An Roinn Oideachais Department of Education



Thurles Local Area Plan, Planning Department, Tipperary County Council, Civic Offices, Limerick Road, Nenagh Co Tipperary E45 A099

08th September 2023

Re: Draft Thurles 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 Thurles 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 2.2 of the Draft LAP it is anticipated that Thurles will have a population growth of 2,382 persons between 2016 and 2031. The Department considered this data and made its submission to the draft CDP 2022-2028 regarding Thurles on the basis of potential population growth within the town and its environs between 2022 and 2031. The Department has now applied the same projected 2031 growth figure of 10,322 identified in both the CDP and the draft LAP along with the recently published Census 2022 figure of 8,185 for Thurles to determine that the potential projected growth figure from 2023 to 2031 for Thurles now stands at 2,137 persons.

There are 8 schools (four primary and four post-primary) located in Thurles 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. 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 Thurles town.

The section "Adequacy of Existing School Places" states that the Department of Education has set out the following considerations in relation to Thurles:

• At both primary and post primary level, the maintenance of buffers around existing school sites to enable expansion is critical and land zoning should enable schools to expand.



- At primary level, the projected scale of population increases to 2031 should be possible to meet through the expansion of existing schools.
- At post primary level the level of additional potential requirements arising from the projected population increase could be met at existing schools.
- Notice of intention to deliver modular accommodation at Colaiste Mhuire has been further submitted to the Council to facilitate urgently required classroom spaces stemming from increased enrolments, including from children under international protection and/or children with special needs.

In terms of school place requirements, the Department re-affirms this position in this submission.

Section 5.5.1 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 Adequacy of Existing School Places that this LAP has identified the existing schools in the LAP area and has applied an appropriate land use zoning to enable and protect the expansion capacity of existing facilities.

The Department notes and supports 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 5F to ensure the continued operation and expansion of schools in Thurles 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 welcomes Safe Routes to School in Appendix 2 that the active travel measures have been built around creating a safe and attractive network of footpaths and cycle tracks that are suitable for use by children. This will support safe and sustainable access to local schools and support the national objective of ensuring more journeys to education are made by walking and cycling. The Department supports the development of sustainable travel links between schools and residential areas.

The Department notes in the Strategic Flood Risk Assessment Table 4 Justification Tests Lands associated with Ursuline Secondary School - A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. It also



states that the level of assessment is considered appropriate and has informed the zoning proposals and policies and objectives contained in the LAP. It notes that Section 4 of the SFRA outlines the measures integrated into LAP to adequately manage flood risks and that a precautionary approach has been applied to the zoning of lands with undeveloped lands that is liable to flood generally zoned for amenity or town environs use, flood risk maps have been overlain on the land use zoning map to clearly indicate lands constrained by flood risk. It is noted that the LAP is subject to the policies, objectives and requirements of the CDP that relate to flood risk and climate change and the LAP contains a number of specific policies and objectives in this regard.

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 Forward Planning Section

