## An Roinn Oideachais Department of Education



Clonmel Local Area Plan, Planning Department, Tipperary County Council, Civic Offices, Emmet Street, Clonmel, Co Tipperary E91 N512

08th September 2023

Re: Draft Clonmel Local Area Plan 2024-2030

Dear Sir/Madam.

I wish to acknowledge receipt of notification of the above draft LAP. The Department of Education has examined the contents therein and would like to make the following submission.

In the context of future population trends and their potential impact on school place requirements, the Department notes that this draft LAP refers to the population growth identified for Clonmel in the recent draft CDP 2022-2028. The Department notes that the population scenario envisaged for Co Tipperary is the high NPF target of 184,000 people by 2031. Within that scenario, the plan envisages a population increase of 24,000 people for County Tipperary in the period from 2016 to 2031. In Table 4 of the Draft LAP, it is anticipated that Clonmel will have a population growth of 5,142 persons between 2016 and 2031. The Department made its submission to the draft CDP 2022-2028 regarding Clonmel on the basis of the same identified potential population growth within the town and its environs between 2016 and 2031. The Department has now applied the same projected 2031 growth figure of 22,282 identified in both the CDP and the draft LAP along with the recently published Census 2022 figure of 18,369 for Clonmel to determine that the potential projected growth figure from 2023 to 2031 for Clonmel now stands at 3,913 persons.

There are 12 schools (seven primary and five post-primary) located in Clonmel town. The Department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places as a result of the planned population increases. In terms of primary provision, the Department notes that in the **Adequacy of existing school places** (p54) it states that "At primary level, the projected scale of population increases to 2031 should be possible to meet through the expansion of existing schools". In this regard, the Department requests the Planning Authority to examine the potential of protecting a land buffer around each of the primary schools to enable them expand further if required to meet the future population growth in Clonmel town. At this moment in time, the Department has assessed that if



the projected growth for Clonmel materialises, it will put pressure on existing primary school facilities to accommodate the demand for extra school places. However, if the expansion of existing schools is not a practical or viable option, the possibility of establishing a new primary school in Clonmel may need to be considered. Presently, the Department cannot state that there is a definitive requirement for a new future primary school. However, the Department would ask Tipperary County Council to consider the option of zoning a suitable and appropriate site on the understanding that such a zoning can be revisited at a future date.

In terms of post-primary provision, the Department notes that in the **Adequacy of existing school places** (p54) states that "At post primary level the level of additional potential requirements arising from the projected population increase might require the provision of a new school, or best-case scenario, could be met at existing schools through expansions". It should be noted that the Department in its submission to the CDP stated that "the level of projected increased requirements is such that it is anticipated that the existing facilities (or expansion thereof) would meet the potential requirements arising from the increased population". Having now taken into account the draft LAP data identified above, the Department is re-affirming its CDP submission statement and therefore is requesting that the text in this section be amended to reflect this position.

Section 5.4.1 Primary and Secondary schools also states that according to the Department of Education, school place requirements are calculated as follows: Primary level equates to 11.5% of population and 25 students per classroom, and Post-primary are assessed at 7.5% of population numbers. The Department would like it noted that it regularly reviews its assessment criteria using a variety of data sources to determined the percentage of population figure to be used at any given time. As a result, the primary percentage figure has changed and may change again in the future depending on the circumstances at the time. The current primary school percentage has been amended to 10.25%. Currently, the post-primary figure remains at 7.5% as above. It should also be noted that the pupil teacher ratio is now 23:1 (i.e. one teacher for every 23 pupils) per classroom at primary level for the 2023/24 school year. The Department requests that the text in this section be amended to reflect the changes described above.

The Department notes and welcomes in section **Adequacy of Existing School Places** that this LAP has identified the existing schools in the LAP area and, where practical, has applied a land use zoning to enable expansion. In addition, a tract of greenfield land zoned 'Community Services and Infrastructure' has been identified north west of the junction of the N24 bypass and Heywood Road.

The Department notes and welcomes Policy 5.5 to support the development of new educational facilities, or the expansion, refurbishment of redevelopment of existing facilities where there is a demonstrable and identified need for such facilities.



The Department notes and supports Objective 5G to ensure the continued operation and expansion of schools in Clonmel on lands zoned for 'Community Services and Infrastructure', in line with the Provision of Schools and the Planning System Code of Practice (DoE, 2008).

The Department notes and supports Objective 5H to actively engage with the Department of Education in the identification and delivery of a second level school site to address the emerging demands.

The Department notes and welcomes 6.2.1 Safe Routes to School in Appendix 2 that proposed measures include a range of Safe Routes to School connections from key residential areas in the study area, new pedestrian crossings, permeability improvements and enhanced walking and cycling routes. The Department supports the development of sustainable travel links between schools and residential areas.

The Department notes and supports 7.2 Active Travel, School zone treatments to improve safety in front of Schools. (Appendix 2; Local Transport Plan)

In terms of assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The Department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. The Department also anticipates that additional special education needs provision at both primary and post-primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need. The Department will consult with the Council if and when additional special education needs accommodation is required within specific locations.

Finally, the Department welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasizes the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.

Yours sincerely.

Mairead Garry
Statutory Plans
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