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25<sup>th</sup> May 2023

**RE: Planning Application SDZ22A/0352 – Further Information Request: Construction of two new three storey primary school buildings for Gaelscoil na Camoige agus Gaelscoil Chluain Dolcain, Clondalkin**

Dear Sir/Madam,

The National Transport Authority (the “NTA”) has reviewed the Further Information relating to the subject planning application and, based on the *Transport Strategy for the Greater Dublin Area 2022-2042* (the “Transport Strategy”) and wishes to submit the following observations and recommendations.

**1. Overview**

In its original submission dated 10th October 2022, the NTA made the following recommendations:

**Car Parking**

- The number of car parking spaces provided should be reduced to comply with Development Plan standards
- Car parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that provision does not exceed the maximum Development Plan standards for all staff and pupils within the combined campus.

**Cycle Parking**

- Cycle parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that sufficient provision is made to meet the minimum Development Plan standards for all staff and pupils within the combined campus.
- Safe, secure cycle parking should be provided as part of the development of the site. There should be a clear, direct path from the school gates to the cycle parking facility.
- For clarity, bicycle parking should comprise Sheffield-type stands, located 1.2m apart and be covered;
- Cycle parking should also be provided for staff. Welfare facilities such as showers and lockers should be provided to encourage staff to travel by active modes;

**Drop-off/Set Down**

- Clarity should be provided in terms of the quantum of drop-off spaces, its location, and a full justification for both in terms of road safety and promotion of sustainable transport modes.

- In the event of a grant of permission, a condition is attached requiring the applicant to monitor the operations of the set-down annually area in order to ensure the following:
  - That conflict between motorists and children on foot and on bicycles does not occur;
  - That children living within walking and cycling distance are not being driven to school;
  - That the car trips attracted to the facility are not causing operational issues on the local road network, particularly for buses.
  - In the event that these issues are emerging due to the presence of a dedicated drop-off facility, a mechanism for its removal in future is recommended for inclusion in any grant of permission

### **Mobility Management**

- The NTA recommends that a revised and comprehensive MMP is prepared addressing the issues raised about above in particular that:
  - Clearly identifies current travel patterns including mode share;
  - Sets medium and long term mode share targets moving towards mode sustainable travel; and
  - Commits the applicant to the implementation of the Action Plan's behavioural change measures.

## **2. Further Information**

A request for Further Information was issued in relation to the subject application of which point four requested the following:

*'(a) The Roads Department and National Transport Authority have raised concerns regarding the number of car parking spaces proposed. The overall car parking provision should be reviewed and reduced to the maximum CDP rate, or lower if appropriate. The number of spaces should not exceed the maximum CDP provision. In this regard, the applicant is also requested to clarify the number of classrooms for the existing post-primary school. (b) The applicant is requested to review and provide bicycle parking in terms of the overall site, including the existing post-primary school (and including staff). Information should be submitted that identifies clear and direct routes for cyclists through the site from the school gates. (c) The applicant is requested to clarify the quantum of drop-off spaces, their locations, and a full justification for the drop-off spaces, in terms of road safety and promotion of sustainable transport modes.*

*Section 2.9 of the 'Planning Report' states that 26no. car parking spaces are provided for each new 16 classroom school which is in excess of the South Dublin County Development Plan standards which allow a maximum of 1 space per classroom. It is the view of the NTA that the provision of car parking, in excess of the Development Plan standards, should not be permitted as this serves to facilitate and encourage travel to/from the school by car.'*

## **3. Observations**

### **Car Parking**

A letter from MCOH Architects, submitted as part of the Further Information, includes information in relation to car parking. It is stated that a total of 103 car parking spaces would serve the entire development (existing and proposed). It is noted from the information provided in the letter that, between the 3 schools that will occupy the site, there will be a total of 65 classrooms. The maximum parking rates for schools is set out in the South Dublin Development Plan 2022, Section 12.7.4 which provides for a maximum of 1 car parking space per classroom. This would allow for 65 car parking

spaces for the school campus in its entirety. From the information provided it appears that the proposed car parking is in excess of the standards set out in the Development Plan.

As set out in its original submission, it is the view of the NTA that car parking should be assessed in terms of the entire shared campus and that the total quantum should not exceed the maximum Development Plan standards for all staff and pupils within the combined campus in order to encourage travel by sustainable modes.

### ***Recommendation***

In the event of a grant of permission a condition should be included limiting the quantum of car parking associated with the school campus in its entirety to comply with the standards set out in Section 12.7.4 of the South Dublin Development Plan 2022.

### **Cycling**

Cycle parking rates for schools are set out in the South Dublin Development Plan 2022, Section 12.7.1 and provide for a minimum of 1 cycle parking space per 5 staff and 1 per 5 students.

The letter from MCOH Architects submitted as part of the Further Information refers to cycle parking provision. It is stated that a total of 108 spaces will be provided for the existing post-primary school (increasing from 24 at present). It is further stated that the post primary school has, at present, 439 pupils and 32 staff which would require a minimum 95 cycle parking spaces. The proposed number of cycle spaces is in excess of the minimum requirements and is considered acceptable. In relation to the remaining 2 schools it is noted that they will have a total of 42 staff however the number of pupils is not provided. It is proposed that 107 spaces are provided for each of these schools. The proposed location of the cycle parking appears to be generally acceptable however it is not clear as to the proposed design of the cycle parking or proposals to clearly mark direct paths from the school gates to the cycle parking facility.

It is noted that a number of 'pedestrian gates' are identified in Drawing Drawing 20-13 P0003. These gates should provide for, and be identified as, 'pedestrian & cyclist gates' in order to improve access by both walking and cycling and reduce conflict between these modes and the car.

It is considered that these observations could be dealt with by way of conditions in the event of a grant of permission.

### ***Recommendation***

In the event of a grant of permission conditions should be included requiring the following:

- The quantum of cycle parking within the school campus complies with the standards set out in Section 12.7.4 of the South Dublin Development Plan 2022;
- The 'pedestrian gates' on Drawing 20-13 P0003 should provide for, and be identified as 'pedestrian & cyclist gates' and the provision of such should be retained;
- Pathways for cyclists from the entrances through the campus to the cycle parking should be clearly marked;
- Bicycle parking should comprise Sheffield-type stands, located 1.2m apart and be covered.

### **Drop-off / Set Down**

In its original submission the NTA noted the intention to provide an unspecified number of set-down areas within the school campus. The 'Proposed Road Layout' drawing (8064-2503) identifies these as 'Car & Bus Set Down' Area and they are located along the main access road which also leads to the car parking. It was also noted that evidence has emerged in recent years that such facilities can cause a

number of issues including conflict with pedestrians/cyclists and reducing the attractiveness or other modes.

It is also noted that COS8 Objective 7 of the South Dublin Development Plan states the following: *'To facilitate provision of parking for staff and parents and 'drop-off' areas for new schools, only as part of a mobility management plan, where a need has been demonstrated and where active travel modes (walking and cycling) and public transport have been prioritised having regard to the protection of nearby residential amenity'*.

The letter from MCOH Architects submitted as part of the Further Information states that 'the proposed drop off spaces re designed to ensure that any queuing associated with drop off traffic at peak times will be accommodated within the site. This will increase safety for pedestrians and motorists in the area of the school

The NTA reiterates its view that, providing for a high number of set down spaces will encourage unsustainable travel behaviour and that, in this instance, the MMP does not sufficiently demonstrate that active travel modes have been prioritised. Given the size of the overall school campus and the proposal that these set down areas are for both buses and cars, the NTA would caution that this drop-off facility may lead to greater traffic and transport issues than it seeks to address.

### **Recommendation**

In the event of a grant of permission, a condition is attached requiring the applicant to monitor the operations of the set-down annually area in order to ensure the following:

- That conflict between motorists and children on foot and on bicycles does not occur;
- That children living within walking and cycling distance are not being driven to school;
- That the car trips attracted to the facility are not causing operational issues on the local road network, particularly for buses.

In the event that these issues are emerging due to the presence of a dedicated drop-off facility, a mechanism for its removal in future is recommended for inclusion in any grant of permission.

### **Mobility Management Plan**

It is noted that no Further Information was requested in relation to the Mobility Management Plan.

As stated in its original submission, the NTA note that the existing plan fails to do the following:

- Clearly identify current travel patterns including mode share;
- Set medium and long term mode share targets moving towards mode sustainable travel; and
- Commit the applicant to the implementation of the Action Plan's behavioural change measures.

The MMP should set out short and medium term mode share targets, consistent with the vision and objectives of the Transport Strategy, in that this will increase travel by walking, cycling and public transport and reduce car travel for staff and student. Furthermore the Action Plan should set out a suite of measures with a concrete implementation plan/timeframe.

The NTA would like to take this opportunity to draw the applicant's attention to the following documents published in more recent years:

- i. Toolkit for School Travel;
- ii. Workplace Travel Plans – A Guide for Implementers; and
- iii. Achieving Effective Workplace Travel Plans – A Guide for Local Authorities.

Together these documents provide a comprehensive template for high quality Travel Plans / MMPs based on the experience gained from the Green Schools Travel programme and Smarter Travel Workplaces and Campuses programme. They can inform a revised MMP.

***Recommendation***

In the event of a grant of permission a condition should be included requiring that a revised and comprehensive MMP is prepared addressing that:

- Clearly identifies current travel patterns including mode share;
- Sets medium and long term mode share targets moving towards mode sustainable travel; and
- Commits the applicant to the implementation of the Action Plan's behavioural change measures.

I trust that the views of the Authority will be taken into account in the further consideration of this application.

Yours sincerely,



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**Michael MacAree**  
***Head of Integrated Strategic Planning***