

Z15 Compliance Statement

Fortfield Road, Terenure, Dublin 6W

Prepared by MCG Planning
on behalf of 1 Celbridge West Land Limited
December 2024

1. INTRODUCTION

McGill Planning Limited, 9 Pembroke Street Upper, Dublin 2 is instructed by the applicant 1 Celbridge West Land Limited, 27 Merrion Square, Dublin 2, to prepare this Z15 Institutional Lands Compliance Statement in support of an application for a Large-scale Residential Development (LRD) at Fortfield Road, Terenure, Dublin 6W. The proposed development is as follows:

The development will comprise a Large-Scale Residential Development (LRD) on a site at Fortfield Road, Terenure of 284 no. units delivering 19 no. houses and 265 no. apartments made up of studios; 1 beds; 2 beds; 3 beds; and 4 beds. The development will also provide community, cultural and arts space and a creche. Communal internal space for residents will also be delivered. Provision of car, cycle and motorbike parking will be provided throughout the development, including at basement and surface level. Vehicular/pedestrian/cyclist access from Fortfield Road. Proposed upgrade works to the surrounding road network is also included. All associated site development works, open space, services provision, ESB substations, plant areas, waste management areas, landscaping (both public and communal) and boundary treatments.

2. PURPOSE OF THIS COMPLIANCE STATEMENT

The Compliance Statement along with the Masterplan contained within the Architectural Design Statement by Urban Agency has been prepared on behalf of the applicant in co-ordination with the Carmelite Province Order who own the application site and the wider lands that include Terenure College Senior School. This Statement, in conjunction with the masterplan, provides a vision for the future development potential of the lands, including, if necessary, additional educational or institutional uses and facilities on the Terenure College lands. This report clarifies which section of section 14.7.14 is applicable to this proposal under the Z15 zoning. It will then set out how the proposal will address, in line with the Z15 zoning, the following key elements as set out in section 14.7.14.

Section 14.7.14 Community and Social Infrastructure – Zone Z15 identifies that Z15 lands comprise a variety of sites “often consisting of long established complexes of institutional/ community buildings and associated open grounds.” The Development Plan acknowledges that given the variety of land holdings under the Z15 zonings some land is still actively used, partially used or ceased use. As a result it has identified criteria for:

- A) Development on Z15 lands
- B) Development Following Cessation of Z15 use.

A) Development on Z15 Lands:

“Limited residential/commercial development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the landowner/applicant that the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands.

The following criteria must also be adhered to:

- i. *In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*
- ii. *Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*
- iii. *Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*
- iv. *The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.*
- v. *In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*
- vi. *In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

For clarity, the above criteria do not apply to residential institution use, including ancillary staff accommodation or assisted living/retirement home. Student accommodation will only be considered in instances where it is related to the primary use on the Z15 lands. Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal.

B: Development Following Cessation of Z15 Use

The cessation of an existing Z15 institutional/social/community use on a site or change in land ownership does not extinguish/ negate the purpose of these lands for community and social infrastructure use. It is the objective of the Council that such lands should be retained for a use in accordance with the zoning objective unless exceptional circumstances prevail.

In such circumstances, (i.e. cessation of use on a Z15 site or disposal of all or part of a Z15 site), a variation or material contravention to the development plan will be required to develop such lands for residential/commercial purposes. Any such variation/material contravention would need to be supported by a detailed community and social infrastructure audit which should clearly demonstrate why the land is not viable/ suitable for social and community use (defined as the physical infrastructure necessary for successful communities, i.e. community infrastructure such as schools, libraries, community centres, cultural spaces, health centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity) in accordance with the zoning objective

For clarity, this site is considered to fall under category A) Development on Z15 Lands. This report will demonstrate that the development of this land is fully in accordance with the Z15 zoning for this site and will achieve the stated objective: *“To protect and provide for institutional and community use”* whilst also delivering much needed housing in the area. This is in line with the Dublin City Development Plan Z15 zoning objective within which “Residential” is ‘Open for Consideration’ upon compliance with the above criteria.

For clarity, the remainder of the land, outside of the site the subject of this application, remains in educational use. Therefore Section 14.7.14 B) is not considered to be applicable in this instance.

3. PLANNING POLICY CONTEXT

This majority of the application site is zoned Z15. The area of the existing lake, to the south and east of the site, is zoned Z11 for Waterways protection. No built development is proposed in the area zoned Z11, only landscaping. There is also a small area of land zoned Z1 for Sustainable Residential Neighbourhoods.

It is worth noting however, that the land in question, as set out below, ceased use as Institutional/Educational in 2018 (when the Junior School closed), prior to the adoption of the current Development Plan. As set out in the letter from the Carmelites:

“Terenure College Junior School closed in 2018 and all the Junior School facilities, classrooms, offices and playing pitches are now used by the Secondary School. Also, with the recent development of the All Weather 4G rugby pitch and two All Weather training areas for the school it has become clear to the Carmelites and College Management that this site is surplus to the requirements of the school and the Order. The lake and wooded area were always out of bounds to the students.”

Z11 zoning is set out in section 14.7.11 Waterways Protection with the Objective *“To protect and improve canal, coastal and river amenities”*. In line with this zoning, and the permissible uses of *“Open space, water-based recreational activities”* the proposed development retains this area as open space. As such it is fully in accordance with this land use zoning. While Z1 land allows for residential development and for Open Space provision.

This report will address the requirements of the Z15 Zoning and section 14.7.14 of the site as set out in the Dublin City Development Plan 2022 - 2028. The objective of zoning Z15 is *“Community and Social Infrastructure”*. Residential uses are ‘Open for consideration’ in areas zoned ‘Z15’ subject to being compatible with the overall policies and objectives for the zone.

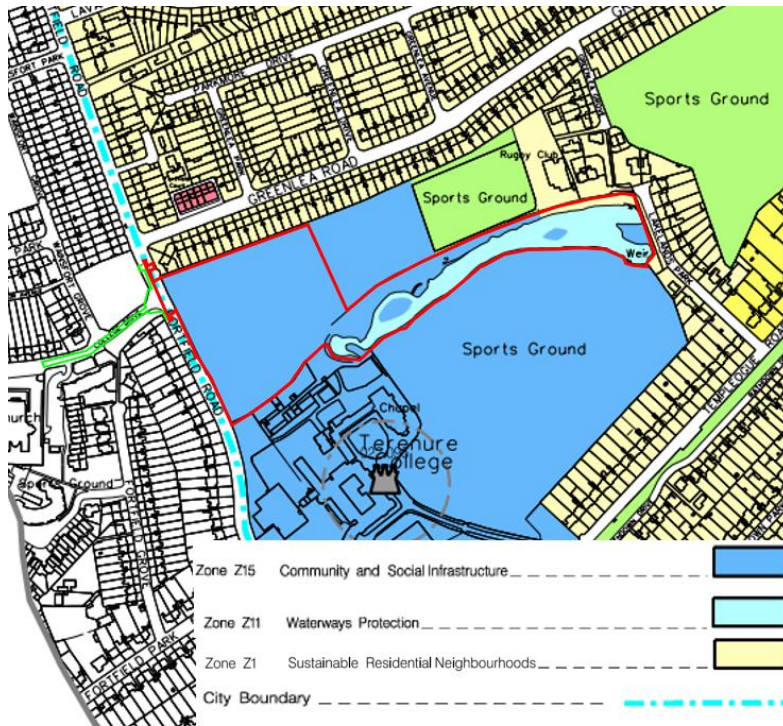


Figure 1 Zoning Map

The Development Plan states under section 14.7.14 that:

“Limited residential/commercial development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the landowner/applicant that the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands. The following criteria must also be adhered to:

- *In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*
- *Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*
- *Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*
- *The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.*
- *In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*
- *In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

For clarity, the above criteria do not apply to residential institution use, including ancillary staff accommodation or assisted living/retirement home. Student accommodation will only be considered in instances where it is related to the primary use on the Z15 lands. Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal.

Masterplan Requirement

In either scenario A or B, it is a requirement that for sites larger than 1ha that a masterplan is provided. The masterplan must set out the vision for the lands and demonstrate that a minimum of 25% of the overall development site/lands is retained for open space and/or community and social facilities. This requirement need not apply if the footprint of existing buildings to be retained on the site exceeds 50% of the total site area.

The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network. Development proposals must incorporate landscape features that contribute to the open character of the lands and ensure that public use, including the provision of sporting and recreational facilities which would be available predominantly for the community, are facilitated.

Where there is an existing sports pitch or sports facility on the Z15 lands subject to redevelopment, commensurate sporting/recreational infrastructure will be required to be provided and retained for community use where appropriate as part of any new development (see also Chapter 10: Green Infrastructure and Recreation, Policy GI49)."

Please note this document should be read in conjunction with the Architectural Design Statement by Urban Agency Architects which provides a Campus Masterplan.

4. SITE LOCATION AND CONTEXT

The proposed development site (c.4.64ha) is a former sports field and school vegetable garden, in the northwest corner of the grounds of Terenure College Senior school. The main part of the site is an open field that was historically used to grow vegetables when Terenure College operated as a boarding school. In 1974 the boarding school closed, and the land was then used as playing pitches associated with the now closed junior school. The use of this area as ancillary sports grounds for the school ceased once the junior school closed in 2018 and the all-weather/4G pitches were developed. Since then, this land has been unused and surplus to the requirements of the Institution as confirmed in the Carmelites Letter attached.

At the eastern end, the site also includes a lake and woodlands that runs to the south of Terenure College Rugby Football Club grounds. On the south side of the lake is a large area of playing fields also in the ownership of the Terenure College. The subject site and the entire lands are under the Trusteeship of the Carmelite Province Order and as such is privately owned at present. It is noted that there are no public rights of way across the land.

The site is free from any protected structures or monuments, and is not located within a Conservation Area or an Architectural Conservation Area. The site is also not within or adjacent to a Special Area of Conservation (SAC) or a Special Protection Area (SPA). There is a recorded monument RMP DU022-095 classified as a castle which is no longer extant, identified in the heart of the existing educational buildings. The castle was replaced by a mansion in the late 17th century and rebuilt again in 1787 and is now the site of Terenure College. The location of the RMP is outside the site for the LRD planning application.

The site is located in an established residential area, characterised by low-medium density housing. To the north are the rear gardens of two storey housing on Gleenlea Road. To the east of the site is Lakelands Park, a residential housing estate. The western portion of the site has extensive frontage along the Fortfield Road to the west with the boundary marked by a rendered wall.

The site is within a ten-minute walking distance to Templeogue and Terenure Village which provides a range of services, public transport options, local amenities and employment opportunities. Overall, it is considered that the site is well located and is in a highly accessible location, well served by public transport, bike and walking facilities providing connection to the employment, commercial, health and education services within the vicinity and wider City.



Figure 2 Site location

5. COMPLIANCE WITH Z15 CRITERIA

The City Development Plan states that under criteria A: Development on Z15 Lands “*Limited residential/commercial development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the landowner/applicant that the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands. The following criteria must also be adhered to:*”:

- i. *the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands.*
- ii. *In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*
- iii. *Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*

- iv. *Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*
- v. *The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.*
- vi. *In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*
- vii. *In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

These are dealt with in turn below.

5.i) The proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/ social/ community use on the lands.

Financial stability

As set out in the enclosed letter from the Carmelites, the retention of the existing education use of the wider landholding is guaranteed as a result of this redevelopment, providing the financial stability and viability for Terenure College to continue into the future.

They confirm that the redevelopment of this site will benefit the school stating:

“The Board of Management and the Carmelite Order recognises the enormous benefit that this proposed development has for the school and the Order. It will allow for a capital injection into Terenure College and secure the College's future viability as a secondary school as well as benefit the ongoing work and ministry of the Carmelite Order in Ireland, Zimbabwe, and other parts of the world.

Development of the site to the north-west of the Terenure College lands will ultimately enhance and secure the continued operation of the school, its playing fields and swimming pool with more than sufficient space to cater for any school expansion. School activities and those of the various groups that use the school grounds can be more than comfortably accommodated on the remaining College lands.”

History of educational use on site and current demand

Terenure College was originally built for residential use by the Deane family, in c. 1830. It subsequently passed to the Shaw family and then the Bourne family until in 1860 Terenure House was changed to educational use as a college. This area was part of the wider demesne of Terenure House and therefore was originally in residential use, associated with the Deane family residence.

Between 1870 and 1890 the school was extended to accommodate 5th and 6th year classrooms, and this expansion of the school continued to include a boarding school. The land the subject of this application consultation request was used as a vegetable garden for Terenure College.

In 1974 the boarding school closed, and this site subsequently was used as playing fields for the former Junior School. The Junior School has also since closed in 2018, due to lack of demand. This land has not been used for educational purposes since then and has been left fallow

As evidenced by the agreed sale of the land and the letter of consent from the Carmelite Province Order, representing Terenure College, since the closure of the junior school in 2018 the application lands have been surplus to requirements.

There is no realistic prospect of these lands coming back into educational use. Furthermore, should the existing school wish to expand in the future, or if an additional school was to be developed by the Department of Education; as demonstrated by the Masterplan created by Urban Agency, there is significant land remaining within Terenure College to accommodate future provision if the need did arise.



Figure 3 Existing Campus

Terenure College is a modern progressive school which provides a six-year secondary (post primary) education. On site there are a wide range of existing buildings accommodating all aspects of education including sports, academia, spirituality, and a canteen. The sale of this land will not impact on the operational viability of these buildings and the continued educational offering on this site. The existing quantum of educational buildings and floor space is meeting the current and ongoing requirements of Terenure College for the number of students served.

Furthermore, as set out in the Carmelites Letter of Consent and Support in Appendix B; *“The Board of Management and the Carmelite Order recognises the enormous benefit that this proposed development has for the school and the Order. It will allow for a capital injection into Terenure College and secure the College's future viability as a secondary school as well as benefit the ongoing work and ministry of the Carmelite Order in Ireland, Zimbabwe, and other parts of the world.*

Development of the site to the north-west of the Terenure College lands will ultimately enhance and secure the continued operation of the school, its playing fields and swimming pool with more than sufficient space to cater for any school expansion. School activities and those of the various groups

that use the school grounds can be more than comfortably accommodated on the remaining College lands."

The total campus, including the subject site, extends to approximately 19.6 hectares of land, of which a total of 82% is currently open space and unbuilt upon. Excluding the LRD application site, which only amounts to 13% of the overall campus site area, there are c.14.83 hectares of land remaining within the Trusteeship of the Carmelite Order for current and future educational purposes.

Given the large landholding retained there is ample space for the educational facilities to be further expanded, if necessary, in the future. This potential for further significant expansion is demonstrated within the Design Statement prepared by Urban Agency which provides a 100-year plan in this regard. This plan demonstrates that the capacity of Terenure Campus could almost triple in size, if necessary, over that time period. This would be achieved by consolidating and strengthening the cluster of buildings along Fortfield Road to the southwest of the site. This could be funded through the redevelopment of the subject site.



Figure 4 Indicative Masterplan

Therefore the sale and redevelopment of this small area, which is less than a quarter of the overall landholding, will not impact on the function of the wider area in educational use. Furthermore, the proceeds will provide financial stability and enhance the operational viability for the continued use of the land in educational use, and enabling the future expansion of the school, should the need arise.

As set out above, the proposed development is physically separate from the other functional areas of the school due to its historic use as a vegetable garden and then more recently as a junior school. This

development of the surplus lands will deliver new public open space, protect and enhance the area around the lake and will ensure the future viability and longevity of the school by providing a new potential population to attend the school.

Furthermore, this proposed development will, as shown in the Campus Masterplan in the Urban Agency Design Statement, in no way compromise the future viability of the school, chapel and will maintain the openness of the remaining site, the associated sports fields and swimming pool, for the use of the school and community groups. In fact, the sale realisation of this surplus land will secure the viability and the retention of the existing functional open space and playing fields, allowing continued investment in these facilities for the future.

5.ii) In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.

Expansion of Terenure College

Urban Agency have provided a Campus Masterplan within the Architects Design Statement. The Masterplan provides a vision for the next 50 years and 100 years demonstrating that there is ample space and opportunity for expansion. The school could nearly triple in size while still retaining 6 no. playing pitches on site to the north and north-east of the existing buildings. The open nature of these pitches ensures that 65% of the remaining land holding would be open/recreational space which is in excess of the minimum of 25% required in the development despite the expansion of the campus.

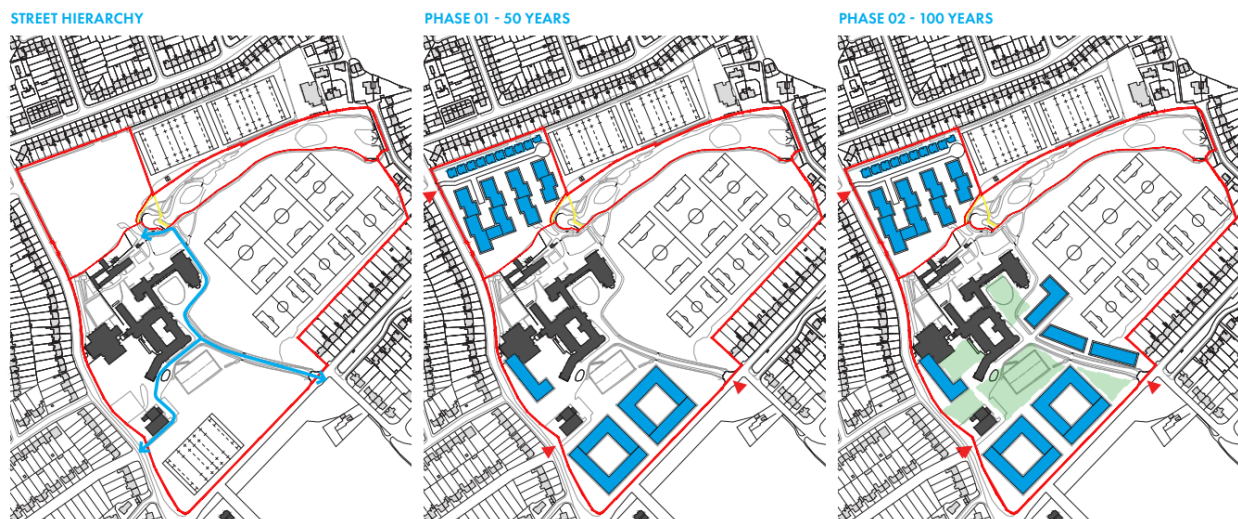


Figure 5 Design Strategy

New schools under a different patronage

Furthermore, given the area of land remaining within Terenure College control, a further 2 additional post primary schools of 1,000 pupils on this site could be accommodated, or a primary and post primary, or a combination. These could potentially be provided by the Department of Education and under a different patronage should the need arise. The future potential for additional educational facilities, as well as the expansion of the existing school, is confirmed by the enclosed letter from the Carmelites.

Table 1 of the Identification and Suitability Assessment of Sites for Post Primary Schools produced by the DOE identifies the quantum of space required for schools of varying sizes. This Technical Guidance produced by the Department of Education and Skills Planning and Building Unit identifies that a 1,000 pupil school in a 2 storey development can be provided on 4.57 ha. Therefore, the retained site could facilitate additional schools within its landholding without any need for reduction in standards as provided for under 1.2a of the same document.

Table 1 - School Site Area Analysis

| School Site Area Analysis | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------|-------------|
| | Size of School (Pupil Number) | | |
| Site Components (all figures in m ²) | 500 | 750 | 1000 |
| School Footprint Only (Two Storey Building) ¹ | 3594 | 5556 | 7517 |
| Parking ² | 865 | 1298 | 1730 |
| Traffic circulation (plus set down and pick up) | 2000 | 3000 | 4000 |
| Paths, Cycle ways and Paving | 1725 | 2588 | 3450 |
| Bicycle Parking | 68 | 102 | 136 |
| Covered Storage and Yard | 405 | 608 | 810 |
| Ballcourts ³ | 2550 | 2550 | 3060 |
| Playing Pitches ⁴ | 10900 | 10900 | 10900 |
| Waste Treatment Plant ⁵ | 0 | 0 | 0 |
| Future Expansion ⁶ | 1089 | 1684 | 2278 |
| Sub Total | 23196 | 28284 | 33881 |
| Separation Areas (35%) ⁷ | 8118 | 9899 | 11858 |
| | | | |
| Totals in sq m | 31314 | 38183 | 45740 |
| Acres | 7.74 | 9.44 | 11.30 |
| Recommended Site Area in Hectares for a 2 Storey School Building | 3.13 | 3.82 | 4.57 |
| <p>Note 1: This footprint is based upon a two storey building design. Should a three storey design be permissible, the building footprint size should be reduced by a factor of 10%. Footprint size may also be affected by the inclusion of a Special Needs Unit (SNU). Typically, an SNU will be approximately 500m² in size and located on the ground floor.</p> <p>Note 2: Due to the scarcity of land in urban areas it is not always possible to achieve the ideal site size for school buildings. Where some of the elements required for a school site can be provided outside the designated site area (e.g. traffic management, parking, playing fields, etc.), where it is possible to provide multi-storey (above two storey) buildings and where separation areas can be reduced due to the nature of permitted development on and adjacent to the site, smaller sites can be considered.</p> <p>The DoES is in the process of developing an urban site area calculator based on analysis carried out on built schools and proposed new school sites to inform urban school site sizes. Pending its completion, in higher density urban developments where the optimum site area set out above cannot be identified the Planning and Building Unit should be consulted at the earliest possible stage.</p> <p>Constraints in site sizes in urban areas mean that the full suite of external accommodation may not be provided in all cases. In such circumstances priority should be given to the provision of accommodation and services specific to the pedagogical requirements of the school. In many cases this will be in line with Local Authorities' own development policies, e.g. encouraging sustainable transport methods thus reducing parking and set down requirements.</p> <p>Note 3: The figure allocated to parking is based on previous best practice. An area of 200m² represents 10 standard parking spaces arranged in two rows of 5 plus a 6m wide access road. Should the relevant local authority require additional or reduced parking, an adjustment can be made on the basis of 12.5m² per standard parking space. The relevant Development Plan should be consulted for guidance on appropriate parking provision.</p> | | | |

Figure 6 School Site Area Analysis. Source: Department of Education and Skills

Therefore, should it be determined in the future that additional educational space and/or schools are required, there is more than ample space to deliver same within the remaining c. 14.7ha of the campus while still maintaining sufficient open space within the lands to serve pupils. The use of the application site for residential on the residual area to the north-west of the campus will not preclude this.

Recently granted schools as comparison sites

Recent planning permissions for school sites within the Greater Dublin area have also been assessed, as indicated in the table below. It is clear from this assessment that the remaining land within the campus is sufficient to provide for any combination of school campus, be it primary only, post primary or one of each, while also still enabling the retention of appropriate levels of open space. These examples and their site layout plans are provided in Appendix A.

| Recently granted Schools | Planning Reference no. | School Capacity | Area (ha) |
|-------------------------------------------------------------------------------|------------------------|-----------------|-----------|
| Site at Grange Community College, Grange Abbey Road, Dublin 13 | DCC 3355/23 | 600 | 2.6 |
| Belmayne, Parkside, Dublin 13 | DCC 2600/20 | 1000 | 2.03 |
| Pobalscoil Rosmini, Grace Park Road, Drumcondra, Dublin 9 | DCC 2172/17 | 350 | 1.4 |
| Porterstown adjacent to Luttrellstown Community College, Clonsilla, Dublin 15 | FCC FW22A/0288 | 1000 | 6.5 |
| Castle Street and Bishop Street, Cherrywood, Dublin 18 | DZ21A/1038 | 1000 | 1.85 |
| Lands adjacent to Feltrim Road, Drinan, Swords, Co Dublin | F18A/0601 | 1000 | 2.03 |

Table 1 comparing land area of recently approved school planning applications in the greater Dublin area

Existing schools

Furthermore, when compared to other existing similar schools within the Dublin urban area, the retained land represents a very large site. Please refer to table 2 below. Despite the reduction in the overall land holding, Terenure College will continue to have the second largest land holding of these schools, with only Blackrock College exceeding it. Furthermore, it is nearly two and half times that of the next largest land holder, Gonzaga College, which demonstrates that the remaining c.15ha can readily accommodate at least two further schools on the site.

| Institution | Enrolment | Area |
|-----------------------|-----------|---------|
| Terenure College | 770 | 15ha |
| Gonzaga College | 550 | 6.5ha |
| St. Michael's College | 655 | 4.45ha |
| Blackrock College | 1,018 | 21.15ha |
| St. Mary's College | 750 | 1.85ha |

Table 2 comparing land area per school at similar secondary schools in the Dublin

Identified need by the Department of Education

Notwithstanding this significant development potential of Terenure College, we also note, as per the Department of Education Report: *"Projections of Fulltime Enrolment 2021 – 2040"* (DOE, November 2021), that future levels of Primary and Second Level needs are unlikely to result in Terenure College needing to extend significantly over the coming decades or for the need for a new school to be delivered on this site.

Section 4.1 highlights that *"Enrolments in primary schools in Ireland in 2020 stood at 561,411 down by almost 6,000 on 2019 (567,716). Enrolments are now projected to fall over the coming years under all scenarios, and under the M1F2 scenario will reach a low point of 440,551 by 2033. This is 120,860 lower than today's figure. Enrolments will rise again thereafter and are projected to stand at 474,888 by 2040, a rise of some 34,300 over the seven years 2033 to 2040."*

Even following the projected increase after 2033, the high of 2040 will be 474,888, which is 92,828 pupils less than the 2019 figures. Therefore, the need for the junior school to reopen in the future, or the expansion of the secondary school, is not a likely prospect given the fall and continued forecast decrease in pupil numbers in Ireland.

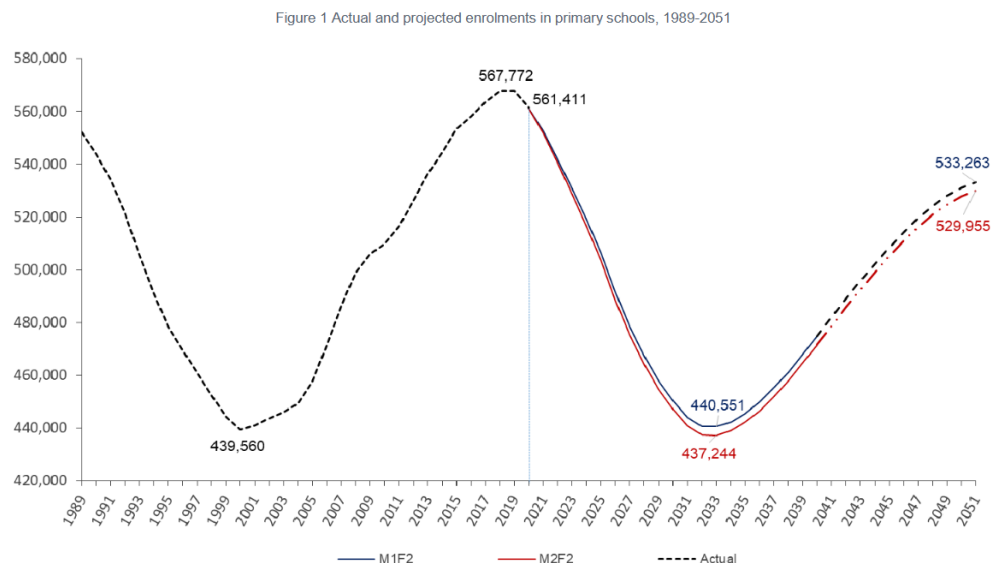


Figure 7 Actual and Projected Enrolments in Primary Schools

In terms of the post primary school pupil projections, it is expected to peak in 2026 with a continuous fall in the number of students, thereafter, falling to 2033.

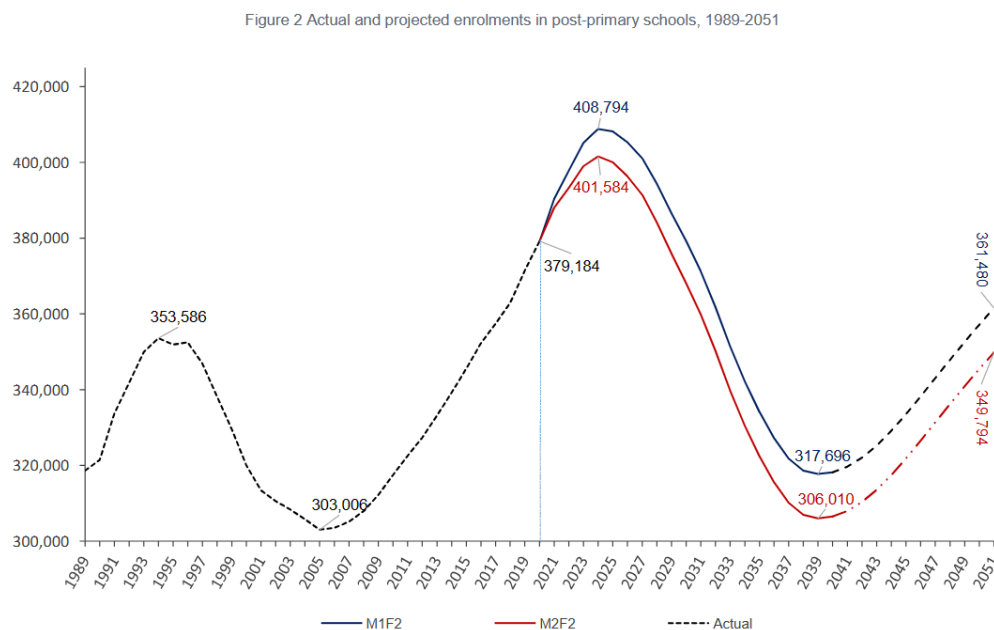


Figure 8 Actual and Projected enrolments in Post Primary Schools

Section 5 of the DOE report further states that: “There was very little difference between the projected and the actual figure in 2020 by M2F2, i.e., an under-projection of 364 pupils at primary level and of 1,075 pupils at second level. At primary level this difference is mainly due to the combination of two factors: the inward migration of 0–4-year-olds was higher than projected, while the number of children participating in the ECCE scheme increased leading to a fall in the enrolment rate of 4 year olds in school (down from 0.46 in 2018 to 0.44 in 2019) [4]. As a result, the actual enrolment figures were slightly higher compared to the projected ones. The model has been updated accordingly.”

Whether these projections are accurate or whether there is a significant increase in demand for either primary or secondary schools, as indicated in the submitted Masterplan, there is ample room for the remaining campus to develop and provide, for example, an additional primary school along with an extension to post primary school offering should future demand arise.

5.iii) Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.

Terenure College has a variety of building types which range in height, footprints and massing. The primary use of this land, for educational purposes, will remain on c.77% of the land. Only 13% of the site is proposed for the residential element of the development. The remaining 10% is Z11 zoned lands and will be landscaped, providing public access to this area along with the new public park because of this residential proposal. It is also noted that of the 13% of the overall landholding proposed for residential use, some 25% of the proposed development site will be delivered as public open space.

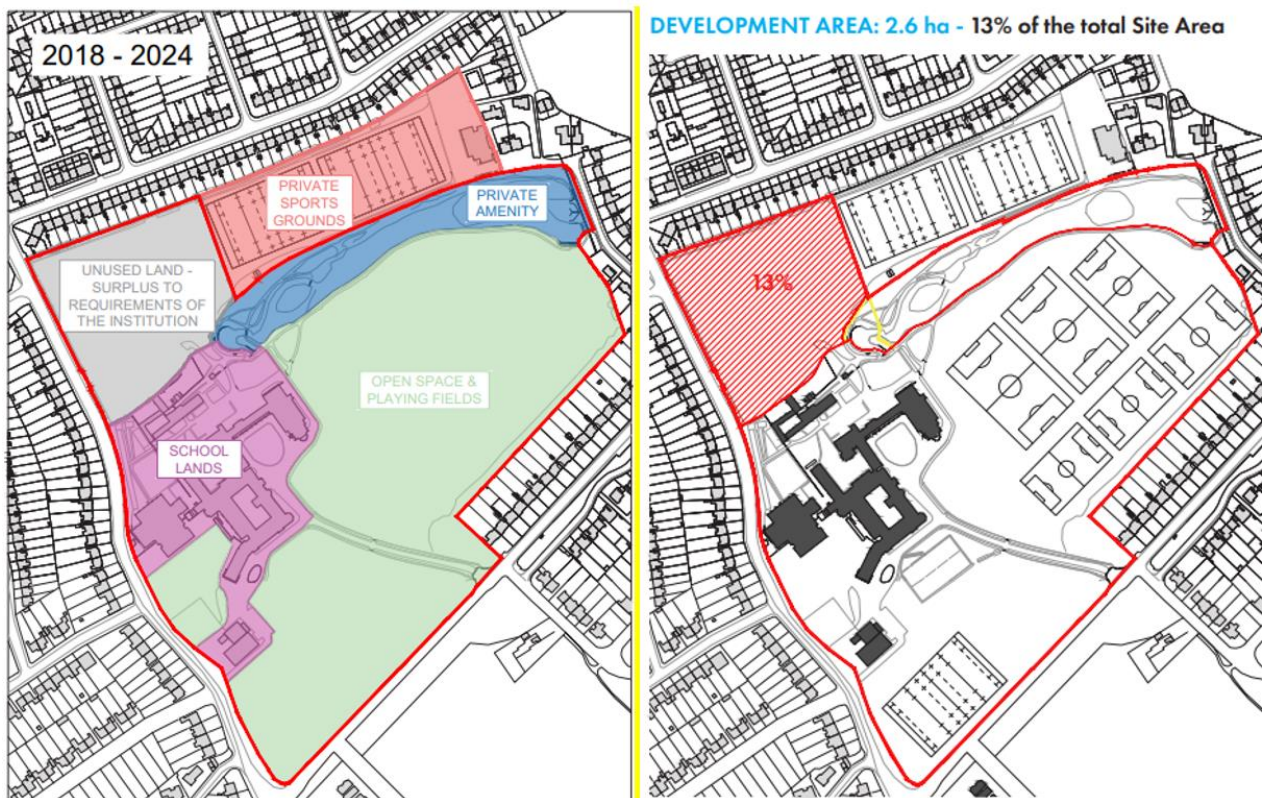


Figure 9 Campus Masterplan and Development Area

The layout of the proposed development is to contain all new buildings to the north-western side of the site, to the north of the existing Terenure College. The two and three storey houses are located to the north of the site adjacent to the existing two storey residential. The apartments, form a transition from the more domestic scale to the larger existing school buildings. As demonstrated by the verified views (no.s 5, 6, 7, 8, and 11 all of which show the proposed development and Terenure College) submitted with this application, the proposed buildings remain subservient visually to the existing educational buildings. Therefore, it is considered that the scale of the proposed development is subservient to the educational use both in terms of land take and visually.

VIEW 05 - PROPOSED



VIEW 06 - PROPOSED



VIEW 07 - PROPOSED



VIEW 08 - PROPOSED



VIEW 11 - PROPOSED



Therefore, the scale of the proposed development, in terms of land take is smaller than that of the educational use retained on the site, and as such, is subservient to the primary use of the site. Furthermore, the buildings have been sensitively located, with public open space between the proposed tallest buildings and the existing buildings to the south creating a buffer between the two areas. Therefore, the graduated height and siting of the open space provide an appropriate transition between the smaller domestic scale buildings to the north and the institutional buildings to the south, while remaining visually subservient to Terenure College when viewed from the wider area. This provides an appropriate reflection of the existing built development within the immediate area of the subject site and is proportionate to same.

5.iv) Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.

The Carmelite Order and Terenure College have confirmed that the land is surplus to requirements. This is also evidenced by the agreement to sell this land. The Order and the Board of Management have also confirmed that not only can all of the existing school facilities and activities but also those of the various groups that use the school facilities can and will continue to be accommodated within the remainder of the site.

The Carmelite Order have confirmed that *“the entirety of this land is surplus to the requirements of the Carmelite Order and Terenure College. We also confirm that there is more than sufficient capacity on the balance of our landholdings to accommodate any expansion or development of the existing school facilities and institutional uses at Terenure College over the next 100 years and beyond.”*

The Carmelite Order has also consulted with the Department of Education since the previous decision on this site and the Department of Education has confirmed to the Carmelite Order that the subject site for this proposed residential development is not necessary for additional school provision in the future.

Please see Appendix B which includes a letter from the Carmelites Order which states that they “*are in active dialogue with the Department of Education regarding accommodating their potential future educational requirement in the south Dublin City area within the significant landholding of Terenure College.*”

Furthermore it is noted that the Department, as a prescribed authority under Sections 11, 12 and 13 of the Planning & Development Act, 2000 (as amended) can also be notified by the planning authority with regards to this matter.

5.v) The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.

Site itself

The site is currently a green field site with a lake and woodlands to the east. It is bounded on the west by a high wall, to the north by rear garden walls and hedges, to the west by a fence to the Terenure Rugby Club and to the south by existing buildings and a car park. It is only accessible via Terenure College and therefore, while there is significant areas of open space, none of it is open to the public. The proposed development will open the site to the Fortfield Road for the first time, creating visual and physical linkages to this road. The impact of this will not only create a new public open space for the wider area, it will also contribute to changing the character of Fortfield Road, creating a new open character to this area.

The layout of the buildings, and the gaps between the buildings also create a sense of space within the proposed development. While the provision of all built development, along the northern side of the site, leaving the southern side free from built development, will maintain the open character of the site. All of these spaces are designed to a high quality, ensuring that the proposed open space does not just achieve a numeric target, but also creates a landscaped environment that is pleasurable to be in, and move through, but which is overlooked and allows the users of these areas to feel safe. The quality of the landscape design builds on the existing features and enhances the open nature and characteristics of the site.



There are two zonings on the site, Z11 and Z15. Between these two areas there is a total of 26,131.75 sqm of public open space and community and cultural space provided. In addition to that, there is a further 4,492.2sqm of communal open space provided between the apartment blocks. This equates to 30,412.67sqm of Open Space across the entire site, or 65% of the total site area.



Figure 10 Total Public Open Space Provision

It is also worth noting that none of the Z11 is proposed for built development. Only enhanced planting and creating an ecological corridor is proposed in this location. This area equates to 11,874sqm or c. 26% of the overall site area.

When all the Z15 land which is developed into a public park, along with the enhancement of the Z11 Land there will be c.56% of the site delivered as Public Open Space.

It is worth noting that the areas of open space as defined by the Z15 have also been defined as accessible and inaccessible. There is also Z15 lands within the lake, however, this is considered inaccessible and has therefore been discounted from the calculations of public open space. This area is, however, an important feature of the landscape setting of the site.



Figure 11 Open Space Provision with Zoning

Of the area zoned Z15, 14,257.75sqm of the site is public open space. Of the proposed net developable area there is 6,989.35sqm of public open space proposed while the requirement is for 6,6000sqm based on the net site area at 2.64ha. Therefore, at 26.5% is in excess of 25% identified requirement for this land to be provided as public open space. This does not include the proposed Community and Cultural Space, the Z11 lands, or the Communal Open Space between the buildings. The public open space is located between the proposed development and Terenure College ensuring it is to the south of the site and as such will benefit from excellent access to daylight and sunlight.

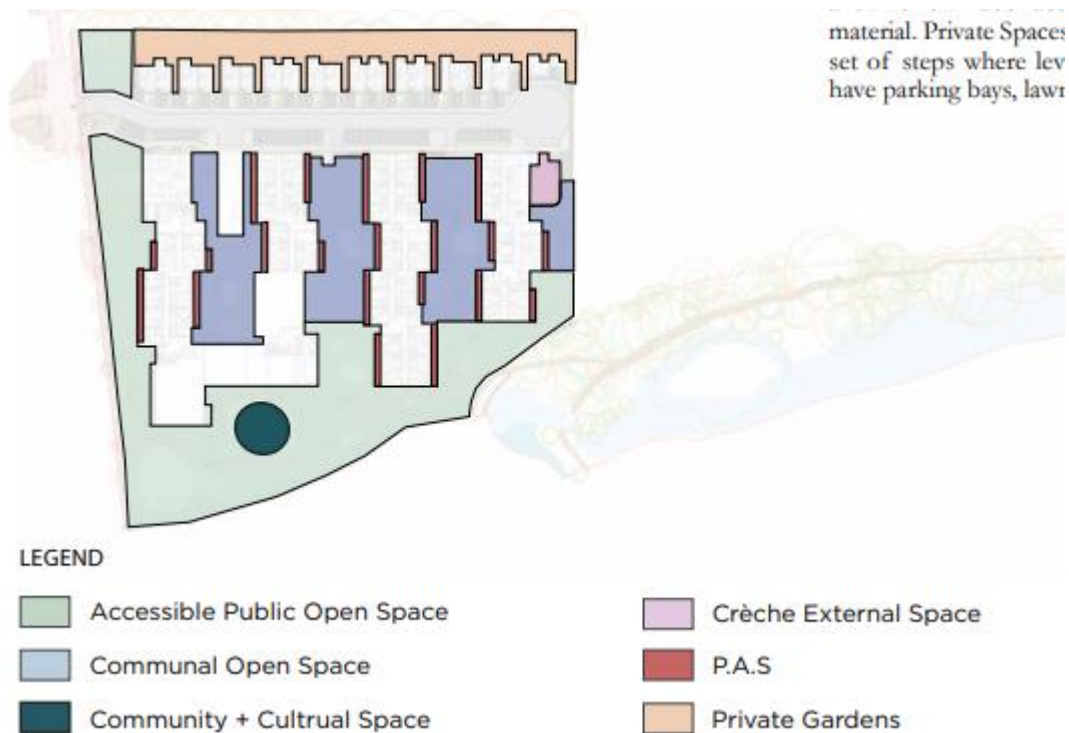


Figure 12 Public, Communal and Private Open Space Provision

| Open space calculation | Area | Percentage of total site |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|---------------------------------------|
| Total site area* | 46,400sqm | 100% |
| Area of all open space (communal, community and cultural and public open space) | 30,412.67sqm | 65% |
| Total public open space (Z11 + Z15 Lands) | 26,131.75sqm | 56% |
| Z11 Lands Public Open Space | 11,874sqm | 26% |
| Z15 Lands Public Open Space | 14,257.75sqm | 31% |
| Net Site Area (Excludes Z11 area (existing lake) and adjoining landscaped area around the lake (Z15) and small Z1 area at the eastern end of the lake. Net site area also excludes any works on Fortfield Road.) | 26,400sqm | 57% |
| Public Open Space based on Net Site Area/ Developable Area | 6,989.35sqm (Requirement for 6,600sqm) | 26.5% (Requirement for 25%) |
| Communal open space based on Net Site Area/ Developable Area Communal open space, in line with section 15.9.8 is “ <i>open space provision in addition to any private or public open space requirements</i> ” | 4,492.2sqm (Requirement for 1,609sqm) | 17% |
| Community and Cultural Space | 199sqm | 1% |
| Total communal and public open space within Developable/ Net Site Area (as a % of the net area) | 11,481.55sqm (6989.35sqm + 4492.2sqm) | 44% |

*When SDCC Application lands are considered the total site area is 4.77ha but this land is outside the Z15 or Z11 Lands.

Proposed site layout and incorporation of features

As demonstrated above, the layout of the proposed development is to contain all new buildings to the north-western side of the site, to the north of the existing Terenure College. The two and three

storey houses are located to the north of the site adjacent to the existing two storey residential. While the large buildings, both in height and in footprint are to the south of the site. This transition and scale reflects the larger buildings of Terenure College located to the south of the application site.

The proposal also proposes to enhance the lake and surrounding area and woodlands, bringing these into public use and access for the first time, adding significantly to the open character of the lands. This will create an attractive area for both wildlife and the local human community, creating a safe location for both. This area is located to the east of the developable area and is an additional, significant planning gain that is not counted in the public open space to be delivered for the purposes of the Z15 lands.

Another key driver of the development was to enable east west connections for the wider community, while retaining existing connections to the school to the south and rugby club to the east. This will benefit the wider community by providing additional permeability for the existing community within the area.

All of the houses are proposed to have their own private rear gardens of 70sqm or more and parking to the front. This is in line with Section 15.11.3 of the Development Plan which requires “*Generally, up to 60-70sqm pf rear garden area is considered sufficient for houses in the city*”, The apartments are laid out in fingers running in a north-south direction ensuring that the communal spaces get good daylight and sunlight, while each of the apartments will face either east or west, again ensuring excellent access to sunlight and daylight in each apartment and all apartments have private open space in accordance with the Apartment Guideline requirements of between 4sqm and 9sqm depending on the apartment size. Please see the Housing Quality Assessment by Urban Agency Architects for further details.

Locating all of the proposed development to the north-western side of Terenure College, close to the existing buildings of Terenure College, allows for the retention of open space to the east and provides a visual and physical connection between the open spaces provided by the playing fields to the north and south of the site. This will preserve and enhance the open character of the overall area.

Entire Terenure College Campus

As demonstrated in the Architects Design Statement in the 100 year Campus Masterplan, Terenure College could nearly triple in size, delivering three times the number of student places while retaining 65%, or 12.8ha of the total site area as Open Space. This is far in excess of the overall 25% requirement of the Development Plan for Z15.

However, it is worth noting that none of this land would be public open space, it would be retained in private ownership of the school. This proposed development is the only development currently proposing to provide any public open space within Terenure College Lands.



Figure 13 Site Masterplans

The open space existing on the site, post the proposed development, as well as the future potential development on the site, will retain the extensive school playing fields and open space to the east of the Terenure College Buildings, to the south of the lake. These comprise of rugby fields, football pitches and multi-use sports areas. There is also a large area of open space at the southern portion of the institutional lands which provides tennis courts and a sports pitch. This area to the south could accommodate any future built development. However, this is not expected to be required in the short or long term given the Department of Education's forecasts and the experience of Terenure College to date.

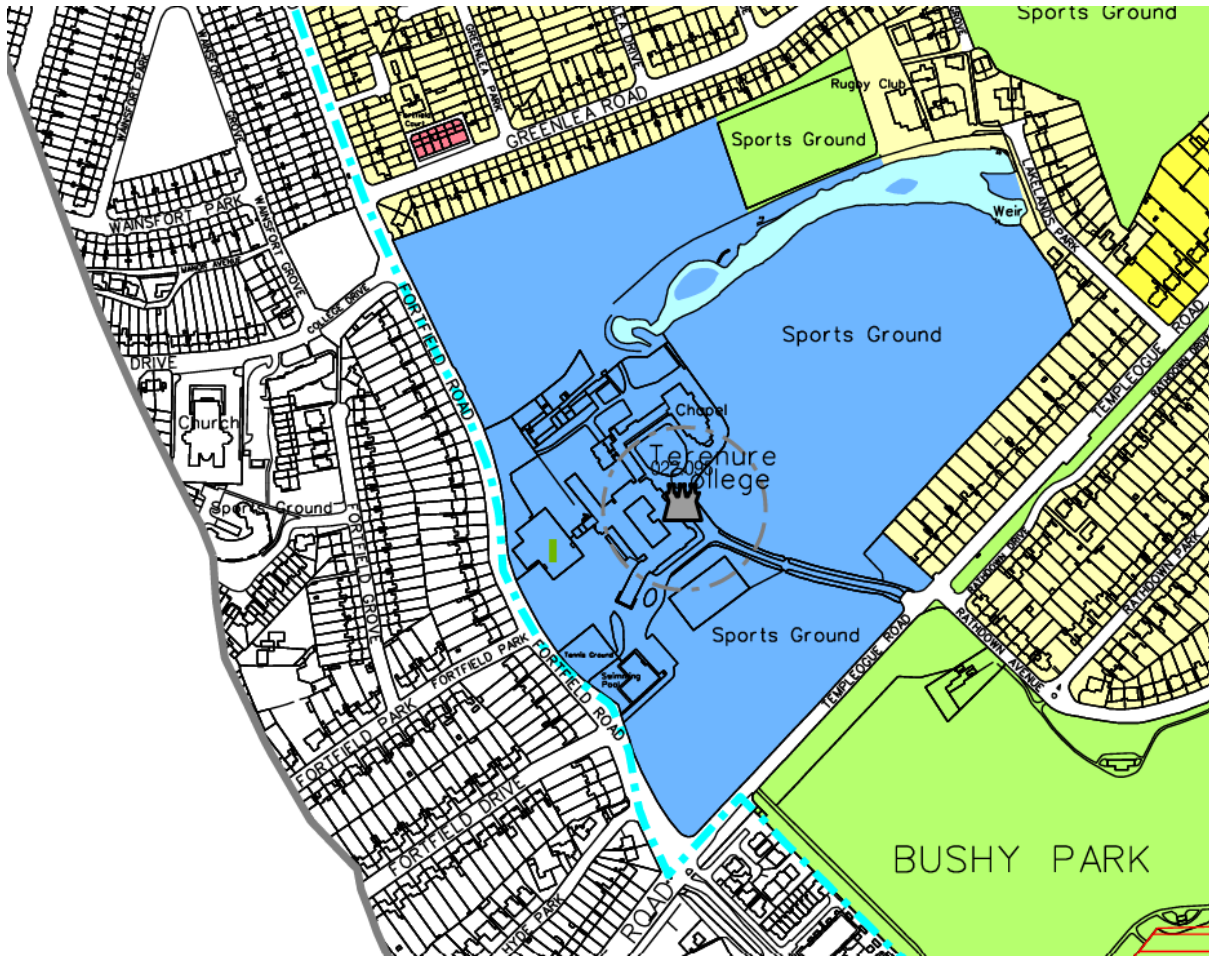


Figure 14 Terenure College Lands Subject Site

Linkages to open space and green infrastructure

As can be seen from Google Maps and the extract from NMP Landscape Design Statement the site is located within a suburban area which has a high level of access to public parks and sports grounds along with smaller residential greens. Currently, the lands owned by Terenure College are privately owned and are not accessible to the public.

This proposal will provide a new public park and access to the attractive lake area that is currently part of Terenure College. This will expand the existing green network within the area. It will also retain any existing gates between the application site and Terenure College and also the Rugby Club providing further permeability through the site and within the surrounding area.



Figure 15 Google Maps extract



Figure 16 Green Spaces surrounding the subject site

Furthermore, the existing woodland areas will all be enhanced with new planting and features, further strengthening the green network, enhancing the opportunities for fauna, and also providing an attractive location for local residents to use and enjoy. It is considered that the provision of the lake and wooded area as formal open space, which provides new linkages to the east and west as well as

to the north and south, is a significant planning gain. It is also noted that this is fully compliant with Development Plan policies by developing this linear park, beside this existing waterway, which provides linkages to the wider area and creates further green chains within the city.

The proposal, through the retention of the existing gates into the school and rugby pitches will maintain these linkages allowing access for those who want to use the school or sports facilities in the vicinity within their opening hours.

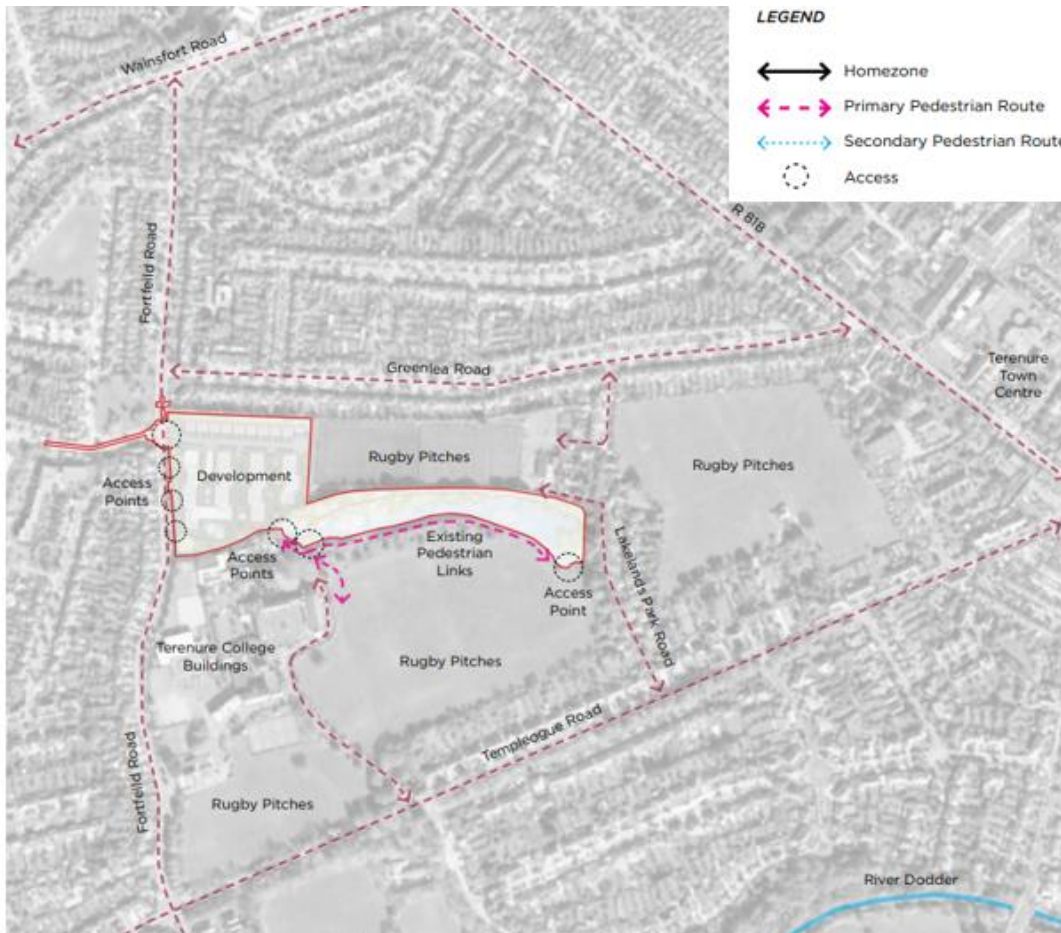


Figure 17 Circulation routes surrounding the subject site

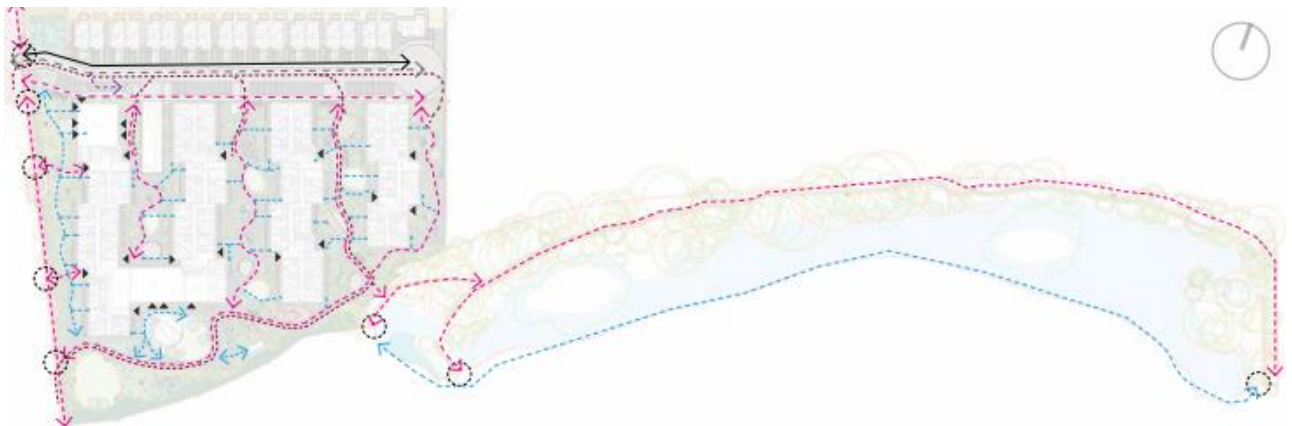


Figure 18 Circulation routes within the subject site

5.vi) In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.

This Statement of Compliance is considered to be an appropriate report demonstrating the intention that the remaining lands continue to be used for Educational Use.

This is further demonstrated by the Carmelites Order retaining c. 77% of the land. Only 23% of the land is proposed for sale. The sale of this land will enable reinvestment into Terenure College.

The money acquired through the sale of this site will be reinvested into the school to ensure its long-term future. This is further ensured by this zoning policy within the Development Plan.

A draft legal agreement can be provided subject to the final grant of planning permission. This can be dealt with by way of condition.

5.vii) In all cases the applicant shall be the landowner or have a letter of consent from the landowner. Please see below the Letter from the Carmelites in Appendix B, which, on page 3 confirms consent to the lodgement of this planning application.

6. CONCLUSION

This report has addressed, in line with the Z15 zoning, the following key elements:

- 1. the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands.*
- 2. In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*
- 3. Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*
- 4. Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*
- 5. The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.*
- 6. In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*
- 7. In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

The Compliance Statement has demonstrated that the development of this land is fully in accordance with the Z15 zoning for this land and will achieve the stated objective *“To protect and provide for institutional and community use”* while delivering much needed houses in this area. This is in line with the Development Plan within which Residential is ‘Open for Consideration’ upon compliance with the above criteria.

It will also deliver a well-connected city, expansion of the green network through the new public open spaces and will enable the financial viability of Terenure College into the long term future, as well as the potential expansion of same should the need arise. The application site is surplus to the requirements of Terenure College and the Order of the Carmelites.

Furthermore, not only will this development site deliver 25% of public open space within the Net Developable Area, it will also deliver the area around the lake, resulting in a total of 56% of the overall 4.64 ha coming forward as public open space for the first time in the history of this land.

There is also ample open space on the balance of the Z15 lands (c. 70% of the remaining lands) which will be used and maintained by Terenure College as part of the operation of the secondary school.

As demonstrated, the proposed development will in no way compromise or restrict the ongoing operation of the Institutional Land or the delivery of an additional school under a separate patronage.

Nor will it prevent the future expansion of the institutional uses or facilities, as Terenure College could nearly triple in size and there would still remain c. 65% open space to the east of the college buildings. This is in excess of the area required to cater for all existing school needs, as well as any practically conceivable future needs.

The proposed development will secure Terenure College’s future financial viability as a secondary school (through sale realisation). The school activities and those of the groups that use the school site can be comfortably accommodated on the remaining college lands. While the development will deliver significant planning gains including:

- New housing, that is needed in this area.
- New public open space.
- Enhanced biodiversity corridors.
- Increased permeability through the site and into the wider area.
- Improved road infrastructure creating safer crossing points and road layouts.

We would therefore respectfully suggest that this development is fully in accordance with the development plan requirements, and particularly those requirements of the Z15 and Z11 lands.

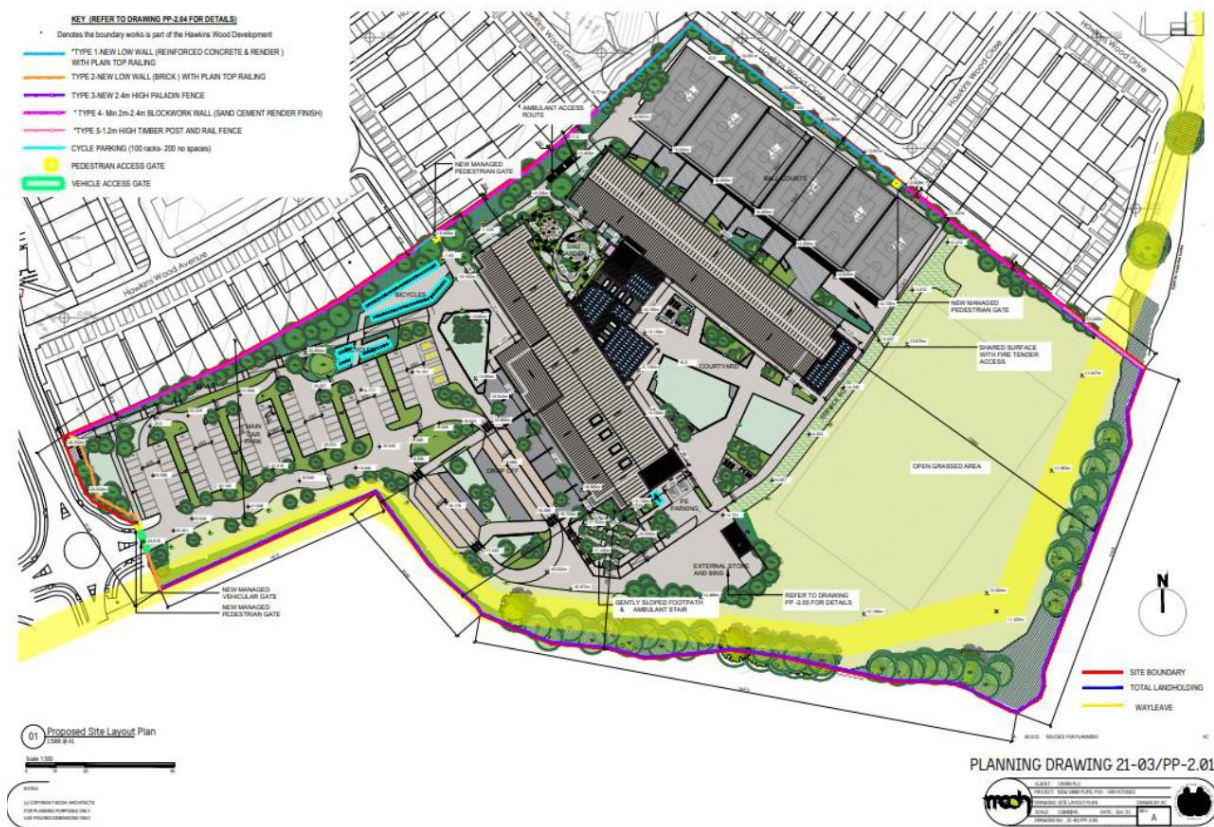
APPENDIX A – SCHOOLS RECENTLY GRANTED PLANNING PERMISSION

School Location: Glenheron, Greystones, Co. Wicklow

Reg. Ref.: WCC 22/168

Date Granted: 13/04/2022

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 4.6ha | 1000 | 46 sqm |



Date Granted: 21/06/2023

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 2.4 ha | 1000 | 24 sqm |



School Location: Site at Grange Community College, Grange Abbey Road

Reg. Ref.: DCC 3355/23

Date Granted: 11/12/2023

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 2.6 ha | 600 | 43 sqm |



School Location: Belmayne, Parkside

Reg. Ref.: DCC 2600/20

Date Granted: 08/11/2022

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 2.03 | 1000 | 20.3 sqm |



School Location: Pobalscoil Rosmini, Grace Park Road, Drumcondra, Dublin 9

Reg. Ref.: DCC 2172/17

Date Granted: 16/08/2017.

Extension of duration: 04/08/2023

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 1.4 ha | 350 | 40 sqm |



Date Granted: 05/09/2023

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 6.5 ha | 1000 | 65 sqm |

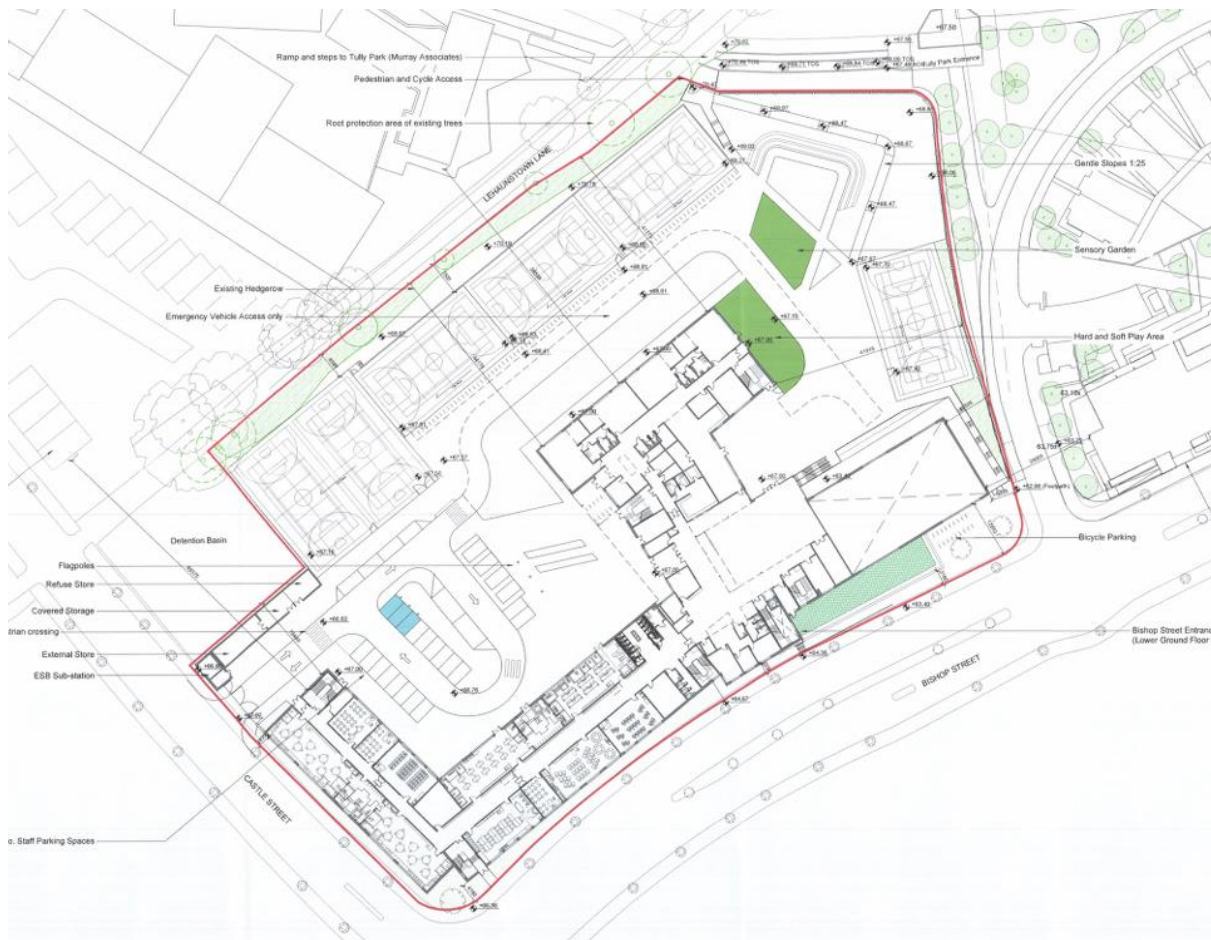


School Location: Castle Street and Bishop Street, Cherrywood

Reg. Ref.: DZ21A/1038)

Date Granted: 08/11/2022

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 1.85 | 1000 | 18.5 sqm |



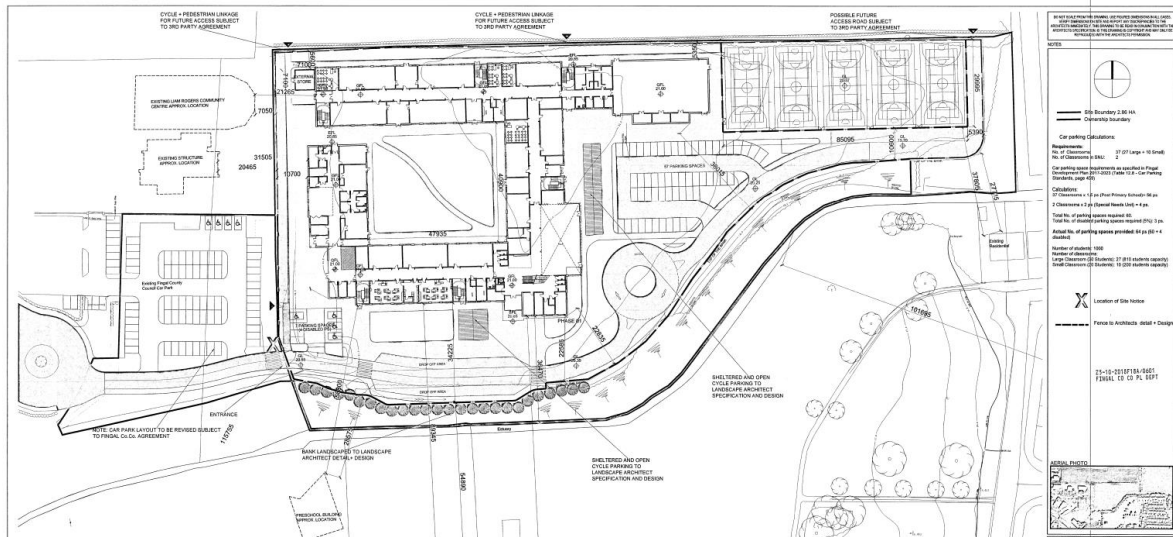
School Location: Lands adjacent to Feltrim Road, Drinan, Swords, Co Dublin

Reg. Ref.: F18A/0601

Date Granted: 23/01/2019

Extension of Duration: 27/11/2023

| Area (ha) | No. of Pupils | sqm / Pupil |
|-----------|---------------|-------------|
| 2.03 | 1000 | 20.3 sqm |



APPENDIX B – LETTER OF CONSENT & SUPPORT FROM THE CARMELITES



Provincial Office,
Gort Muire,
Ballinteer,
Dublin 16,
D16 EI67

Tel: 01 298 4014
Fax: 01 298 7221
Email: provincial@gortmuire.com
Web: carmelites.ie
Charity no: CHY 5894

Planning Department
Civic Offices
Wood Quay
Dublin 8
D08 RF3F

Wednesday 18 December 2024

Re. Lands at Terenure College, Dublin 6W

To Whom it may concern,

We write with respect to the lands adjacent to Terenure College (the 2.65 ha greenfield site at the north-western corner of Terenure College at the junction of Fortfield Road/Greenlea Road, and the linked 1.91 ha wooded area, including private lake), and confirm that the entirety of this land is surplus to the requirements of the Carmelite Order and Terenure College. We also confirm that there is more than sufficient capacity on the balance of our landholdings to accommodate any expansion or development of the existing school facilities and institutional uses at Terenure College over the next 100 years and beyond.

In this regard we confirm that we are in active dialogue with the Department of Education regarding accommodating their potential future educational requirement in the south Dublin City area within the significant landholding of Terenure College. It is likely that these discussions will conclude in the short term.

The greenfield site in question was previously used as playing pitches. Terenure College Junior School closed in 2018 and all the Junior School facilities, classrooms, offices and playing pitches are now used by the Secondary School. Also, with the recent development of the All Weather 4G rugby pitch and two All Weather training areas for the school it has become clear to the Carmelites and College Management that this site is surplus to the requirements of the school and the Order. The lake and wooded area were always out of bounds to the students.

I am filled with Zeal for the Lord

The Board of Management and the Carmelite Order recognises the enormous benefit that this proposed development has for the school and the Order. It will allow for a capital injection into Terenure College and secure the College's future viability as a secondary school as well as benefit the ongoing work and ministry of the Carmelite Order in Ireland, Zimbabwe, and other parts of the world.

Development of the site to the north-west of the Terenure College lands will ultimately enhance and secure the continued operation of the school, its playing fields and swimming pool with more than sufficient space to cater for any school expansion. School activities and those of the various groups that use the school grounds can be more than comfortably accommodated on the remaining College lands.

The Department of Education recommends a site area of 3.82ha for a school of 750 pupils which is relevant for schools of two storeys which is the case with Terenure College (see Identification and Suitability Assessment of Sites for Post Primary Schools, 2019, Technical Guidance Document). The Guidance also allows for school site areas to be reduced in urban areas and separation distances reduced having regard to sustainable transport options. Terenure College site, at 19.6ha, is of a size significantly more than the area required to cater for existing and future school needs.

Terenure College is attended by 735 pupils on a site with an area of approximately 19.6ha. By contrast, Gonzaga College in Milltown has a site area of approximately 6.5ha and pupil numbers of approximately 550. St Michael's, off Ailesbury Road, has student numbers of around 655 on a site of just 4.45ha. Blackrock College has a site area of 22.7ha with 1,018 students but it also has a primary school in addition to the secondary school on the site.

The development site area, at 2.6ha and with excess of 25% public open space, would not impact on the operation of the school. The remaining Institutional land, at 15.0ha, would be vastly more than that required for the size of the school and associated uses. We confirm that the school facilities and activities, including activities of the various groups that use the school facilities, can be accommodated with ease within the remainder of the site, and that the subject lands are no longer required by the Order for the purposes of its functions and mission.

We confirm our consent to the making of the Large Residential Development (LRD) planning application by 1 Celbridge West Land Limited in so far as it relates to lands under our control at Terenure College, Dublin 6. We have been provided with details of the proposed development and look forward to seeing these lands developed.

Yours faithfully,



Fr. Simon Nolan, O. Carm,
Provincial of the Irish Province of Carmelites