



An  
Bord  
Pleanála

## Inspector's Report

### ABP-321696-25

#### Development

New primary school (Roll No. 20549P), including 20 classrooms, with a gross floor area of 3,449 sq.m over 3 storey's

#### Location

Lands south of Coolamber Drive, Rathcoole, Co. Dublin.

#### Planning Authority

South Dublin County Council

#### Planning Authority Reg. Ref.

SD23A/0336

#### Applicant(s)

Department of Education

#### Type of Application

Permission

#### Planning Authority Decision

Grant permission

#### Type of Appeal

Third Party

#### Appellant(s)

1. Beechwood Lawns, Coolamber, Maple Residents Association
2. Four Districts Woodlands Habitat Group

#### Observer(s)

1. Annie Flynn
2. Susan Healy

3. Ronan Mac Diarmada

**Date of Site Inspection**

2<sup>nd</sup> May 2005

**Inspector**

Emer Doyle

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## **1.0 Site Location and Description**

- 1.1. The site is located to the south of existing residential housing currently fronting Coolamber Drive in Rathcoole, Dublin.
- 1.2. The site size is stated to be c. 1.8 hectares. The site is located on lands currently characterised as unmanaged grasslands, adjacent to Rathcoole Alluvial Woodlands to the west and south and Rathcoole Park to the east.
- 1.3. The site is relatively flat and irregular in shape. The site boundaries include hedgerow and woodland trees, with walls to the rear of residential properties.

## **2.0 Proposed Development**

- 2.1. Permission is sought for the following:
  - Primary school comprising overall total of 20 No. Classrooms including 4 No. special education classrooms - 1/2/3 storey building of 3,449m<sup>2</sup>
  - Multi-purpose hall
  - Ancillary teacher and pupil facilities
  - The development includes car and bicycle parking, stores, hard and soft play areas including 2 ballcourts, signage and flagpoles.
- 2.2. Temporary access is proposed via the Coolamber Drive Housing Development with provision for future access from a proposed link road via Mullany's Lane.
- 2.3. The application is accompanied by the following:
  - Engineering Assessment Report
  - Flood Risk Assessment
  - School Travel Plan
  - Regulatory Compliance Report
  - Outline Construction and Waste Management Plan
  - Traffic and Transport Assessment
  - SUDS Management Plan

- Arboricultural Report
- Architectural Report
- Planning Report
- Cultural Heritage Impact Assessment
- Acoustic Design Statement
- Invasive Species Survey
- Report for the purposes of Appropriate Assessment Screening
- Photomontages
- Ecological Impact Assessment
- Mechanical and Electrical Services details
- Outdoor Lighting Report

2.4. A Further Information Request was issued by the Planning Authority dated the 22<sup>nd</sup> of February 2024. The applicant was granted an extension of time to respond to the Further Information Request by the Planning Authority in accordance with Article 33(3) of the Planning and Development Regulations 2001 (as amended).

2.5. This has been re-advertised as 'Significant Further Information'.

Revised details were submitted to the Planning Authority dated the 20<sup>th</sup> of November 2024 which included the following:

- Alterations to red line site boundary to reflect neighbouring property ownership at No. 71 Coolamber Drive.
- Alterations to site layout to remove all proposed development from lands zoned as 'RU'.
- The alterations include relocation of car parking and drop off areas, additional bicycle parking, alterations to road layout and bus drop off, access arrangements for lands to the site, relocation of the school closer to the road and dwellings in Coolamber Drive and relocation of ball courts and play area.
- Proposals for permanent closure of the vehicular access from Coolamber Drive and for the use of this temporary access as pedestrian and cycle access

only, once the future connection to Mullaly's Lane is delivered. Drawing P115 indicates that bollards will be used to close the road to vehicular traffic.

- Revised landscaping drawings.
- Minor alterations to school elevation.

2.6. A number of additional reports have been submitted as follows:

- Architectural Responses Report
- Hydrological Assessment- revised SuDS proposals.
- Engineer's Report in response to engineering related elements of the Further Information Request- i.e. Item No. 3 b and c, item 4, item No. 6 a and b, Item No. 10, item Nos. 11, 12 and 13.
- Revised Traffic Impact Assessment - In response to item 10 new counting and data collection for the school area was carried out in April 2024 and an additional junction was included (Junction 4).
- Quality Audit including Stage 1 Road Safety Audit
- Ecological Impact Assessment incorporating revised SuDS proposals.
- Response to items 7 and 8 including landscape plan, planting plan and schedule, green infrastructure plan, green infrastructure Integration Plan and Landscape Design Statement.
- Letter prepared by Moore Archaeology in relation to a delay in response to the archaeology requirements of the Further Information Request.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

3.1.1. Permission granted subject to 19 No. conditions. Conditions of note are summarised as follows:

Condition No. 2 (a) The temporary vehicular access shall be via Coolamber Drive. However when the alternative access is delivered via Mullaly's Lane, Coolamber

Drive will become a pedestrian and cycle access only to the proposed school and the Coolamber Drive access shall be boarded up within 6 No. months.

(b) The applicant shall erect a gate on the boundary fence at the location of the future vehicular access adjacent to Mullaly's Lane. The gate shall be located on the North-west boundary of the proposed development.

(c) Prior to commencement of development, the applicant shall revise specific parts of the Traffic and Transport Assessment to include the following:

(i) Review of the background traffic on Beechwood Lawns/ Fitzmaurice Road junction at peak times. (ii) figures of RFC, DOS and queue lengths at the Beechwood Lawns/ Fitzmaurice Road junction at peak times. (iii) Review the trip generations, particularly by car, to and from the proposed development at peak times.

(e) Prior to occupation, a revised Mobility Management Plan shall be submitted by the applicant and agreed to the satisfaction of the planning department. This may include an examination of options for walking-bus initiatives from existing carparks or any off-campus breakfast clubs within a reasonable walking distance from the school hereby permitted.

Condition No. 3 - Archaeological testing and geophysical testing prior to commencement of development including any site preparation works.

Condition No. 4 - Prior to commencement of development, the applicant shall submit a statement detailing the measures to be taken to make the school facilities available outside of the school hours.

Condition No. 5 - All mitigation measures recommended within the Ecological Impact Assessment and Acoustic Design Statement shall be implemented in full.

Condition No. 10 - (a) No wildflower seeds of non-local origin permitted.

(b) Protection of riparian strip during construction phase.

(c) Management of riparian strip and proposed meadow areas by appropriate mowing to encourage locally occurring wildflowers.

Condition No. 17 sets out requirements in relation to construction including dust suppression measures, proposals for vehicular cleansing, storage of construction

materials within the site only and the location of on site parking for construction staff to be agreed with the Planning Authority prior to commencement of development.

Condition No.19 required that no floodlighting of any kind shall be erected on the site without the benefit of planning permission.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

- The planner's report dated 14<sup>th</sup> of February 2024 considered that while the delivery of a school is a site specific objective of the Core Strategy of the Development Plan, the protection of the Alluvial Rathcoole Woodlands is a critical consideration in the assessment of any such proposal. Further Information was required in relation to a wide range of issues.
- The second planner's report considered that the responses to the Further Information request were generally acceptable and recommended permission subject to conditions. It was noted that the Department of Environment, Heritage and Local Government had requested Clarification of Further Information, however this was not feasible having regard to timeframes under the Planning and Development Regulations and it was considered that this matter could be conditioned.

#### **3.2.2. Other Technical Reports**

- The report from Roads Design dated 24<sup>th</sup> of January 2024 recommends Further Information. The main issues raised focused on traffic management, car and bicycle parking and a road safety audit.
- The second report from Roads Design dated the 21<sup>st</sup> of November 2024 considered that generally the revised details submitted were satisfactory. Concerns were expressed in relation to the response to item 10 in relation to the Beechwood Lawn and Fitzmaurice Road junction. It was also considered that the traffic movements identified of 80 No. movements at peak times was underestimated. The Roads Department considered that there would be approximately 145 No. traffic movements to and from the school at peak



times. It was considered that this matter could be addressed by way of a condition. The report recommended permission subject to conditions.

- **Environmental Health Department:** No objection subject to conditions. A second report noted the significant further information and had no further comments.
- **Water Services:** The first report from Water Services dated the 6<sup>th</sup> of February 2024 required Further Information. The second report dated the 29<sup>th</sup> of November 2024 recommended permission subject to conditions.
- **Public Realm:** The first report dated the 29<sup>th</sup> of January 2024 required Further Information in relation to landscaping and SuDS. A second report recommended permission subject to conditions.
- **Delivery Team:** The provision of a school is supported by the preferred option for these lands. Further Information required. A second report considered that the revised information submitted was satisfactory.

### 3.3. Prescribed Bodies

**Irish Water:** No objection subject to conditions.

**Department of Housing, Local Government and Heritage:** Requires Further Information in relation to archaeology. A second report required clarification in relation to this matter.

**Inland Fisheries:** Concern regarding impacts on Camac River as in August 2023, there was a major incident in the Saggart area which impacted over 4km of the Camac with a total loss of all aquatic species. There is connectivity to the Camac via the existing drainage network in the area and particular attention is necessary in the construction stage and post construction should the agreed SuDS drainage system not be maintained. Recommended that there is an experienced, informed person appointed to ensure that measures to protect the aquatic environment during the construction phase and that no development takes place till silt fencing is in place.

**Department of Housing and Local Government and Heritage:** The Department has reviewed the Information initially submitted with the application and the Further Information submitted in relation to heritage. In relation to the concerns expressed

regarding adverse impacts on the hydrological conditions supporting the priority and annex 1 habitats present in the woodland areas, the Department considers that the modified design of the surface water drainage system omitting the underground attenuation tanks would not have long term impacts on the adjacent woodland areas and the annexed habitats present in them by altering their hydrology.

It is recommended that the proposed use of commercially supplied native wildflower seeds in the 15m wide riparian strip is not carried out as the introduction of such seeds would represent a threat to the rich biodiversity on the site.

In relation to archaeology, a geophysical survey was carried out but no report has been submitted to the Department to date. As such, the Department recommends Clarification of Further Information.

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

- 3.4.1. Objections to the proposal received by the planning authority are on file for the Board's information. The main issues raised are similar to those in the 3<sup>rd</sup> party appeals and observations submitted on the appeal.
- 3.4.2. There are also a number of letters in support of the proposed development stating that this is a much needed school for the area.

## **4.0 Planning History**

### **4.1.1. PA Reg. Ref. S.A. 2018/An Bord Pleanála Ref. PL 6/5/49015**

Permission refused by Dublin City Council and by An Bord Pleanála on appeal for 12 classroom primary school at this location for one reason relating to traffic hazard.

## **5.0 Policy Context**

### **5.1. Relevant National Guidelines include the following:**

- National Planning Framework- First Revision April 2025 – Please note that the revised NPF includes significantly higher population estimates for the Dublin area.
- Climate Action Plan 2025

- National Biodiversity Action Plan 2023-2030
- National Transport Authority- Safe Routes to School Design Guide
- The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities, (2008)

## **5.2. Development Plan**

### **5.2.1. South Dublin County Council Development Plan 2022-2028**

The site is subject to three zoning objectives as follows:

Majority of site: RES-N: To provide for new residential communities in accordance with approved area plans.

Northern South Western portion: RU: To protect and improve rural amenity and to provide for the development of agriculture.

Eastern portion: OS: To preserve and provide for open space and recreational amenities.

The site has a site specific ‘ Proposed School’ Objective, per Development Plan Map 8.

There are a significant number of plan policies referenced in the report of the Planning Officer. The following are specifically noted:

Chapter 2 Core Strategy and Settlement Strategy

Policy CS10: Rathcoole

Support the sustainable long-term growth of Rathcoole by focusing development growth along the main street based on local demand and the ability of local services to cater for sustainable growth.

CS10 Objective 1: To facilitate the commencement and completion of development on zoned residential lands within and contiguous to the settlement boundary of Rathcoole which recognises natural heritage assets and facilitates connections to the village core and other areas to provide for active travel opportunities.

CS10 Objective 3: To proactively support and promote the highest levels of services, social infrastructure, facilities, retail, and economic activity to meet the needs of

current and future growth in line with the scale and function of Rathcoole within the settlement hierarchy.

CS10 SL01: To ensure the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development having regard to the provisions of G17 SL02.

Chapter 7 relates to sustainable movements

Policy SM1: Overarching- Transport and Movement

Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high quality sustainable transport and movement network for people and goods.

SM2 Objective 7: 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 that multiple access points are provided to school sites for pedestrians and cyclists;
- Ensuring that adequate and secure bicycle storage is provided within schools;
- Promoting initiatives such as Green Schools and Schools Streets projects;
- Prioritising school routes for permeability projects 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.

Chapter 8 relates to community infrastructure and open space.

Policy COS8: Primary and Post Primary Schools

COS8 Objective 2: To facilitate the development of new schools, ensuring that new school sites are retained for educational use, and the re-development of existing schools and extensions planned as part of the Government's School Building Programme.

C058 Objective 6: To ensure new schools are designed and located to promote walking and cycling and access to public transport, by implementing the following measures:

- Ensuring school sites are in locations that are central and accessible to the communities they serve;
- Providing infrastructure including safe cycle ways and footpaths;
- Requiring a mobility management plan for all new schools that prioritises active travel and public transport;
- Incorporating measures to promote walking and cycling at design stage including permeability and connectivity with the surrounding area through provision of adequate access points for pedestrian and cyclists;
- Ensuring the provision of adequate secure bicycle storage;
- Working with existing and new schools to increase the proportion of students walking and cycling through the promotion of initiatives such as 'Green Schools' and 'School Streets' projects.
- Introducing measures that would support increased bus services to enable more students to travel to school through public transport.

Section 12.8.5 sets out the issues that planning applications for schools are expected to address.

### **5.3. Natural Heritage Designations**

- 5.3.1. Table 2 of the Ecology Impact Assessment outlines a list of all Special Areas of Conservation and Special Protection Areas within 15km of the site. The closest such site is Glenasmole Valley SAC c. 6.3km from the site. Table 3 outlines a list of all proposed Natural Heritage Areas within 15km of the site. The closest such site is Slade of Saggart and Crooksling Glen c. 1.8km from the site.
- 5.3.2. Rathcoole Alluvial Woodlands adjacent to the site is not a European Site or a pNHA site. I will deal with this site and the concerns raised in relation to the impacts on same separately in the ecology section of this report.

## **5.4. EIA Screening**

- 5.4.1. See completed forms 1 and 2 in Appendix 1 of this report.
- 5.4.2. Having regard to the nature and scale of the proposed development in a serviced urban area I have concluded at preliminary examination stage that there is no real likelihood of significant effects on the environment arising from the proposed development having regard to the criteria set out in Schedule 7 to the Planning and Development Regulations 2001 (as amended). I conclude that the need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

## **6.0 The Appeal**

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

Two third parties appeals have been lodged as follows:

6.1.1. BCM (Beechwood Lawns, Coolamber, Maple Grove) Residents Association

This appeal can be summarised as follows:

- Oral hearing request submitted.
- Previous planning application on the site was refused in 1980 by Dublin City Council and on appeal to ABP. Reason for refusal regarding access and traffic hazard is still valid.
- The application should not have been granted without a permanent access.
- Concerns raised regarding access and traffic hazard. The appeal refers to ABP Case 304733 where permission was refused for a school in Douglas, Cork for 3 No. reasons relating to traffic safety and management.
- The appellant believes that the Local Authority by approving access via Beechwood/ Coolamber will lead to more development in their estate. The Planning Authority was not impartial as it has been working on its own Draft Development Plan for Rathcoole Woodlands for the past seven years.

- There is no requirement for a new school in Coolamber as a new school has been approved for Newcastle.

#### 6.1.2. Four Districts Woodland Habitat Group

This appeal can be summarised as follows:

- Access through Coolamber Drive will result in a traffic hazard. The transportation assessment submitted as part of the Further Information Request is not informed by any consideration of where the pupils will be travelling from. The traffic assessment that informed this transportation assessment was undertaken only on a single day.
- The mobility management split of 40% of pupils by car is not realistic.
- The nature of the conditions attached to the permission indicates the inadequacy of the transportation assessment.
- The proposed development will have a negative impact on Annex 1 habitat. The Board is referred to the response from the Department of Housing, Local Government and Heritage dated the 3<sup>rd</sup> December 2024. The applicant has not proven beyond scientific certainty that the proposed development will not negatively impact the sensitive and protected alluvial woodland of Rathcoole Woodland.
- There is no justification of need for new school at this location.
- It is requested that the Board make its decision in relation to the proposed access via Coolamber Drive only and completely discount the future road for which there is no planned or long term plan for under the South Dublin County Development Plan or other statutory document.
- Appendix A attached to the appeal relates to the importance of the alluvial woodland.

#### 6.2. **Applicant Response**

- 6.2.1. The applicant has responded separately to the two third party appeals. Both these responses can be summarised as follows:

- Justification for the proposed school is supported by National Census Data and the Development Plan which recognise increasing population in housing units in this area.
- It is considered that the points raised by the appellant in relation to ecology have been sufficiently addressed in the reports submitted with the application. The response includes a number of points prepared by an ecologist in relation to the concerns raised.
- The planning application submitted for a school in 1979 cannot be considered relevant to the assessment of the current application.
- The applicant has engaged with the Council regarding the temporary access road. The temporary access road will be decommissioned and closed upon the completion of the permanent access arrangements.
- The response includes a number of points prepared by Waterman Moylan Consulting Engineers in relation to the traffic issues raised in the appeal.
- The recent approval for a new school in Newcastle will have no impact on this application as the proposed development is required within this area of increasing population.
- The appeal response notes all the previous submissions made. These were reviewed by the Planning Authority and by the applicant prior to the submission of the Further Information Response.
- In relation to a letter from the Department of Education some 45 years ago in relation to the history application on the site, it is considered that it cannot be considered relevant due to the different design standards, circumstances and planning legislation in the intervening period.
- The correspondence with Rathcoole Educate Together Parents Association is noted. It is submitted to the Board that numerous points made in this email support the provision of the proposed educational facility.

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

6.3.1. The Planning Authority Response can be summarised as follows:



- The Planning Authority confirms its decision. The issues raised in the appeal have been covered in the Chief Executive Order.

#### **6.4. Observations**

6.4.1. Three observations have been submitted which can be summarised as follows:

- No evidence showing a demand for an additional school in the area.
- Concern regarding traffic safety and access issues.
- Proposed school is premature in the absence of the proposed future road.
- There is evidence of bat activity on the site.
- No ecological screening reports have been submitted to assess the impacts of the proposed future road on ecology in the area.
- Concern regarding impact on Rathcoole Woodlands and any construction activities on or near this protected site must be appropriately assessed and monitored.

### **7.0 Assessment**

7.1. The issues of the subject appeal can be dealt with under the following headings:

- Justification for Proposed Development/ Principle of Development
- Access and Traffic
- Ecology
- Other Issues
- Appropriate Assessment

#### **7.2. Justification for Proposed Development/ Principle of Development**

7.2.1. A number of concerns were made regarding the need for the proposed development. Concerns were raised that permission was previously refused for a school on this site under PA Reg. Ref. S.A. 2018 and An Bord Pleanála Ref. PL 6/5/49015.

- 7.2.2. This application dates to c. 1979/1980 and permission was refused for one reason relating to traffic safety and at the outset, I do not consider that it is relevant to this application having regard to the considerable changes in environmental, sustainability, planning matters and road design, particularly in urban areas since this decision c. 45 years ago.
- 7.2.3. The site is located c. 350m from the main street of Rathcoole with many residential properties in the immediate vicinity. The site is located in an urban area which has a site specific 'Proposed School' objective as per Development Plan Map 8. The Core Strategy in Chapter 2 of the Plan identifies a specific objective for the wider area as follows:
- CS10 SL01: To ensure the provision of a *primary school*, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development having regard to the provisions of G17 SL02.
- The site has three zonings with the majority of the site being located in 'RES-N' where educational facilities are permitted in principle. I note that the proposed layout was redesigned in response to a Further Information Request by the Planning Authority to remove elements of the development from lands zoned as 'RU' Rural in the interests of protecting Rathcoole Woodlands. G17 SLO2 states that it is an objective to protect the Alluvial Rathcoole Woodlands.
- 7.2.4. I note that concern is raised that there is no need for this school having regard to the recent decision to grant permission for a school in the neighbouring village of Newcastle.
- 7.2.5. At present Rathcoole Educate Together National School is temporarily located on Fortunestown Lane in Saggart on an educational campus with other schools. Permission has been granted to develop this site as a permanent campus for a primary and post primary school resulting in Rathcoole Educate Together National School needing a permanent location.
- 7.2.6. The Further Information and appeal response provides very detailed information in relation to housing numbers in the vicinity and the need for a school to serve the locality and I am satisfied that adequate justification for a new school has been provided. I note that there are 2 No. existing schools in Rathcoole, one of which is a

Gaelscoil and the other has no capacity to extend. Census information indicates that there was an increase in population of c. 2000 people in Rathcoole between the 2016 and 2022 National Census.

- 7.2.7. Having regard to the location of the site, the sites zoning objective, the site specific 'Proposed School' objective for this site as outlined on Map 8 of the Development Plan and the population cohort of the area, it is my opinion that the provision of a school development at this location would be appropriate and would be compatible with the policy objectives.

### **7.3. Access and Traffic**

- 7.3.1. It is noted that a number of transport related documents have been submitted with the application including a Traffic and Transport Assessment and a School Travel Plan. In response to the Further Information Request a revised Traffic and Transport Assessment was submitted in addition to a Quality Audit including Stage 1 Road Safety Audit.
- 7.3.2. Concern is raised in the appeals and observations regarding increased traffic likely to be generated by the proposed development, overflow parking on Coolamber Drive, the adequacy of the Traffic and Transport Assessment, and the unrealistic expectation that parents and students will use 'park and stride' as set out in the School Travel Plan.
- 7.3.3. Access to the site is proposed from a temporary vehicular, pedestrian and cycle connection from Coolamber Drive at the northwest corner of the site. On delivery of a future road connection to the west via Mullaly's Lane, the Coolamber Drive access will be closed to vehicular traffic and accessible for pedestrians and cyclists only. Details of same to include bollards following the closure of at this access for vehicular traffic were submitted in the Further Information Response.
- 7.3.4. Objective CS10 SLO seeks to ensure the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, *access road* and open space is provided in tandem with new residential development having regard to the provision of G17 SL02. The link road is in accordance with the document 'Rathcoole Lands: Land Use Concept and Zoning Proposals' prepared for South Dublin County Council by Metropolitan Workshop Architects in 2021. This concept

plan was presented to the Elected Members in May 2023 and relates to a large parcel of lands (17.8 hectares) in this area and plans and proposals for development of same in the future in line with Objective CS10 SLO. South Dublin County Council have a delivery team in place in relation to the development of these lands and I refer the Board to the reports on file from the delivery team. The second report of the delivery team states that it is satisfied with the changes to the site layout and has no objection to the proposed development in the context of the preferred land use and movement concept for the wider lands.

- 7.3.5. The original Traffic and Transport Assessment submitted with the application provided for the analysis of 3 No. junctions in the vicinity of the site based on surveys carried out in 2018. This was updated by a revised Traffic and Transport Assessment submitted in response to the Further Information Request. The revised assessment provided for an analysis of 4 No. junctions in the vicinity of the site and is based on traffic counts carried out on the 18<sup>th</sup> of April 2024. The new junction included in the revised assessment is located at Beechwood Lawns/ Fitzmaurice Road.
- 7.3.6. With regard to junction capacity, the updated Traffic Assessment submitted includes the results of traffic surveys at the main junctions in the vicinity of the site. Table 7 and 8 provide an analysis of traffic increase at the 4 No. junctions in scenarios without the new link road and with the new link road. It is predicated that without the new link road there will be a 3.3% increase at junction 1, a 10.6% increase at junction 2, an 11.1% increase at junction 3 and a 1.6% increase at junction 4. With the new link road in place, there will be no change at junction 1, an increase to 14.2% at junction 2, an increase to 55.4% at junction 3 and an increase to 3.2% at junction 4. Junctions 2 and 3 are expected to have an increase higher than 10% and are modelled. Both these junctions would remain within the acceptable flow to capacity with (RFC) and queue lengths post development with the exception of junction 2 with a very slight exceedance of the RFC figure (0.87) in 2041. This degree of exceedance of the normal 0.85 standard is very minor.
- 7.3.7. The School Travel Plan outlines an Opening Modal Split in Table 5. The opening modal split is 55% for car journeys with a target modal split of 40% for car journeys. Table 6 outlines that the opening year of the school, there would be 50 pupils and this would increase to a total of 400 pupils by year 9. Peak drop offs trips in the

opening year would be 19 and this would increase to 72 in year 9 with a total of 80 car movements and 72 peak drop offs. It is expected that 50% of drop offs would be to the site and 50% of drop offs would be to a park and stride location nearby. Table 7 outlines that by year 9, the total number of pupils would be 400, 40% of these would travel by car with each car having 2 No. pupils, and there would be 72 drop off trips with 36 on site and 36 at a park and stride location. Figure 11 indicates 5 possible locations that have been identified as park and stride locations in the vicinity of the main street of Rathcoole. Park and stride is an initiative used by many schools where parents who normally drive their children to school are encouraged to park away from the school gate and walk with, or allow their children to walk the last part of the journey. Having regard to the proximity of the site to the main street of Rathcoole where a number of carparks are available, I consider that this initiative has the potential to be successful in this area.

- 7.3.8. The Roads Section queries the information submitted by the applicant in relation to traffic movements. The Roads Section consider that there would be 145 No. movements to and from the primary school at peak times whereas the applicant considers that there would be 80. Notwithstanding this, the Roads Section have recommended permission subject to conditions including the requirement to review trip generations, particularly by car to and from the development at peak times. I note that the roads report requires more information including a review of junction 4 Beechwood Lawns/ Fitzmaurice Road. I note that the predicted increases at this junction are minimal with increases in traffic at c. 1.6% without the proposed road and 3.2% with the proposed link road in place. Modelling is normally required when increases over 10% are predicted. I am not satisfied that there is a requirement for further assessment of this junction having regard to the low increases of traffic predicated at this location.
- 7.3.9. The appeal response indicates that the Traffic Assessment was based on Census Data for the area which shows car trips percentage as 37.9% and the figure of 40% is considered to be more robust. The figure of 80 movements is based on 400 pupils and with 72 trips in AM peak, this provides for a 10% reduction having regard to early drop offs. It is estimated that there would be 21 staff movements during AM peak. The calculation provided by the applicant appears to be reasonable in my view- 40% of 400 pupils travelling by car, at a rate of 2 per car equates to 80 cars

minus 10% for early drop off equals 72. I note that the Roads Department have not given any information in relation to their figure of 145 No. movements either in the report on file or in the appeal response to the Board. I am assuming that it may be based on not accounting for the proposed drop offs off-site to park and strive locations as set out in the School Transport Plan. As already set out, the school is well located for successful implementation of park and strive initiatives.

7.3.10. Section 6 of the School Travel Plan states that the appointment of an active Mobility Manager is seen as the principle means of developing and implementing the School Travel Plan. Specific Initiatives are set out in Section 4 and travel management objectives are set out in Section 5 of the Plan.

7.3.11. I note that condition 2 of the Planning Authority decision required that when the alternative access is delivered via Mullaly's Lane, the entrance to Coolamber Drive shall be boarded up. The Traffic and Transport Assessment has demonstrated increases in traffic both with and without this proposed road. I consider that it has been satisfactorily demonstrated that whilst there will be increases in traffic, all the junctions in the vicinity of the site can function within capacity and can accommodate the traffic generation arising from the proposed development. I note from the outline construction and waste management plan that there is adequate space to accommodate parking on site during the initial construction programme. I am satisfied that sufficient car parking and drop off spaces have been provided and the number of bicycle spaces provided significantly exceeds the Development Plan requirements.

7.3.12. This is an urban area in close proximity to the main street of Rathcoole and a certain level of congestion is to be anticipated in such locations. I consider that the proposed school must have due regard to putting the most effective traffic management system in place to minimise the impact of school traffic on the surrounding residents. I note that this area already suffers from traffic congestion at peak times by motorists using the local roads serving residential estates to avoid the main street. Nonetheless, I consider that the locational context of the site is excellent and the proximity to the main street of Rathcoole and a number of public and private car parks allows opportunities to develop alternative options such as park and stride and facilitates opportunities for walking and cycling to school in lieu of car based traffic. The school will operate with 50 pupils in the first year rising to 400 pupils by

the 9<sup>th</sup> year. I am satisfied that given the nature of the development and the locational context of the site, the proposed development can be accommodated without causing traffic hazard.

#### **7.4. Ecology**

7.4.1. A number of documents relating to ecological matters have been submitted with the application including an Arboricultural Report, an Ecological Impact Assessment, an Invasive Species Survey and an Appropriate Assessment Screening Report. An updated Ecological Impact Assessment was submitted in November 2024 which incorporated revised SuDS proposals.

7.4.2. The main concerns raised relate to the impact on habitat in the Rathcoole Alluvial Woodland adjacent to the site. Concern is also raised in relation to bat activity in the area.

##### Impact on Rathcoole Woodlands

7.4.3. The proposed development lies adjacent to Rathcoole Woodlands. The woodland contains the priority 1 habitat 91EO *Alluvial forests with Alnus glutinosa and Fraxnus excelsior* of the Habitats Directive, and a spring within the woodland possibly corresponds to a second priority habitat annex 1 7220 *Petrifying springs with tufa deposits*. Also within the woodland area, swamp vegetation corresponding to the *annex 1 habitat Hydrophilous tall herb communities 6430* occurs. The area of flower rich meadow located adjacent to the park on the northern margin of the site shows a clear correspondence to annex 1 habitat 6510 Lowland hay meadow.

7.4.4. Concern has been raised that the proposed school development may have an adverse impact on the hydrological conditions supporting the continued existence of the priority and annex 1 habitats present in the woodland areas adjacent to the site.

7.4.5. Updated drawings were submitted in response to the Further Information Request by the Planning Authority. The drainage proposals were revised to remove all underground tanks. The proposed drainage layout for the surface water utilises SuDS elements to provide treatment and storage throughout the whole site. The updated SuDS strategy and drainage layout details are submitted on Figures 10 and 11 of the updated Ecological Impact Assessment submitted on the 20<sup>th</sup> of November 2024, in the response to Further Information on the same date by Waterman

Consulting Engineers, and on the SuDS Strategy Drawing P201 Rev A and Drainage layout drawing P200 Rev A submitted with the response.

7.4.6. A hydrogeological assessment was carried out by Arup Ireland Partner Limited to assess the impact on the hydrological requirements of the woodland. The report submitted in the Further Information Response concludes the following:

- During the construction stage detention Basin 2 may extend below the winter water table if the works are completed during a wet winter, however the estimated inflows and zone of influence are negligible due to the limited depth of excavation and moderately low permeability of the subsoil.
- As there are no other discernible potential impact expected during construction the result predicted impacts on the hydrogeological environment during construction are negligible.

During the operational phase it was considered that detention Basin 2 may extend below the winter table but will not impede groundwater flow.

- There are no basements or significant underground structures associated with the proposed development and therefore no significant impacts on groundwater flow.
- There are a number of SuDS measures incorporated into the design which will promote the infiltration of runoff from hard surfaces to the ground. It is expected that runoff will be more limited by the low infiltration capacity of the soil and that there will be a negligible difference due to the already low recharge rate for the site.
- It was concluded that impacts on the hydrogeological environment are negligible during the operational phase of the proposed development.

7.4.7. The Ecological Impact Assessment considers that no significant environmental impacts are likely in relation to the construction or operation of the development.

7.4.8. A submission from the DoEHLG notes the revised hydrological assessment and the modified design of the surface water drainage system omitting the installation of underground attenuation tanks as originally proposed. It concludes that the school development as now planned would not have long term adverse impacts on the adjacent woodland areas and the annexed habitats present in them by altering their hydrology.



- 7.4.9. The appeal response acknowledges the sensitivities of the hydrological regime and sets out the conclusion of same as set out above. It is stated that detailed mitigation measures including ecological supervision will be in place on the site. These mitigation measures are set out in Table 6 of the Ecological Impact Assessment.
- 7.4.10. In terms of the hydrological regime and the impact on protected habitats, this matter is extremely important and the sensitivity of same is recognised by the Development Plan. This Annex 1 habitat is protected under Specific Objective G17 SL02 of the County Development Plan- 'To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole Woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Wood and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status.'
- 7.4.11. I am satisfied that the modified surface water drainage scheme has taken account of the concerns raised. As such the modified design would not have long term adverse impacts on the adjacent woodland and the annexed habitats present by altering their hydrology. I also note that the design was altered following the Further Information request to remove all development from the lands zoned as 'RU' – 'To protect and improve rural amenity and to provide for the development of agriculture.' In this regard the planner's report states that the most appropriate way of protecting and maintaining the status of the woodland and minimising future impacts, is ensuring that no development takes place on the 'RU' zoned lands. I concur with this approach and consider that the revised drawings are acceptable in this regard. I note that this wider area will be developed further in the future including a road and Objective CS10 SLO 1 seeks to 'ensure the provision of a primary school, library hub, 2 full sized GAA pitches, access road and open space is provided in tandem with new residential development having regard to the provisions of G17 SL02.' I note that concerns have been raised in regard to the impact on Rathcoole Woodlands however, any future application will be subject to the planning process and as set out above, Objective G17 SL02 seeks to ensure the adequate protection and augmentation of the identified Rathcoole Woodlands.

#### Bats

- 7.4.12. I note that the observation submitted by Annie Flynn advises that there was bat activity in the area on Saturday the 7<sup>th</sup> of September 2024, between 8.30 and 9pm at the interface between the last house on Coolamber Drive and the alluvial treeline. Within 30 minutes there were 13 occurrences of sustained bat feeding activity. It is queried if this is a hotspot for bats and if there are roosts nearby.
- 7.4.13. The Ecological Impact Assessment submitted with the application reviewed existing bat records from Bat Conservation Ireland's National Bat Records Database within a 2km<sup>2</sup> grid of the site. There have been recorded bat sightings in the wider area. A site specific bat survey was carried out on the 25<sup>th</sup> of September 2023 and is attached to Appendix 1 of the assessment. No bats were noted emerging from trees on site. No evidence of a bat roost was found in the onsite trees. A single Lesser Noctule was noted entering the site from the west north boundary. The survey also noted a Lesser Noctule bat briefly foraging on the site. It is stated that no bat roosts or potential bat roosts will be lost due to this development. It is considered that the site is of relatively low importance to the bat population. It is recommended that a post construction assessment of lighting will be required. Mitigation measures outlined include lighting at all stages to be done sensitively with no direct lighting of treelines and post construction assessment and compliance with proposed lighting strategy. In addition, it is suggested that construction lighting will only be in place when activity is on site in consultation with the project ecologist and construction lighting will not exceed 1 lux.
- 7.4.14. I note that all Irish bat species are protected under the Wildlife Act (1976) and the Wildlife Amendment Act (2000). There is no evidence of bats using any of the trees on the site for roosting therefore the proposed development will not result in the loss of any bat roost as there are no bats roosting on site. It is possible that there may be roosts nearby in the adjacent woodland. Notwithstanding this, there is no evidence before me that there would be any significant impacts on bats having regard to the absence of roosts on the site and the mitigation measures provided for the protection of bats in the ecological impact assessment. The planner's report has considered that any potential impacts could be mitigated by appropriate lighting. I am satisfied that the mitigation measures outlined consider this matter comprehensively as set out above. It is stated that floodlighting of pitches is unlikely to be acceptable. I note that Condition No. 19 required that there should be no floodlighting of any kind

erected on the site without the benefit of planning permission in the interests of residential amenity and the protection of the environment. I consider that this condition is appropriate and should be included in any grant of permission.

- 7.4.15. Having regard to the foregoing, in relation to ecological impacts, I am generally satisfied the development as proposed is acceptable, subject to conditions requiring the proposed mitigation measures set out in the ecology report to be implemented. I note the submission received from Inland Fisheries Ireland, including recommended conditions to ensure protection of the river ecology. The submission highlights concerns in particular in relation to a serious incident on the Camac River in August 2023, but states no objection subject to conditions in relation to protection of the aquatic environment during construction. I am satisfied that these matters are dealt with sufficiently in the submitted information in terms of the appointment of an ecologist and the mitigation measures outlined in the Outline Construction and Waste Management Plan and the Ecology Report in relation to the protection of watercourses and biodiversity.
- 7.4.16. I note that the submission from the DoEHLG report recommends permission subject to conditions including a condition to omit the proposed planting of non-native wildflower seeds on the site. I note that this has been included in the Condition No. 10 by the Planning Authority and I recommend that the Board retain this condition.
- 7.4.17. I am satisfied the proposed development has appropriately considered the ecology of the site and the surrounding area. Mitigation measures to protect the site are included in the ecology report and the outline construction and waste management plan and I am satisfied that the developer has appropriately considered these matters in the design and revised details submitted in relation to SuDS measures and the revised layout.

## **7.5. Other Matters**

### Archaeology

- 7.5.1. The proposed development is located partially within the zone of influence of recorded monument DU021-030 Settlement cluster. I note that the applicant submitted a letter to the Planning Authority in response to a Further Information

request in relation to a delay in carrying out testing. The report of Department of Housing, Local Government and Heritage notes that geophysical testing has been carried out since then but it is still awaiting a report. The Department recommended clarification of Further Information in this regard. The Planning Authority considered that this matter could be addressed by condition. I am satisfied that this approach is satisfactory and I consider that a similar condition should be included in order to conserve the archaeological heritage of the area and the protection of any archaeological remains that may exist within the site.

## **8.0 AA Screening**

- 8.1. In accordance with Section 177U(4) of the Planning and Development Act 2000 (as amended) and on the basis of objective information, I conclude that that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects.

It is therefore determined that Appropriate Assessment (Stage 2) [under Section 177V of the Planning and Development Act 2000] is not required.

This conclusion is based on:

- Objective information presented in the applicant's reports;
- The limited zone of influence of potential impacts;
- Standard construction and operational surface water pollution controls that would be employed regardless of proximity to a European site and the effectiveness of same;
- Distance from European Sites;
- The limited potential for pathways to any European site; and
- The nature and extent of predicted impacts, which would not affect the conservation objectives of any European Sites.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion

## 9.0 Recommendation

- 9.1. I recommend permission be **Granted**, subject to Conditions, for the reasons and considerations sets out below.

## 10.0 Reasons and Considerations

Having regard to the provisions of the South Dublin County Development Plan 2022-2028 including the land use zoning objective for the area together with the 'proposed school' objective on the site and the relevant policies and objectives of the Development Plan, and having regard to the design, scale, and purpose of the proposed development it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the visual or residential amenities of the area, would not endanger public safety by reason of traffic hazard or obstruction of road users. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application on 20<sup>th</sup> day of December 2023, as amended by the further plans and particulars received by the planning authority on the 20<sup>th</sup> day of November 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. The mitigation measures set out in Table 6 of the Ecological Impact Assessment Report prepared by Altamar Ltd. as submitted with the application to the planning

authority on the 20<sup>th</sup> day of December 2023 as part of the application shall be implemented in full.

**Reason:** To mitigate the loss of biodiversity on the site.

3. Details of the materials, colours and textures of all the external finishes to the proposed buildings 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.

4. (a) The temporary access shall be via Coolamber Drive shall be in accordance with the plans submitted by the applicant. This shall become a pedestrian and cycle access when an alternative vehicular access is delivered via Mullaly's Lane and bollards shall be put in place to prevent vehicular access in accordance with Drawing No. P115 submitted to the Planning Authority dated the 20<sup>th</sup> day of November 2024 within 6 months of the closure of this access.

(b) The developer shall erect a gate on the boundary fence at the location of the future road from Mullany's Lane.

(c) The recommendations of the Stage 1 Road Safety Audit shall be implemented into the design.

**Reason:** In the interest of traffic safety.

5. The development shall be carried out and operated in accordance with the provisions of the School Transport Plan submitted to the Planning Authority on the 20<sup>th</sup> day of December 2023. The specific measures detailed in Section 4 and Section 5 of the School Transport Plan to achieve the objectives and modal split targets for the development 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 to achieve the target modal split set out in Table 6 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. Prior to the commencement of development the developer shall enter into a Connection Agreement(s) with Uisce Éireann (Irish Water) to provide for a service connection(s) to the public water supply and/or wastewater collection network.

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

7. During the construction and the operational phases, uncontaminated surface run-off within the development shall be collected and managed in accordance with the surface water drainage systems detailed in the plans and particulars submitted to the Planning Authority dated the 20<sup>th</sup> day of November 2024.

**Reason:** In the interests of environmental protection and to prevent water pollution.

8. The use of the school outside of school hours and outside term time shall be made available where it will be of benefit to the wider community.

**Reason:** In the interests of the proper planning and sustainable development of the area.

9. No floodlighting of the ball courts shall be permitted without a separate planning application having first been obtained. The ball courts shall not be used between the hours of 2000 and 0830.

**Reason:** In the interests of environmental protection and residential amenity.

10. The mitigation and construction management measures set out in the Outline Construction Management Plan as submitted with the application to the planning authority on the 20<sup>th</sup> day of December 2023 as part of the application shall be implemented in full.

**Reason:** In the interests of the environment, public health and proper construction management.

11. Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a detailed Construction Environmental Management Plan (CEMP) for the written agreement of the planning authority. The CEMP shall incorporate details for the following:

(i) collection and disposal of construction waste,

(ii) surface water run-off from the site,

(iii) on-site road construction, and

(iv) environmental management measures during construction including working hours, noise control, dust and vibration control and monitoring of such measures.

A record of daily checks that the construction works are being undertaken in accordance with the CEMP shall be kept at the construction site office for inspection by the planning authority. The agreed CEMP shall be implemented in full in the carrying out of the development. The CEMP shall demonstrate due regard to Inland Fisheries Ireland's "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters, 2016".

**Reason:** In the interest of environmental protection, residential amenities, public health & safety, and environmental protection.

12. The internal road and footpath network serving the proposed development including vehicle and cycle parking areas and footpaths shall comply with the detailed standards of the planning authority for such road works.

**Reason:** In the interest of amenity and of traffic and pedestrian safety.

13. The developer shall facilitate the archaeological appraisal of the site and shall provide for the preservation, recording and protection of archaeological materials or features which may exist within the site. In this regard, the developer shall:

(a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development, and

(b) employ a suitably-qualified archaeologist prior to the commencement of development. The archaeologist shall assess the site and monitor all site development works.

The assessment shall address the following issues:

(i) the nature and location of archaeological material on the site, and

(ii) the impact of the proposed development on such archaeological material.

A report, containing the results of the assessment, shall be submitted to the planning authority and, arising from this assessment, the developer shall agree in writing with the planning authority details regarding any further archaeological requirements



(including, if necessary, archaeological excavation) prior to commencement of construction works.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

**Reason:** In order to conserve the archaeological heritage of the area and to secure the preservation (in-situ or by record) and protection of any archaeological remains that may exist within the site.

14. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, between 0900 to 1300 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the residential amenities of property in the vicinity.

15. A plan containing details for the management of waste and, in particular, recyclable materials) within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials and for the ongoing operation of these facilities shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

**Reason:** To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.

16. The landscaping scheme, as submitted to the planning authority on the 20<sup>th</sup> day of November 2024 shall be carried out no later than the first planting season after the first occupation of each phase of the development on site.

The following shall be carried out:

- a) All trees and plant species shall be native species and no invasive species are permitted.
- b) No wildflower seeds of non-native origin shall be part of the landscaping. Proposed meadow areas and the riparian strip shall be managed by an appropriate mowing regime to encourage the establishment of locally occurring wildflowers.

c) All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

**Reason:** In the interest of residential and visual amenity and to preserve local biodiversity.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

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Emer Doyle  
Planning Inspector

13<sup>th</sup> May 2025

## Appendix 1

### Form 1 - EIA Pre-Screening

<b>Case Reference</b>	An Bord Pleanála 321696-25
<b>Proposed Development Summary</b>	Construction of primary school and all ancillary site development works
<b>Development Address</b>	Lands south of Coolamber Drive, Rathcoole.
	<b>In all cases check box /or leave blank</b>
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b>  (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)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.
<b>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<b>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?</b>	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.  <b>Preliminary examination required. (Form 2)</b>  <b>OR</b>	Class 10(b)(vi) – Infrastructure Projects. Urban development which would involve an area greater than 10 ha in a built up area. The site area is below 10 ha and measures 1.8 hectares and is therefore sub-threshold.

<b>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</b>	
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<b>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)?</b>	
<b>Yes</b> <input type="checkbox"/>	
<b>No</b> <input checked="" type="checkbox"/>	<b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b>

**Inspector:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Form 2 - EIA Preliminary Examination

<b>Case Reference</b>	An Bord Pleanála 321696-25
<b>Proposed Development Summary</b>	Construction of primary school and all ancillary site development works
<b>Development Address</b>	Lands south of Coolamber Drive, Rathcoole.
<b>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</b>	
<b>Characteristics of proposed development</b>  (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).	<p>The subject development comprises the construction of a new primary school c. 350m from the main street of Rathcoole, Co. Dublin.</p> <p>The design and size of the proposed development is typical for development of this type. The proposed development would not be exceptional in the context of the existing environment.</p> <p>Waste would be generated during the construction phase. However, I do not consider that the level of waste generated would be significant in the local, regional or national context.</p>
<b>Location of development</b>  (The environmental sensitivity of geographical areas likely to be affected by the development in particular	<p>The proposed development is located on zoned serviced lands within an urban area.</p> <p>It is adjacent to Rathcoole Woodlands- See ecology section of report for further details.</p>

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).	<p>Archaeology- partially within zone of notification for recorded monument DU021-030.</p> <p>The development will implement SUDS measures to control surface water run-off.</p>
<p><b>Types and characteristics of potential impacts</b></p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>Having regard to the nature of the proposed development, its location relative to 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.</p>
<b>Conclusion</b>	
<b>Likelihood of Significant Effects</b>	
<b>There is no real likelihood of significant effects on the environment.</b>	

**Inspector:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**DP/ADP:** \_\_\_\_\_ **Date:** \_\_\_\_\_

(only where Schedule 7A information or EIAR required)

## Appendix 2

### Screening for Appropriate Assessment

#### Test for likely significant effects

#### Description of the project and local site characteristics

<b>Brief description of project</b>	20 No. Classroom primary school on site of c. 1.8 hectares in a serviced urban area in Rathcoole, Co. Dublin.
<b>Brief description of development site characteristics and potential impact mechanisms</b>	The site is located within a residential urban environment. The nearest watercourse to the site is a stream off the Camac River. This shares downstream connectivity with Dublin Bay.
<b>Screening report</b>	Y
<b>Natura Impact Statement</b>	N
<b>Relevant submissions</b>	<p>Submission from Inland Fisheries Ireland</p> <p>Appeal and Observations in relation to ecology and in particular to Rathcoole Woodlands which is not a designated site. I will deal with this separately in ecology section of this report.</p> <p>DoEHLG submission in relation to Rathcoole Woodlands which I will deal with separately in ecology section of this report.</p>

#### Identification of relevant European sites using the Source-pathway-receptor model

The site is not located within or adjacent to any European site and will not result in any direct loss of, or impact on, habitats in such sites.

European Site (code)	Qualifying interests <sup>1</sup> Link to conservation objectives NPWS	Distance from proposed development (km)	Ecological connections <sup>2</sup>	Consider further in screening <sup>3</sup> Y/N
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	<b>links - all sites checked 13/05/25</b>			
Glenasmole Valley SAC	<a href="#">Glenasmole Valley SAC   National Parks &amp; Wildlife Service</a>	6.3	N	N
Wicklow Mountain SPA	<a href="#">Wicklow Mountains SPA   National Parks &amp; Wildlife Service</a>	10.7	N	N
Red Bog Kildare SAC	<a href="#">Red Bog, Kildare SAC   National Parks &amp; Wildlife Service</a>	10.1	N	N
Wicklow Mountains SAC	<a href="#">Wicklow Mountains SAC   National Parks &amp; Wildlife Service</a>	7.2	N	N
Poulaphouca Reservoir SPA	<a href="#">Poulaphouca Reservoir SPA   National Parks &amp; Wildlife Service</a>	10.9	N	N
South Dublin Bay SAC	<a href="#">South Dublin Bay SAC   National Parks &amp; Wildlife Service</a>	17.6	Y	Y
North Dublin Bay SAC	<a href="#">North Dublin Bay SAC   National Parks &amp; Wildlife Service</a>	20.7	Y	Y
Rye Water Valley/ Carton SAC	<a href="#">Rye Water Valley/Carton SAC   National Parks &amp; Wildlife Service</a>	9.3	N	N

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

There are no hydrological pathways to the European Sites listed in the above table other than a tentative link to Dublin Bay hydrologically via the Camac River. At its closest point the site is approximately 17km away. In reality however, this distance is greater as hydrological pathways follow the course of the drainage network to Dublin Bay. Wastewater from the proposed development will be treated at Ringsend WWTP and potential impacts via the Camac River are unlikely given the distance.

### **AA Screening matrix**

<b>Site name</b> <b>Qualifying interests</b>	<b>Possibility of significant effects (alone) in view of the conservation objectives of the site*</b>
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	Impacts	Effects
<b>South Dublin Bay SAC</b>  Mudflats and sandflats [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals [1310] Embryonic shifting dunes [2110]	Direct: None  Indirect:  Negative impacts temporary on surface water due to construction related emissions including increased sedimentation and construction related pollution	None.
	<b>Likelihood of significant effects from proposed development (alone): N</b>	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects? N</b>	
	<b>Possibility of significant effects (alone) in view of the conservation objectives of the site*</b>	
	Impacts	Effects
<b>North Dublin Bay SAC 000206</b>  Mudflats and sandflats [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals [1310] Atlantic salt meadows [1330] Mediterranean salt meadows [1410]	Direct- None.  Indirect  Negative impacts temporary due to construction related emissions including increased sedimentation and construction related pollution.	None.



Embryonic shifting dunes [2110]  Shifting dunes along the shoreline with Ammophila arenaria [2120]  Fixed coastal dunes with herbaceous vegetation [2130]  Humid dune slacks [2190]  Petalophyllum ralfsii (Petalwort) [1395]		
	<b>Likelihood of significant effects from proposed development (alone): N</b>	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects? N</b>	
<b>Further Commentary</b>  Inland Fisheries Ireland note that the site is within the Camac River catchment and note a major incident with a total loss of aquatic species in 2023. They have recommended that there should be an appropriate informed person in place to ensure that silt fencing and other appropriate protection measures are in place.  I note that this is addressed in the Ecological Report submitted with the application and it is intended to employ a project ecologist to oversee the works and to put silt protection measures in place. All measures to protect watercourses are set out in Table 6 of this document. Section 10 of the Outline Construction and Waste Management Plan also outlines a number of measures to protect water quality.  The construction phase will be temporary. Having regard to the range of measures proposed in the outline construction and waste management plan and the ecological report and the distance to the Dublin Bay sites, I consider that the potential for significant surface water effects to downstream sensitivities during the construction phase would be satisfactorily addressed by these measures.  For the operational stage, the surface water drainage network has been designed in accordance with SuDS principles. Ongoing regular operational monitoring and maintenance of drainage and the SuDS measures will be incorporated into the overall management strategy to ensure that there are no impacts on water quality. Consistent with my assessment above I would accept that the potential for significant surface water effects to downstream sensitivities during the operational phase is negligible considering the inclusion of suitable SuDS measures and a petrol interceptor.		

It is my view that these are best practice standard construction management and surface water management measures which have not been designed or intended to avoid or reduce any harmful effects of the project on a European Site. The measures are otherwise incorporated into the applicant's Outline Construction and Waste Management Plan and the ecology report submitted with the application and the updated report following updated SuDS measures, and I do not consider that they include any specific measures that would be uncommon for a project of this nature. Therefore, I am satisfied that these measures can be considered in the AA Screening process.

**Step 4 Conclude if the proposed development could result in likely significant effects on a European site**

I conclude that the proposed development (alone) would not result in likely significant effects on North Dublin Bay SAC and South Dublin Bay SAC. The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project.

No mitigation measures are required to come to these conclusions.

**Overall Conclusion- Screening Determination**

In accordance with Section 177U(4) of the Planning and Development Act 2000 (as amended) and on the basis of objective information, I conclude that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects.

It is therefore determined that Appropriate Assessment (Stage 2) [under Section 177V of the Planning and Development Act 2000] is not required.

This conclusion is based on:

- Objective information presented in the applicant's reports;
- The limited zone of influence of potential impacts;
- Standard construction and operational surface water pollution controls that would be employed regardless of proximity to a European site and the effectiveness of same;
- Distance from European Sites;
- The limited potential for pathways to any European site; and
- The nature and extent of predicted impacts, which would not affect the conservation objectives of any European Sites.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.