Manager is to be appointed to oversee the implementation of the plan. In my

opinion the measures outlined in this plan are reasonable. The applicants Modal Shift Targets assume only a minimal increase in travel by bus and rail above the surveyed data, I consider this to be a realistic assumption given the nature of the development as a primary school and its distance from such services. In my opinion, the modal shift targets set out in the TTA are reasonable given the surveyed data, the nature of the development proposed and its proximity to existing and planned future residential development.

Traffic Generation and Distribution:

- 7.4.8. To determine baseline traffic conditions, a traffic survey was conducted on Wednesday 7th February 2024 for the period of 24 hours. The survey was conducted at five junctions, Junctions 1 to 5 as detailed on table 7.2 below.
- 7.4.9. The survey established that morning peak traffic occurs between 08:15 and 09:15 at junctions 1, 2 and 3, between 08:00 and 09:00 at junction 4, and between 07:45 and 08:45 at junction 5. In the afternoon, all junctions peak between 17:00 and 18:00, except for Junction 3, which has a peak between 16:00 and 17:00 in the afternoon.
- 7.4.10. The TTA also considered the results of a previous traffic survey conducted at the same junctions in September 2021 for the Broomfield SHD application (ABP-313361-22). The TTA states that the results of both traffic surveys indicate that the traffic volumes surveyed in 2024, when compared to 2021, are within the normal parameters of expected growth.
- 7.4.11. In consideration of the typical school schedule, the TTA only considers trips generation and distribution during the morning, which coincides with the existing AM peak hour in the road network. I consider this to be an acceptable approach, as the majority of end of day trips (school collections) are likely to occur outside of the PM peak (i.e. prior to 4pm.) and thus are unlikely to have any notable impact on traffic movements.
- 7.4.12. The TTA estimates that the proposed school when fully occupied (year 9) will generate a total of 178 no. car trips during the AM peak. While I note that the TTAs

trip generation figures have been disputed in the grounds of appeal, I am satisfied that the figures cited have been adequately justified and have been shown to have been derived from detailed assessment in line with best practice guidelines.

7.4.13. In terms of trip distribution, the TTA considers that 20% of the total car trips to/from the primary school will be made by residents of the adjacent area (Broomfield Northern Developments, Ashwood Hall and Brookfield Development and Broomfield South Development) while the remaining 80% will arrive from more distant neighbourhoods. Of the 80% that arrives from distant neighbourhoods, the TTA assumes that 70% of trips will use the Back Road access, with the remaining 10% using the Kinsealy Lane access, via Broomfield Southern Site.

7.4.14. The TTA in section 8.2, determines the expected trips generated by existing, committed and potential future developments in the area namely, the Ashwood Hall and Brookfield developments, the residential development permitted under F23A/0586; the permitted Streamstown /Little Auburn / Auburn Park developments; the permitted LRD Development (*FCC Ref: LRD0043/S3E*) and the commercial development, the subject of ACP-323546-25. The TTA estimates that these developments would generate a total of 624 trips during the AM peak.

Junction Analysis

7.4.15. In line with TII Guidance, an assessment was then carried out to determine the potential level of impact from the proposed development on six key junctions in the locality, see table 7.2 below.

Junction	Description
1	Existing priority T-Junction located at the intersection of Malahide Road (R107) and Back Road. <i>Note: Signalisation of Junction 1 permitted under Grant Permission ABP Reg. Ref. 316498-23</i>
2	Existing priority T-Junction located at the intersection of Back Road and Kilsealy Lane

3	Existing priority T-Junction located at the intersection of Back Road and Broomfield Access Road
4	Existing Priority T-Junction located at the intersection of the Hill (R124) and Back Road. <i>Note: Signalisation of Junction 4 permitted under FCC Ref: LRD0043/S3E</i>
5	Existing Priority T-Junction located at the intersection of Kinsealy Lane and Hazelbrook Access Road.
6	Existing priority-controlled T-junction located to the northeast of the proposed development site on Broomfield access road.

Table 7.2: List of Survey and Analysed Junctions

7.4.16. The results of the analysis show that Junctions 2, 3, 5 & 6 are expected to experience a two-way traffic increase of more than 5% during the AM peak hour. Junctions 1 and 4 are expected to have a traffic increase of less than 5% during the AM peak. The performance of all junctions was assessed for the following scenarios:

- DO NOTHING 2026 (DN-2026): 2024 surveyed flows factored up + traffic to/from the committed Ashwood Hall, Brookfield and Broomfield Southern Site developments.
- DO NOTHING 2031 (DN-2031): 2024 surveyed flows factored up + traffic to/from the committed developments: Ashwood Hall, Brookfield, Broomfield Southern Site and Streamstown + the Potential Future developments: Broomfield Northern Lands and Commercial Area.
- DO NOTHING 2041 (DN-2041): 2024 surveyed flows factored up + traffic to/from the committed developments: Ashwood Hall, Brookfield, Broomfield Southern Site and Streamstown + the Potential Future developments: Broomfield Northern Lands and Commercial Area.
- Do SOMETHING 2026 (DS-2026): DN-2026 + traffic to/from the Subject Development.
- Do SOMETHING 2031 (DS-2031): DN-2031 + traffic to/from the Subject Development.
- Do SOMETHING 2041 (DS-2041): DN-2041 + traffic to/from the Subject Development

- 7.4.17. The modelling results show that Junctions 1, 2, 3, 5 and 6 would operate within capacity for all scenarios assessed. The same results are obtained with the proposed upgrade of Junction 1 to a signalised controlled T-junction. The modelling results for Junction 4 show that in its current configuration, the junction would operate within capacity but with delays in 2026 DO SOMETHING (DS-2026) scenario. However, with the addition of traffic signals at Junction 4, the junction would operate within its capacity in 2031 DO SOMETHING (DS-2031) scenario and would continue to do so for in 2041 DO SOMEHTING (DS-2041) scenario.
- 7.4.18. I have considered the TTA, I am satisfied that it provides a robust and cumulative assessment of the local road network, in line with best practice and the requirements of the Fingal Development Plan 2023-2029. I have no objection to the methodology used or assumptions made within the TTA, which I consider reasonable and justified. Furthermore, I am satisfied that the traffic analysis results presented in this report, demonstrate that the local road network can accommodate the volume of traffic likely to be generated by the proposed development, on its and in combination with other permitted / planned development in the area. Therefore, on the basis of the information available, I am satisfied that the proposed development would not result in or contribute to congestion on the local road network to a degree that would significantly impact the amenities of residents.

7.5. Connectivity

- 7.5.1. Concerns have been raised in the appeal regarding the lack of adequate pedestrian and cycle facilities in the area to support the proposed school development and the achievement of the applicants' modal split targets. Conversely, the applicants contends that existing pedestrian infrastructure in the surrounding urban area comprises a well-connected network of footpaths that link the various neighbourhoods to one another, to existing educational institutions and to the public transport network. They note that existing infrastructure is currently utilised by families of Ashwood Hall and Brookfield to successfully walk / cycle / scoot to St. Oliver Plunkett N.S, which located c1.3 km to the northeast.
- 7.5.2. I have visited the site and the surrounding area, and I have utilised and observed existing pedestrian facilities in the vicinity of the site including those on Back Road

and Kinsealy Lane. Overall, I am satisfied that the site is well connected in terms of pedestrian infrastructure to neighbouring residential area and to the wider urban area of Malahide. I note the proximity of the site to Malahide Demesne and its network of offroad paths, linking the proposed school site and wider Broomfield area to the centre of Malahide, providing an alternative route for pedestrians. I also note the presence of large parking areas within the Demesne grounds, including one within 800m of the proposed development site, which have been identified as suitable locations for '*Park and Stride*', an initiative that will be supported through the applicant's School Travel Plan.

7.5.3. The area is currently deficient in terms of cycle infrastructure; save for existing cycle routes within Malahide Demesne. However, I note that a new off-road pedestrian / cycle track is proposed as part of the development permitted under FCC Ref. F23A/0586 (currently under construction). This track will link the existing entrance on Back Road to Kilsealy Lane via the Ashwood Hall and Brookfield estates, passing the main school entrance. Once completed it will provide a good level of cycle connectivity to the school, within the immediate residential area. In the wider context I note that improvements to cycle infrastructure on both Back Road and Kinsealy Lane are planned as part of the NTA's GDA Cycle Network Plan, 2022; however, I accept that these works are aspirational and cannot be relied upon.

7.5.4. Overall, I am satisfied that the proposed school site is adequately located in terms of connectivity.

7.6. Access and Internal Road Network

7.6.1. Access to the school site is proposed via a new entrance off the Broomfield access road, east of the Brookfield development, creating a four-way junction with the cul-de-sac serving No's 1-10 Brookfield. The proposed access arrangements include separate pedestrian and cycle paths that have been designed to connect with planned pedestrian and cycle infrastructure in Brookfield. Following site inspection and a review of the plans submitted with the application and appeal, including the applicant's swept-path analysis, I am satisfied that adequate sightlines can be

achieved at location of the proposed new vehicular entrance and that buses can access / egress safely at this point.

- 7.6.2. The design detail of the entrance was enhanced at RFI stage to greater align with the principles of NTA's 'Safe Routes 'To School Design Guide', with the introduction of a raised table, bollards, road markings and signage. The Transportation Planning Section in their report to the planning authority (June 2025) cited no objection to the design in principle; however they did request that the final details and layout of all works proposed for the area surrounding the entrance to the proposed development, including all proposed road surfaces, ramps, road markings, signage and flexible pencil bollards; be agreed in writing prior to commencement of development.
- 7.6.3. Concerns have been raised in the appeal regarding the proposed use of bollards at the school entrance along the Bloomfield access road on the grounds that they would reduce the junction width creating a bottleneck at peak times. In response, the applicants have clarified that the placement of bollards will not reduce the dimensions of the existing roads and that their intended purpose is to discourage illegal parking thereby enhancing pedestrian safety and reducing traffic congestion.
- 7.6.4. The proposed internal road layout includes a circulatory route around the proposed parking area with a two-lane, one-way system facilitating access to designated drop-off spaces for buses and cars. This arrangement will allow ease of access though the site, avoiding congestion. I note that the applicants have clarified that bus drop-off spaces have been designed to allow buses to access / egress without the need to reverse, improving safety of traffic movements within the school environment.
- 7.6.5. In conclusion, I have no objection in principle to the proposed access arrangements or internal layout.

7.7. Parking and Drop-off Facilities

- 7.7.1. Third parties have raised concerns in relation to the quantum of car parking and drop-off spaces proposed, which they consider insufficient and likely to result in ad-hoc parking in surrounding residential areas, causing congestion and significant

disruption to residents, as currently experienced at the site of existing Malahide / Portmarnock Educate Together in Kilsealy.

Car-Parking

7.7.2. The car parking standards for Fingal are set out in Section 14.17.1 of the FDP 2023-2029. The Plan provides for the creation of two distinct parking zones to ensure adequate residential parking provision and the control of destination car parking. The FDP states that this approach allows greater flexibility in the application of car parking standards on sites in areas with varying levels of road and public transport provision. The two zones are detailed in Table 14.18 as follows:

- Zone 1: Relates to developments within 800m of Bus Connects spine route, or 1600m of an existing or planned Luas/Dart/Metro Rail station or within an area covered by a Section 49 scheme, or in lands zoned Major Town Centre.
- Zone 2: Relates to all other areas within the County.

Regard is also had to FDP Objective DMSO119 which seeks to limit the number of car parking spaces at places of work and education so as to minimise car-borne commuting and which states that the number of car parking spaces at new developments shall be in accordance with the standards set out in Table 14.19 and the associated criteria for car-parking provision set out in this Plan.

7.7.3. The proposed development site lies approximately 1.55km to the southwest of Malahide Dart Station, as the crow flies; however, the travel distance between the two locations would exceed the referenced 1.6km (c1.8km) and as such I consider it reasonable to assess the proposed school as being within 'Zone 2'.

7.7.4. The proposed school comprises 16 no. classrooms and 4 no. Special Needs Unit (SNU) rooms, which in accordance with the standards set out in Table 14.19 of the FDP would have a maximum car parking requirement of 24no.spaces in Car Parking zone 1 and a requirement for 32no. spaces within Car Parking Zone 2.

- 7.7.5. The development as proposed would provide a total of 27no. carparking spaces including 3no. universally accessible spaces cited close to school entrance /SNU. The quantum of parking proposed was deemed acceptable by Fingal's Transportation Planning Section. Three of the proposed spaces are to be provided with EV charging points while the remaining spaces are to be fitted with appropriate ducting to allow for future fit out of a charging point. The proposal would in my opinion, accord with the standards set out in Table 14.19 and the associated criteria for car-parking provision set out in this Plan.

Drop-off Facilities

- 7.7.6. In addition to the 27no. car-parking spaces, the development as originally presented to the planning authority, included c.34no. set-down spaces to facilitate the use of private vehicles for school drop off / collection. The Transportation Planning Section in their report to the planning authority (July 2024) considered that the provision of such a large set-down area runs contrary national and local planning policy, which aims to reduce dependency on private car trips to school and facilitate the modal shift to walking, cycling and public transport. They recommended that the 'set-down' area be removed other than necessary to facilitate buses and mobility impaired students. This issue was raised with the applicants at further information stage.
- 7.7.7. In response the applicant provided a revised site layout allowing for a reduction in the quantum of the drop-off spaces from 34 to 12 along with 3 No. Bus/Minibus drop off spaces. In accordance with the information provided in the applicants revised 'Traffic and Transport Assessment' (Nov.2024), 12 is the minimum number of spaces required to ensure the school operates in a satisfactory manner while avoiding disruption in adjacent residential estates.
- 7.7.8. I have considered the plans and particulars submitted with the application and appeal, including the traffic generation and modal shift targets set out in the applicants TTA. In my opinion the provision of 12 no. drop-off spaces as proposed in the revised scheme represents a suitable compromise in addressing the concerns raised by the Transportation Planning Section and those raised by third parties. In my opinion, the parking / drop-off arrangements proposed, together with the location

of the school and its distance from neighbouring residential properties, is sufficient to ensure, that overflow parking, should it occur, would be unlikely to have a significant impact on the local road network or on residential properties in the vicinity.

Bicycle Parking

- 7.7.9. The Bicycle parking standards for Fingal are set out in Table 14.17 of the FDP 2023-2029. The standards are minimum standards and require a 1 no. 'long stay' space and 15 no. 'short stay' spaces for each standard classroom and 1 no. 'long stay' space and 5 no. 'short stay' spaces for each SNU classroom. This equates to a bicycle parking demand of 260 no. 'short stay' spaces and 20 no. 'long stay' spaces. The proposed development provides 280 no. covered bicycle parking spaces in a dedicated area to the north of the site.
- 7.7.10. Third parties are concerned that the quantum of bicycle spaces proposed is excessive given that census data shows only 2.5% of school children cycle and the lack of cycle infrastructure in the area. In response, I note that the quantum of bicycle parking proposed within the scheme accords with the minimum standards set out in the FDP. In my opinion, the availability of bicycle parking on site will help to encourage cycling as a natural travel choice, thereby promoting active travel and supporting the achievement of the model shift targets set out in the TAA and School Travel Plan, in line with national and local policy and guidance. This aspect of the proposed development is therefore acceptable.

7.8. Other Matters

- 7.8.1. It is contended in the grounds of appeal (Zoe and Ronan Palmer) that planning permission was granted before the applicant was required to submit critical further information outlined in the planning authority's directives. The Commission will note that further information was requested by the planning authority on the 9th of August 2024 and that a response was received from the applicants on the 14th and 23rd of May 2025. The applicant's response was assessed by the planning authority in their report of the 19th of June 2025 and deemed to be acceptable. In my opinion, the

information / documentation on file is sufficient to enable the Commission to make a determination on the application.

- 7.8.2. Concerns have been raised in the appeal regarding the impact of the proposed school development, including the intended use of the multi-purpose hall for evening activities, on the residential amenities of neighbouring properties by way of noise, disruption and loss of privacy. As outlined above, the development of this site for a primary school is acceptable in principle. In my opinion use as a school is compatible with residential land use. The school site is set back from existing residential properties and is unlikely to rise to adverse impacts in terms of noise, disruption or loss of privacy. I note that the use of the multi-purpose hall for evening activities would accord with FDP Objective CIO21, which seeks to promote and encourage the multiple usage of school buildings and associated infrastructure so that school facilities are also available for use by the local community after school hours.
- 7.8.3. I am satisfied that no other substantive issues arise I am satisfied that it has been demonstrated in the application that the proposed development site can accommodate a school of the height, scale and design proposed without adverse impact on the visual amenities or character of the area. I am further satisfied that the proposed school building and its attendant grounds would provide for a suitable level of educational accommodation and amenity for students. I note that the planning authority have included in their grant of permission conditions relating to material finish, landscaping and boundary treatment and I would recommend that similar condition be included in the event of a grant of permission.

8.0 AA Screening

- 8.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in the AA screening (see appendix Form 3), I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Site in view of the conservation objectives of those sites

and is therefore excluded from further consideration. Appropriate Assessment is not required.

8.2. This determination is based on:

- The nature and scale of the proposed development and its location on serviced lands
- Distance from and weak indirect connections to European sites

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

9.0 EIA Screening

9.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

10.0 Water Framework Directive (WFD) Screening

- 10.1. The subject site is in the Broomfield area of Malahide in Co. Dublin. The nearest waterbody, the Hazelbrook Stream (Sluice_010) is located c. 480m to the south of the application site.
- 10.2. The proposed development comprises the construction of a new primary school with associated infrastructure, services and ancillary works (see section 2.0 for details). No water deterioration concerns were raised in the planning appeal.
- 10.3. I have assessed the project and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale, design and location of the project, I am satisfied that it

can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater waterbodies either qualitatively or quantitatively.

10.4. The reason for this conclusion is as follows:

- The nature of the development
- The distance from the nearest waterbody
- The design of the surface water drainage system which includes SUDs
- Implementation of standard best practice construction measures

10.5. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

11.0 Recommendation

11.1. I recommend that permission for this development be granted subject to condition as set out below.

12.0 Reasons and Considerations

12.1. Having regard to the provisions of the Fingal Development Plan 2023-2029, and in particular the C1 zoning objective and Local Objective No.52 pertaining to the site and the narrative and policy framework relating educational facilities; and having regard to the nature, scale, design and layout of the proposed development, the location of the site 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 the visual or residential amenities of the area, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application on the 17th of June 2024, as amended by the further plans and particulars received by the planning authority on the 14th and 23rd of May 2025, 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.

Reason: In the interest of clarity.

2. Details of the materials, colours and textures of all the external finishes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity and to ensure an appropriate high standard of development.

3. Building noise insulation shall be provided to an appropriate standard having regard to the location of the site within Dublin Airport Noise Zone C

Reason: In the interest of proper planning and development and to ensure compliance with Objective DMSO105 of the Fingal Development Plan 2023-2029.

4. Prior to the commencement of development detailed final details and layout of all works proposed for the area surrounding the entrance to the proposed development, including all road surfaces, ramps, road markings, signage and bollards, designed to align with the NTA's 'Safe Routes to School Design Guide' shall be submitted to and agreed in writing with the Planning Authority

Reason: in the interests of traffic safety and proper planning and development

5. The development shall be carried out and operated in accordance with the provisions of the School Travel Plan submitted to the planning authority on 17th June 2024. The specific initiatives outlined in section 4 of the plan shall be implemented in full upon first occupation of the development. The developer shall undertake an annual monitoring exercise to the satisfaction of the planning authority for the first 9 years following first occupation and shall submit the results to the planning authority for consideration and placement on the public file.

Reason: To achieve a reasonable modal split in transport and travel patterns in the interest of sustainable development.

6. Road safety Audits, for the proposed access road prepared in accordance with current Transport Infrastructure Ireland guidelines, shall be submitted to and for the written agreement of the Planning Authority. Where the audit identifies the need for design changes revised design details should be submitted to and agreed in writing with the Planning Authority. The developer shall carry out all necessary works in accordance with the agreed revised design.

Reason: In the interest of traffic safety and proper planning and sustainable development

7. Prior to the commencement of development, the developer shall enter into a Connection Agreements with Uisce Éireann (Irish Water) to provide for service connections to the public water supply and wastewater collection network.

Reason: In the interest of public health and to ensure adequate water/wastewater facilities.

8. The attenuation and disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to

the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.

Reason: In the interest of public health.

9. Public lighting shall be provided in accordance with a scheme which shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of amenity and public safety.

10. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development.

Reason: In the interests of visual amenity

11. Construction times Site development and building works shall be carried out between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 on Saturdays and not at all on Sundays and public holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written agreement has been received from the planning authority.

Reason: To safeguard the amenity of property in the vicinity.

12. Prior to commencement of works, the developer shall submit to, and agree in writing with the planning authority, a Construction Management Plan, which shall be adhered to during construction. This plan shall provide details of intended construction practice for the development, including hours of working, management of construction traffic, noise and dust management measures and off-site disposal of construction/demolition waste.

Reason: In the interest of public safety and amenity.

13. The developer shall comply in full with the following:

- a. All necessary measures shall be taken by the applicant/developer to prevent the spillage or deposit of any materials including clay rubble or other debris on public roads during the course of development. In the event of any such spillage or deposit, immediate steps shall be taken to remove the material from the road surface at the applicant/developers own expense.
- b. The applicant/developer shall be responsible for the full cost of repair in respect of any damage caused to public roads arising from the construction work and shall either make good any damage to the satisfaction of Fingal County Council or pay the Council the cost of making good any such damage upon issue of such a requirement by the Council.

Reason: To protect the amenities of the area.

14. All areas that are proposed to be taken in charge by the Council shall be carried out and completed at least to the construction standards as set out in the Council's Taking in Charge Standards.

Reason: To ensure that the development is carried out and completed to an acceptable standard of construction.

15. 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.

Reason: In the interest of proper planning and sustainable development.

16. The developer shall comply with the following requirements of the Planning Authority;

- a. Prior to the commencement of works on site, a revised landscape plan shall be submitted and agreed in writing with the Parks and Green Infrastructure Division to include the following:
 - i. Boundary treatment proposals along the entrance road as well as contours.
 - ii. The proposed grass margin with street tree planting along the northern side of the cycleway on the entrance road shall be level to allow safe access and use of grass maintenance machinery.
 - iii. Proposed lamp standards, mini pillars and signage located in grass margins shall be located on a concrete surround (300mm) and not directly in the grassed area.
 - iv. The grass margins shall be maintained on a minimum of a three-week maintenance rota.
- b. Prior to the commencement of works on site, a site meeting shall be arranged between the Parks and Green Infrastructure Division and the appointed arboricultural consultant to agree tree protection measures and tree works to the trees and hedgerows shown for retention.

Reason: In the interests of landscaping and tree protection.

17. The following shall be complied with in full:

- i. All ground reduction should be subject to a programme of archaeological monitoring, under licence, by a suitably qualified archaeologist. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.
- ii. Where archaeological material is shown to be present, avoidance, preservation in situ, or preservation by record (excavation) may be required. Works may be halted pending receipt of advice from the National Monuments Service, Department of Housing, Local Government and Heritage who will advise the Applicant/Developer with regard to these matters.
- iii. On completion of monitoring of groundworks, and any excavations arising, the archaeologist shall submit written reports, placing the results in the context with the surrounding archaeological investigations, to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.

Reason: In the interests of archaeological heritage.

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.

Lucy Roche
Planning Inspector

1st October 2025

Form 1 - EIA Pre-Screening

Case Reference	ACP-322888-23
Proposed Development Summary	Construction of a new primary School on 1.8ha site
Development Address	Broomfield, Malahide, Co. Dublin
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2. ☐ No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☐ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	The proposed development comprising a school on a 1.8ha site falls under Class 10. Infrastructure projects, in particular: (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Form 2 - EIA Preliminary Examination

Case Reference	ACP-322888-23
Proposed Development Summary	Construction of a new primary School on 1.8ha site
Development Address	Broomfield, Malahide, Co. Dublin
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. The proposed scheme comprises a new primary school on a greenfield site with a stated area of 1.8ha. The development, comes forward as a standalone project, does not require the use of substantial natural resources or give rise to significant risk of pollution or nuisance. The project uses standard construction methods materials and equipment, and the process is to be managed through the implementation of a CEMP. The development by virtue of its type does not pose a risk of major accident and / or disaster or is vulnerable to climate change. It presents no risks to human health
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	Briefly comment on the location of the development, having regard to the criteria listed The site is a greenfield site, adjacent to the established built-up area. The site is not located within or immediately adjacent to any designated site. the site is indirectly linked to designated sites via surface and foul water drainage. Potential impacts on designated European site can be addressed under Appropriate Assessment.

	Compliance with Article 4(7) of the Water Framework Directive will also be considered as part of the application. The proposed development would use the public water and wastewater services of Uisce Eireann, upon which its effects would be marginal. The site is not of any historic, cultural or archaeological significance.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects. Having regard to the nature of the proposed development, its location removed from sensitive habitats / features, likely limited magnitude and spatial extent of effects and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act
Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ **Date:** _____

DP/ADP: _____ **Date:** _____

(only where Schedule 7A information or EIAR required)

Form 3 – Screening for Appropriate Assessment

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	Normal Planning appeal Primary school with associated infrastructure and ancillary works, Malahide, Dublin See section 2.0 of Inspectors Report
Brief description of development site characteristics and potential impact mechanisms	GFA c.3,610 sq. m Greenfield site of 1.8ha. Connection to public mains water and foul drainage. Surface water will be drained by gravity and discharged to the existing drainage ditch northwest of the site at the entrance road. This ditch drains south to the Hazelbrook Stream, a tributary of the Sluice River, which in turn outfalls to the Irish Sea at Baldoyle Bay. There are no other watercourses or other ecological features of note on the site that would connect it directly to European Sites in the wider area.
Screening report	No (see note below) FCC Screened out the need for AA
Natura Impact Statement	No
Relevant submissions	None
Note: I note that the documentation submitted with the application and appeal, and the report of the Local Authority case Planner refers to a report for the purposes of Appropriate Assessment Screening prepared by Moore Group – Environmental Services. This document does not form part of the application documentation submitted to ACP. It has been confirmed by Fingal County Council (FCC) in an e-mail dated 1st August 2025, that this document was not submitted by the applicant and was never received by FCC.	
Step 2. Identification of relevant European sites using the Source-pathway-receptor model	
The site is not within or directly adjacent to any European Site nor has any direct hydrological link between the application site and designated site been identified. A drainage ditch extends	

along the northern boundary of the site. This ditch was dry on the date of inspection. A wet ditch exists approximately 177m to the south of the site, OSI mapping shows this watercourse terminating just east of the railway line. The Hazelbrook Stream lies further to the south (c. 480m). This stream drains to the Sluice River, which in turn discharges to Baldoyle Bay.

The closest European Sites are located approx. 1.6km to the north and are associated with the Malahide Estuary, these are the Malahide Estuary SPA and SAC. The Baldoyle Bay SAC and SPA are located c. 2.3km to the south the site would be indirectly linked to these sites via surface water drainage.

The site would be indirectly connected by way of the foul water drainage network and the Ringsend Wastewater Treatment Plant (Ringsend WWTP) to the following Natura 2000 sites: South Dublin Bay SAC (Site Code: 000210), South Dublin and River Tolka Estuary SPA (Site Code: 004024), North Dublin Bay SAC (Site Code: 000206) and North Bull Island SPA (Site Code: 004006).

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further screening ³ in Y/N
Malahide Estuary SPA (004025)	15 Qualifying Interests Malahide Estuary SPA National Parks & Wildlife Service	c. 1.6km	No	No
Baldoyle Bay SPA (004016)	7 Qualifying Interests Baldoyle Bay SPA National Parks & Wildlife Service	c.2.3km	Weak indirect link via surface water drainage	Yes
North Bull Island SPA (004006),	18 Qualifying Interests North Bull Island SPA National Parks & Wildlife Service	c. 5.6km	Indirect	Yes
North-West Irish Sea SPA (site Code:4236),	21 Qualifying Interests North-west Irish Sea SPA National Parks & Wildlife Service	C 2.3km	No	No
South Dublin Bay and River Tolka Estuary SPA (004024),	14 Qualifying Interests South Dublin Bay and River Tolka Estuary SPA National Parks & Wildlife Service	C 8.6km	Indirect	Yes

Malahide Estuary SAC (000205)	6 Qualifying Interests Malahide Estuary SAC National Parks & Wildlife Service	c. 1.6km	No	No
Baldoyle Bay SAC (000199)	4 Qualifying Interests Baldoyle Bay SAC National Parks & Wildlife Service	c. 2.3km	Weak indirect link via surface water drainage	Yes
South Dublin Bay SAC (Site Code: 000210)	4 Qualifying Interests South Dublin Bay SAC National Parks & Wildlife Service	C 10.8km	Indirect	Yes
North Dublin Bay SAC (000206)	10 Qualifying Interests North Dublin Bay SAC National Parks & Wildlife Service	c. 5.6km	Indirect	Yes

¹ Summary description / **cross reference to NPWS website** is acceptable at this stage in the report

² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

³if no connections: N

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: North Bull Island SPA (004006), QI list • Light-bellied Brent Goose (Branta bernicla hrota) [A046] • Shelduck (Tadorna tadorna) [A048] • Teal (Anas crecca) [A052] • Pintail (Anas acuta) [A054] • Oystercatcher (Haematopus ostralegus) [A130]	Direct: None Indirect: Hydraulic/organic overloading of Ringsend WwTP leading to the release of untreated sewage into Dublin Bay and associated European sites.	The proposed development will contribute to loading in the Ringsend WWTP. Additional loading to this plant arising from the operation of the project is not significant particularly given the nature of the development as a school serving the local area. Furthermore, there is no evidence that pollution through nutrient input is affecting the

• Golden Plover (Pluvialis apricaria) [A140] • Grey Plover (Pluvialis squatarola) [A141] • Knot (Calidris canutus) [A143] • Sanderling (Calidris alba) [A144] • Dunlin (Calidris alpina) [A149] • Black-tailed Godwit (Limosa limosa) [A156] • Bar-tailed Godwit (Limosa lapponica) [A157] • Curlew (Numenius arquata) [A160] • Redshank (Tringa totanus) [A162] • Turnstone (Arenaria interpres) [A169] • Black-headed Gull (Chroicocephalus ridibundus) [A179] • Shoveler (Spatula clypeata) [A857] • Wetland and Waterbirds [A999]		conservation objectives of any of the Natura 2000 sites in Dublin Bay. No significant effects are likely to arise to Natura 2000 sites from this source. Potential impacts from this effect mechanism can therefore be ruled out.
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		
	Impacts	Effects
Site 2: South Dublin Bay and River Tolka Estuary SPA (004024), QI list: • Light-bellied Brent Goose (Branta bernicla hrota) [A046] • Oystercatcher (Haematopus ostralegus) [A130] • Ringed Plover (Charadrius hiaticula) [A137]	As Above	As Above

• Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Knot (<i>Calidris canutus</i>) [A143] • Sanderling (<i>Calidris alba</i>) [A144] • Dunlin (<i>Calidris alpina</i>) [A149] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Redshank (<i>Tringa totanus</i>) [A162] • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Roseate Tern (<i>Sterna dougallii</i>) [A192] • Common Tern (<i>Sterna hirundo</i>) [A193] • Arctic Tern (<i>Sterna paradisaea</i>) [A194] • Wetland and Waterbirds [A999]		
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		
	Impacts	Effects
Site 3 South Dublin Bay SAC (Site Code: 000210) QI List: • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Embryonic shifting dunes [2110]	As above	As above
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		

	Impacts	Effects
Site 4 North Dublin Bay SAC (000206) QI List. • Mudflats and sandflats not covered by seawater at low tide [1140] • Annual vegetation of drift lines [1210] • Salicornia and other annuals colonising mud and sand [1310] • Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330] • Mediterranean salt meadows (Juncetalia maritimi) [1410] • Embryonic shifting dunes [2110] • Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] • Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] • Humid dune slacks [2190] • Petalophyllum ralfsii (Petalwort) [1395]	As Above	As Above
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		
	Impacts	Effects
Site 5 Baldoye Bay SPA (004016) QI List. • Light-bellied Brent Goose (Branta	Operation Phase: surface water will be attenuated by integrated SUDs system	Low risk of surface water borne pollutants reaching Baldoye Bay and associated designated sites.

• bernicla hrota) [A046] • Shelduck (Tadorna tadorna) [A048] • Ringed Plover (Charadrius hiaticula) [A137] • Golden Plover (Pluvialis apricaria) [A140] • Grey Plover (Pluvialis squatarola) [A141] • Bar-tailed Godwit (Limosa lapponica) [A157] • Wetland and Waterbirds [A999] •		
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		
	Impacts	Effects
Site 6 Baldoye Bay SAC (000199) QI List. • Mudflats and sandflats not covered by seawater at low tide [1140] • Salicornia and other annuals colonising mud and sand [1310] • Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] • Mediterranean salt meadows (Juncetalia maritimi) [1410]	As Above:	As Above
Likelihood of significant effects from proposed development (alone): No		
If No, is there a likelihood of significant effects occurring in combination with other plans or projects? No		
Step 4 Conclude if the proposed development could result in likely significant effects on a European site		

I conclude that the proposed development (alone or in combination with other plans and projects) would not result in likely significant effects on European sites. No further assessment is required for the project.
No mitigation measures are required to come to these conclusions.