An Roinn Oideachais Department of Education



19 May 2022

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

Re: Case Reference No. 313322: SHD at Priorsland in Cherrwood SDZ www.priorslandshd.ie

Dear Sir/Madam,

I refer to the SHD application 313322 that was submitted by Carrickmines Land Ltd in respect of lands at Priorsland in Cherrywood SDZ. This application is a proposed development that, if permitted, will allow for the development of 443 residential units (41 houses and 402 apartments).

In response to An Bord Pleanála's invitation to make a submission under the provisions of article 302 (6)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the Department of Education would like to make an observation in respect of the proposed school site which directly adjoins the proposed development

The applicant/developer has engaged with the Department of Education through their design team and technical advisors regarding meeting future education requirements arising. A site is reserved on these lands to cater for a likely future primary school and this is included as part of the SDZ plan. It is acknowledged that it is difficult to determine and project now the precise education requirements that will materialize. They will be dependent on a balance of demographic outcomes associated with the development, its implementation as well as other development in the surrounding area.

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

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



1. The identified school site area is 0.8 Hectares/1.97 acres. This is substantially below the traditional school site area which contains sufficient independent external amenities and facilities. However, there is an acknowledgement that due to the scarcity of land in urban areas such as this, it is not always possible to achieve the ideal site size for school buildings. Where some of the elements required for a school site can be provided outside the designated site area (e.g. traffic management, parking, playing fields, etc.), where it is possible to provide multi-storey (above two storey) buildings, and where separation areas can be reduced due to the nature of permitted development on and adjacent to the site; then smaller sites can be considered (as in this case). The school building intended to be provided here will cater for a likely 600 pupils. Consequently, there is a need for an appropriate level of external facilities and amenities.

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

- (i) The Department will not have any capacity to modify the transport infrastructure as part of a future planning application. The Board is therefore asked to determine and confirm that the transport infrastructure proposed under the current SHD application and its Mobility Management Plan and Traffic and Transport Assessment (TTA) is deemed to incorporate all future projected traffic and transport needs for a school of 600 pupils (24 classrooms) plus a Special Needs unit. The TTA needs to take account of disability transport to serve the school.
- (ii) There is insufficient land for play and recreational amenities to meet the school's need on the school site. However, the SDZ planning scheme provides adjoining open green space. For a school to operate successfully on the school site, it is necessary that the use of the adjacent green space is confirmed and embedded through a protected and transferable covenant (or other appropriate type agreement) confirming access rights and exclusive school use during school-term and for the operational hours of the school day.



The Department respectfully requests that the Board considers these points in the interest of facilitating the operation of a future school to meet local educational requirements.
Kind regards
Yours sincerely
Mary Carney

Forward Planning Section