

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Development: A 3 storey, 1,000 pupil post primary school (Roll no. 76454S) including a 4 classroom Special Educational Needs Unit with a gross floor area of 11,443sq.m including sports hall and all ancillary teacher & pupil facilities; bicycle parking; staff parking; vehicle drop off/set down areas; internal access roads; hard and soft play areas; piped infrastructure and ducting; plant; landscaping and boundary treatments; PV panels; external courtyards; disabled car parking spaces; ESB substation, ramps & stairs; signage; changes in level and all associated site development and excavation works above and below ground all on a site bounded to the east by the R136 Outer Ring, to the north by the existing site adjacent to south of Griffeen Avenue, to the west to existing site adjacent to Lucan East Educate Together National School and to the south to existing site adjacent to Adamstown Link Road. The proposed development is located within the Clonburris Strategic Development Zone Planning Scheme 2019 area.

Location: Kishogue Cross, Griffeen Avenue, Lucan, Co Dublin

Applicant: The Department of Education

Reg. Ref: **SDZ21A/0013**

Report Date: **20/07/2021**

Recommendation: **Request Additional Information**

Main Concerns:

- Impacts of the proposed development on existing trees, hedgerows and local biodiversity

- lack of natural SuDS (Sustainable Drainage System) shown for the proposed development

Site Area

2.34 ha

Zoning

The site is zoned 2SDZ” in the South Dublin County Development Plan 2016-2022 and is designated to be part of the Clonburris SDZ. The land use objective for the SDZ zoning reads:

“To provide for Strategic Development in accordance with approved planning schemes”

Clonburris Planning Scheme:

The site is located in Zone **KNW-S1**

Development Area 7 - Kishoge North West

Key objectives

- To develop a high-quality residential neighbourhood at Kishoge, with strong links with the existing community at Griffeen;
- To reinforce the existing local node at Griffeen with new open space and education facilities.
- To provide locally accessible open spaces and links to strategic open space.
- To develop a new post-primary to complement the existing primary school.
- To ensure high levels of legibility and ease of orientation.
- To provide a new quality frontage along Adamstown Avenue; and
- To provide for a range of housing of a scale that reflects the type of street and its role in the urban structure.
- The design of the school will be informed by the Department of Education and Skills ‘General Design Guidelines for Schools: Primary & Post Primary (2017)’ or any superseding guidance

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

DP 2016-22 Section 8.3.0 Public Open Space Hierarchy and Landscape Setting

It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.

G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

DP 2016-22 Section 8.1.0 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

G2 objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting etc. into existing areas of hard infrastructure wherever possible.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

DP 2016-22 Section 8.5.0 Green Infrastructure within Urban Areas

G6 Objective 1: To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

DP 2016-22 Section 9 Heritage Conservation and Landscapes

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

DP 2016-22 Section 8.4.0 Sustainable Urban Drainage Systems

Sustainable Urban Drainage Systems (SUDS) drain surface water in an environmentally friendly way by replicating natural systems in managed environments. SUDS systems seek to collect, store and clean surface water using natural systems and to release it back into the environment in a slow and controlled way, thereby reducing the risk of fluvial and pluvial flooding. Key features, such as integrated

constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems

G5 Objective 2: To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments

Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites. Relevant points within this section include:

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- The Council will promote the replacement of trees removed to facilitate approved planning and development of urban spaces, buildings, streets, roads, infrastructural projects and private development sites.

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following:

1. Landscape Plan

There is a lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide a fully detailed landscape masterplan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscaping including levels, sections/elevations and details, detailed design of SUDs features

including swales, permeable paving, green roofs and integrated tree pits etc. **ADDITIONAL INFORMATION.**

REASON: To assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.

2. Impact of Development on Green Infrastructure

The Public Realm Section considers that the proposed development will have a significant impact on the existing green infrastructure and will result in the loss of significant existing hedgerows and tree within the development site. The applicant is requested to submit revised plans to include the following:

- i. Significantly reduce the impacts of the development on existing green infrastructure within the proposed development site
- ii. Demonstrate how natural SUDS features can be incorporated into the design of the proposed development
- iii. Submit green infrastructure proposals that will mitigate and compensate for the impact of the proposed development on this existing golf course site. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population. Response should include revised layout and drawings. **ADDITIONAL INFORMATION**

3. Arboricultural Impact of the Proposed Development

It is proposed to remove all trees and hedgerows located within the application site boundary in order to facilitate the proposed development. This will include the removal of 38 no. trees and five groups of trees/hedgerows and the part removal of three groups of trees/hedgerows. This would contravene policies G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 and other GI policies and objectives in the CDP. The current proposal will have a significant negative impact on existing trees, hedgerows and associated biodiversity within the development site area. Every effort should be made to retain existing trees and woodlands where possible as this network of existing trees and woodlands provides corridors for biodiversity and habitats for existing flora and fauna. Response should include a revised layout to reduce the impact of the proposed development on the existing trees and hedgerows. **ADDITIONAL INFORMATION**

REASON: To ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area, in accordance with policies G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.

4. SUDS

There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system. The SUDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The applicant shall show further proposed SuDS features for the development such as, grass areas, tree pits, channel rills, swales and other such SuDS and show what attenuation capacity is provided by such SuDS. **ADDITIONAL INFORMATION**

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

5. Implementation of Landscape Plans

The Landscape Plans once agreed, shall be implemented in full, within the first planting season following completion of the development (completion of construction works on site).

- All hard and soft landscape works shall be completed in full accordance with the approved Landscape Plan.
- All trees, shrubs and hedge plants supplied shall comply with the requirements of BS: 3936, Specification for Nursery Stock. All pre-planting site preparation, planting and post-planting maintenance works shall be carried out in accordance with the requirements of BS : 4428 (1989) Code of Practice for General Landscape Operations (excluding hard surfaces).
- All new tree plantings shall be positioned in accordance with the requirements of Table 3 of BS 5837: 2012 "Trees in Relation to Design, Demolition and Construction – Recommendations".
- Any trees, shrubs or hedges planted in accordance with this condition which are removed, die, become severely damaged or become seriously diseased within three years of planting shall be replaced within the next planting season by trees, shrubs or hedging plants of similar size and species to those originally required to be planted. **CONDITION**

Reason: To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting of the CDP 2016-2022.

6. Retention of Landscape Consultant

To ensure full implementation of the proposed landscape design, the developer is required to retain the services of a Landscape Consultant throughout the life of the site development works. A completion certificate is to be signed off by the Landscape Consultant when all works are completed and in line with the submitted and agreed landscape drawings. **CONDITION**

Reason: To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting of the CDP 2016-2022.

Summary

The Public Realm Section has no objections in principle to the proposed development and would see this new school as a positive addition to the local area. However, the proposed new school in its current configuration will have a significant detrimental effect on the existing trees, hedgerows and associated biodiversity and ecology contained within the development site area as the proposed development will require the removal of all trees and hedgerows located within the application site boundary in order to facilitate the proposed development. Therefore, in its current configuration this proposed school and associated site infrastructure would contravene policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 and other GI policies and objectives in the County Development Plan.

The Public Realm Section is requesting that if possible, the applicant alter the layout of the proposed school to ensure that a higher percentage of the existing trees and hedgerows on site are retained and protected.

Prepared By: Oisin Egan

Executive Parks Superintendent

Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent