29 June 2021

Planning Dept

Meath County Council

Buvinda House

Dublin Road

Navan

Co. Meath

**Re: Material amendments to draft Meath County Development Plan 2021-2027**

To whom it may concern

The Department of Education (DoE) has reviewed the proposed material amendments to the draft Meath County Development Plan and in particular the Department acknowledges the additional emphasis and focus on compact sustainable growth as set out in the National planning Framework (NPF) and as recognized by the Department of Transport and Office of the Planning Regulator submissions.

The Department of Education welcomes a number of amendments made to the draft plan on foot of its submission to the draft plan and requests the inclusion of the following amendments in order to better contribute to the timely delivery of required educational infrastructure for communities in County Meath.

The inclusion of an additional 800 people in the 2027 population of Navan is noted. This further increase adds to the importance of the already identified need for close engagement between the Department and the local authority in the context of the Navan Local Area plan process.

The proposed approach in the Core Strategy to intensification and consolidation of development in established urban areas, and the emerging urban design consideration such as increased density, plot ratio and increased building height increases the challenges for the Department to provide timely educational infrastructure. Therefore the Department wishes to make the following observations in regard to Ashbourne and Dunboyne in order to aid delivery of educational requirements in both of these settlements:

Ashbourne

The Department had requested that the wording of objective ASHOBJ19 be amended to specifically support the provision of Ashbourne Community National School on the Minister’s campus site at Killegland, and to support the potential future provision of post-primary accommodation on the site, should such a requirement emerge. It is noted that this is not included in the material alterations; that the CEO report proposes that educational provision be explored as part of the LAP process. Given the primacy of the County Development Plan and the likely requirements in Ashbourne, the Department still requests that objective ASHOBJ 19 be amended as requested, in order to give greater certainty in regard to delivery of future educational requirements in Ashbourne.

Dunboyne

It is intended to deliver a new educational campus in Dunboyne on the Community Infrastructure zoned lands proximate the rail station at Dunboyne North (GUID727 on the online interactive MCC Material Amendments Land use zoning map for Dunboyne). This campus is to cater for 3 educational establishments (a primary school, a post-primary school and a further education facility). At present, 5 hectares are zoned to cater for the campus but this is insufficient in order to provide adequate recreation facilities for the campus students. Therefore, the Department considers it important that the County Development Plan acknowledges this reality as it will aid delivery of the facilities required for the community and will be an embedded principle at local area plan stage. Therefore, we re-iterate our request that the extent of the zoned lands are expanded by 1.1 hectares in the County Development Plan or alternatively that playing pitches be provided in the adjoining open space lands.

Chapter 10: Climate Change Strategy

Green Roofs INF OBJ 27 (and any related objectives):

“To encourage the use of Green Roof Technology particularly on apartment, commercial, leisure and educational buildings.”

Experience of green roof technology on school research projects has demonstrated that silting occurs in the water recycling systems at an accelerated rate where this technology has been used with green roofs creating operating complications and costs for schools, and premature decline of the water conservation system, ultimately negating the intended conservation outcome.

The Department requests that the Planning Authority recognizes the benefits of its water recycling strategy as it relates to SuDS. The Department has no objection to the any biodiversity benefits being transferred to a landscaping objective, but not on the roof.

The Department had previously requested the removal of green roof technology from educational facilities in its March 2020 submission under Chapter 6 Infrastructure Strategy. The Department of Education again explicitly requests that “educational buildings” be removed from this objective due to the fact that it has been shown to clash with sector specific standards are established and meeting climate change mitigation and adaptation targets and conservation measures developed by the Departments Planning and Building Unit (PBU), e.g., rainwater harvesting and grey-water recycling.

Chapter 11 Development Management Standards

11.5.7 Separation Distances: The Department acknowledges the intended application of the minimum separation distances requirements for privacy as it relates to residential developments. However as schools are now to be developed in more urban scenarios and in closer proximity to mixed use (including residential) buildings there is an increasing experience of delays to the planning development process due to increasing Third Party observations and objections nationally.

Therefore the Department requests that schools in an urban context are specifically exempt from this requirement and that in the case of residential developments and/or mixed use developments incorporating residential in an urban context that the internal detailed planning of those residential units shall consider the overlooking risks from other buildings including schools.

Section 7 – Community Development Standards:

7.3 Education

The Department welcomes the general provisions under this section regarding reference to its design guidelines and technical guidance documents, and “the Provision of Schools and the Planning System: a Code of Practice for planning Authorities: 2008”.

DM OBJ 71: regarding the assessment of planning applications for new schools and/or redevelopment /extensions of existing schools, the Department is concerned over the statement having regard to “Impact on local amenities and out of hour’s uses”. The Department sees the development/redevelopment of schools in the community as a benefit rather than a negative impact and the Planning Authority is requested to include a favorable language in this regard.

DM OBJ 73; Dual function of sports facilities/halls etc. outside of school hours will be encouraged where the use of such facilities will be of a benefit to the wider community”. This aligns with Department of Education policy where this can be provided and operated in a practical way. Similarly where new schools are provided in urban areas and reduced land is available the Department requests that the Planning Authority include similar DO objectives whereby schools can use existing amenities.

DM OBJ 74: The Department acknowledges the benefits and requirements a mobility Management Plan for new schools and extensions to existing schools. However in the assessment of such planning applications, and particularly given the consolidation and intensification of use in existing settlements centrally located schools (new and existing) will require relaxations and or supports to make them viable. The Planning Authority is requested to include particular objectives in the transport and community facilities, and open space sections of the draft DP.

Section 9 – Parking Standards: 11.9.1 Parking Standards

DM OBJ 89: Car parking shall be provided in accordance with Table 11.2 and associated guidance notes.

Table 11.2 Car Parking (Extract)

|  |  |
| --- | --- |
| Land Use | Car Spaces |
| Health and Education Facilities |  |
| Schools | 3 per classroom plus dedicated pick up/set down area within the site boundary |
| Department of Education Proposed Revised Standard | Static car spaces shall be determined by the Department of Education based on maximum staffing numbers and a reasonable allowance for visitors. This shall be supplements in development control through the application of a mobility Management Plan to determine additional necessary set down spaces for buses and cars. |

The Department considers the current proposed number of car spaces to be very excessive and disproportionate and contrary compact development, sustainable transport and modal share. In addition this current excessive standard introduces i=uncertainty to the identification and acquisition of sites for schools. The Department requests that the standard for schools be revised in accordance with the Departments own schedules of accommodation being equivalent to 1 space per member of staff plus an allowance for visitors. This includes spaces for disabled driver also.

The requirement of DM OBJ 74 Mobility Management Plan will allow for adequate and additional bus, car circulation and set down on a case by case basis. See above Departments requested standard

The Department thanks Meath County Council for ongoing assistance in relation to school planning matters and looks forward to continuing to work together to deliver educational requirements for Co. Meath.

Yours sincerely

Alan Hanlon

Statutory Plans