

**AFEC International**  
Unit B6, Swords Enterprise Park  
Feltrim Road  
Swords  
Co. Dublin

**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING  
REGULATIONS THEREUNDER**

<b>Decision Order Number:</b> 1209	<b>Date of Decision:</b> 26-Sep-2022
<b>Register Reference:</b> SDZ22A/0011	<b>Registration Date:</b> 02-Aug-2022

**Applicant:** Department of Education

**Development:** The proposed primary school will extend to c3,355sq.m will be 2 storeys in height and will comprise 16 no. classrooms with an additional 2 classroom Special Educational Needs Unit; a General Purpose Hall and all ancillary teacher and pupil amenities and facilities. The proposed development also provides for hard and soft play areas, including 2 no. outdoor ball courts, bicycle parking, staff car parking, vehicle drop off and set down areas. Photovoltaic Panels (PV) are proposed on roofs in addition to EV Charging Points and a packaged Biomass heating plant. The proposed development also provides for all landscaping and boundary treatments and all associated site development works. Access to the site will be via a new junction and access road off Thomas Omer Way. The new access road will run south off Thomas Omer Way and then west into the site. The proposed access road is in accordance with the Clonburris Strategic Development Zone (SDZ) Planning Scheme and incorporates public lighting, footpaths and cycle tracks. A further pedestrian / cycle only connection to Thomas Omer Way is also proposed along the western green corridor, west of the proposed school building.

**Location:** Thomas Omer Way, Balgaddy, Lucan, Dublin

**Application Type:** Permission

Dear Sir /Madam,

With reference to your planning application, received on 02-Aug-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1.
  - a. One of the Key objectives for Kishoge North East is 'to provide a distinctive, diverse and quality frontages to Thomas Omer Way, the avenues/Link Streets and the strategic open spaces'. It is noted that the proposal cannot provide frontage directly to Thomas Omer Way, the applicant is requested to revise how the open space to the south is addressed, in the context of the objective for the area.
  - b. The applicant is requested to re-examine the streets that they are proposing to deliver. There are concerns that the delivery of an element of the link street would be premature, as there are strategic infrastructure requirements linked to its delivery. It may be more feasible to provide a local street linking to Thomas Omer Way, either to the east of the proposed school, in link with figure 2.2.7 or to the west, linking up with the adjacent existing school site. It should be noted that the area to the west is also proposed as a green infrastructure link and any development in this location should be mindful of this designation. Any revised street proposal should be accompanied by the relevant roads assessments in terms of visibility and safety.
  - c. In terms of street design, it is not apparent that the proposed streets are laid out in accordance with the requirements of the scheme, the applicant is therefore requested to re-design streets to ensure compliance with Figure 2.2.6 of the Planning Scheme (and Figure 2.2.5, if relevant).
  - d. The Planning Authority is concerned that the applicant is providing pedestrian/cycle route to the west, adjacent to existing access points on the adjacent school site. The applicant is requested to assess whether it is possible to connect into these existing routes.
  - e. It is also noted that the submitted landscape plan identifies the access point in the northwestern side boundary operating as an emergency access/exit only. It is recommended that the applicant amend this entrance to provide more direct access/ egress to proposed school for pedestrians and cyclists on a day-to-day basis. More generally, entrances into the school building from the west for pedestrians and cyclists should be emphasised in the elevational design for wayfinding purposes.
  - f. The proposed cycle parking is located on the south eastern corner of the site, away from the western pedestrian and cycle entrance . It is recommended that the applicant should consider locating a significant proportion of cycle parking on the western side of the site also, in the interests of providing more direct access to the school for cyclists off Thomas Omer Way.
2.
  - a. The applicant is requested to submit a revised MMP with ambitious targets for cycling, walking and public transport for staff and students, and commitments to the implementation of measures that will seek to achieve these.
  - b. The applicant is requested to submit revised details that indicate the following:
    - That sufficient cycle parking is provided on site which would cater for at least 20% of staff and 20% of students using this mode;
    - That the cycle parking is relocated on site in a manner which ensures full cycling priority from the external road network to the parking and that no roads are required to be crossed by children within the site; and
    - A toucan crossing is provided on the north-south road forming the eastern boundary of the site which accommodates cyclists travelling on Thomas Omer Way from the east.
  - c. The applicant is requested to provide clarity in terms of the quantum of drop-off spaces, its location, and a full justification for both in terms of road safety and promotion of sustainable transport modes.
3.
  1. The applicant is requested to submit a revised layout of not less than 1:200 scale showing the location and number of parking spaces to be provided at the development. Please refer to Table 12.25: Maximum Parking Rates (Non-Residential) – from the SDCC County Development Plan 2022-2028.
  2. The applicant is requested to submit a revised layout of not less than 1:200 scale, showing how

east bound vehicles will turn right from the Thomas Omar Road into the proposed link street (if retained).

3. The applicant is requested to submit a revised layout showing how the items identified in the road safety audit will be rectified.
  4. The applicant is requested to submit a revised layout of not less than 1:200 scale, detailing how fire tenders will access the building.
  5. The applicant is requested to submit a revised layout showing the location of refuse collection points.
  6. The applicant is requested to submit a revised layout of not less than 1:200 scale showing the cross section of the access roads, ensuring they confirm to the layout described in the Clonburris SDZ masterplan.
4. The applicant is requested to provide a green infrastructure plan and proposals that demonstrate:
- i. The protection and enhancement of a Strategic Green Corridor along the Western and Southern Boundaries that define the Barony boundary – by greater retention of trees and hedgerows and inclusion of nature-based SuDS incorporating a ‘waterway/SuDS’ along the southern boundary. A Local Green Corridor along the boundary with Thomas Omer Way. The removal of trees and hedgerow along the northern boundary to make way for more open planting is contrary to SDCC Green Infrastructure Policies. Retention of existing treeline; strengthening of planting proposals and incorporation of nature-based SuDS.
  - ii. Provision of street trees 18-20cm girth on both sides along local roads within the development, as identified by Clonburris Parks and Landscape Strategy. Landscape Plan to extent to include the whole of the development ,i.e., include vehicular access road
  - iii. Provide a Green Infrastructure Plan: demonstrate compliance with the requirements of 12.4.2 of the County Development Plan: i.e. how the proposals contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements, having regard to:
    - ii. Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands);
    - iii. The characteristics and assets of the proximate GI Core, Corridor or SteppingStone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways;
    - iv. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value;
    - v. Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;
    - vi. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
    - vii. All development proposals shall be accompanied by a Green Infrastructure Plan, which will normally be submitted as part of the suite of Landscape Plans that are required for a development.

Plans shall include the following:

- viii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;
  - ix. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
  - x. Indicate how the development proposals link to and enhance the wider GI Network of the County;
  - xi. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site;
  - xii. Proposals for identification and control of invasive species.
5. The applicant is requested to provide a comprehensive bat survey and an assessment of the lighting design by a suitably qualified bat expert.
  6. The applicant is requested to submit:
    - a. A hedgerow management plan that shows:
      - i) The protection and enhancement of the hedgerow network, in particular hedgerows that form townland, parish and barony boundaries
      - ii) The amount of trees and hedgerow being removed and the amount of compensatory/replacement hedgerow being planted as part of the proposals.  
To be in compliance with the SDZ, and the requirement of no net loss of hedgerow across the scheme, the amount of compensatory/replacement hedgerow provided in this development shall be at least equal to that being removed. The compensatory/replacement hedgerow can be planted within the site area or within the wider SDZ.
    - b. A tree and hedgerow protection plan, indicating:
      - i) Revision of tree and hedgerow protection plan to reflect revised design to create Strategic and Local Green Corridors.
      - ii) A Method Statement for the construction, planting regime and species selection of both 'dry' and 'wet' hedgerows (all planning applications for developments within 10m of existing hedgerows along the barony boundary).
  7. The applicant is requested to provide landscape proposals that extend to the full of the redline boundary including (the) vehicular access road(s) and demonstrate trees to be provided as per the Scheme:
    - a) A high quality of Street Tree planting along vehicular accessways (local roads) to strengthen Green Infrastructure links.
    - b) 'Streets should be generously planted at frequent intervals to soften the impact of parking and strong building frontages at intervals of 14 – 20 metres. In the interest of biodiversity and place making, reduced spacing between street trees should be considered where appropriate and achievable. (Planning Scheme P64).
    - c) Thomas Omer Way (Local Green Corridor): Retention of existing trees and enhanced planting shall be provided by additional trees, hedgerow, grassed and planted swales and small-scale SuDS as appropriate to create a Local Green Corridor along this street as required by the Planning Scheme.
    - d) Western and Southern Boundary (Strategic Green Corridor) Retain all of the existing hedgerow and strengthen existing proposals and create the required Strategic Green Corridor. Enhanced planting shall be provided by additional street trees, hedgerows, grassed and planted swales and small-scale SuDS as appropriate to create a Strategic Green Corridor. The SDZ drawings require a waterway/SuDS along the southern Strategic Green Corridor.
    - e) Trees lined roadways on both sides. The applicant is referred to the Clonburris SDZ Planning Scheme 2019, Clonburris SDZ Parks and Landscape Strategy and DMURS (2019) for guidance on

street tree provision and appropriate design layouts for local roads/streets.

f) All Street Trees and trees adjacent to hard surfaces shall have suitable tree pits that incorporates SuDS bioretention features including sufficient growing medium.

g) Street Trees to be planted at:

- Minimum 18-20m girth along local roads

8. The following additional information is requested:

i. A SuDS proposal that complies with SDCC SUDS Explanatory Design and Evaluation Guide; the Clonburris SDZ Planning Scheme, Parks and Landscape Strategy and Biodiversity Management Plan and SDCC County Development Plan 2022-2028.

ii. Concept plans showing existing and proposed flows.

iii. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development, particularly along strategic and local green links, e.g. bioretention tree pits, swales, rain gardens, green roofs etc.

iv. Swales to be planted with native and pollinator perennial riparian wildflowers using local species. Full species lists for the SDZ can be found in Ecological Survey of Clonburris (FERS Ltd., 2018)

v. The SuDS proposals should be a collaboration between landscape architect and the drainage engineer to integrate the SuDS into the landscape design proposals providing amenity, biodiversity, water quality treatment as well as quality and attenuation.

vi. Drainage and Landscape proposals to be consistent regarding SuDS provision. For example, only grasscrete shown on landscape plan; this is omitted from Engineers drawing; None of the SuDS proposals on engineers plans are shown on landscape proposals.

vii. Drainage design proposals for the site that incorporate the waterway/SuDS/wetland along the southern site boundary.

viii. Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage and landscape design for the proposed development.

ix. Details on how each SuDS element function as part of the overall treatment/management train.

x. Demonstrate the biodiversity, amenity, water quality and attenuation value of all SuDS features including proposals for integrating the existing ditch to the northwest.

xi. Any proposed swales should be used for attenuation as well as conveyance of overland flow. They should also have an amenity and biodiversity value.

xii. A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.

xiii. A minimum 10m setback from the top of the bank from watercourses bounding the site.

xiv. Demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology

xv. Inclusion of all above ground SUDS features in attenuation calculation (avoid underground systems). SDCC do not accept underground tanks unless it is demonstrated that above ground SuDS devices are not feasible.

9. The applicant is requested to provide a revised detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of Council's Public Realm Section. The revised landscape plan shall maximise the retention of existing boundary hedgerows, integrate tree planting and SuDS drainage to provide strong green infrastructure links throughout the development in accordance with Clonburris SDZ Planning Scheme, Parks and

Landscape Strategy , Biodiversity Management Plan and SDCC County Development Plan (2022-2028).

The revised Landscape Proposals shall incorporate:

- i. Street trees that are in line with the requirements set out in the Clonburris Strategic Development Zone Planning Scheme (Clonburris SDZ) 2019; Clonburris Parks and Landscape Strategy, Clonburris Biodiversity Management Plan and the 'Design Manual for Roads and Streets (DMURS) 2019. Street tree provision to incorporate small scale SuDS features that enhance biodiversity, provide amenity, manage surface water volume while providing water quality treatment.
  - ii. Details of roadside tree planting to be submitted to the Public Realm Section of SDCC for agreement. Urban tree pits to include SUDs measures / storm water attenuation. The applicant shall submit cross section details of the SUDs tree pits, including growing and drainage/storage media.
  - iii. Trees along local roads to be a minimum of 18 to 20-centimetre girth (cmg) at planting as per the requirements of the Clonburris SDZ Parks and Landscape Strategy. For suggested native species see P. 53 of the Strategy.
  - iv. Retained, removed and compensatory hedgerow to be clearly identified on Landscape Plans.
  - v. Details of all natural SuDS features including swales, rain gardens, bioretention tree pits, channel rills, filter strips, ponds, detention basins with lower areas allowed to fill first (low flow channels), wetlands etc; and to be shown on the landscape plans
  - vi. Landscape masterplan/planting plan to clearly delineate lighting to ensure tree planting proposals are realistic and not damaging to the Strategic Green Corridor and to Bats. If this is not currently the case, proposals to be revised to ensure street tree delivery.
  - vii. Tree and hedgerow protection measures: show extent and position of tree and hedgerow protection fences including protection of all vegetation along the Strategic Green Corridor along the Barony Boundary.
  - viii. The relevant requirements of the Clonburris Parks and Landscape Strategy.
  - ix. Landscape Proposals to reflect the requirements of above additional information to deliver the required green infrastructure.
10. The applicant is requested to provide clarification of the open space provision, in light of the school size and the proposal for out of hours community use of these facilities.
11. a. The surface water attenuation volume proposed of 840m<sup>3</sup> is undersized by approximately 50%. The applicant is requested to submit a revised drawing and report showing increased surface water attenuation volume for the development. The surface water attenuation should be provided by SuDS in so far as this is possible. Prior to submission of revised documents contact water services to discuss same. Also, it is required by SDCC drainage section for a climate change factor of 20% to be applied to attenuation calculations.
- b. There are no soil percolation test results, design calculations or dimensions submitted for the proposed soakaway. The applicant is requested to submit a report showing site specific soil percolation test results and design calculations for the proposed soakaway in accordance with BRE Digest 365 – Soakaway Design. Subject to percolation test results passing test, all additional Surface Water is to be directed to proposed soakaway. If the percolation test does not indicate soil conditions are suitable for a soakaway, a written agreement from Irish Water is required in order to connect the surface water overflow to foul system.
- c. The applicant is requested to submit a revised drawing showing plan and cross-sectional views, dimensions, and location of proposed soakaway. Any proposed soakaway shall be located fully within the curtilage of the property and shall be:

- i) At least 5m from any building, public sewer, road boundary or structure.
- ii) Generally, not within 3m of the boundary of the adjoining property.
- iii) Not in such a position that the ground below foundations is likely to be adversely affected.
- iv) 10m from any sewage treatment percolation area and from any watercourse / floodplain.
- v) Soakaways must include an overflow connection to the surface water drainage network.

12. The Planning Scheme requires, where feasibly practical and viable, the provision of green roofs for all new public buildings (Council buildings, school buildings, hospitals, community centres, sports facilities, libraries, Garda stations etc), to assist in flood alleviation, insulation and improved biodiversity, and to actively promote these measures where appropriate in new commercial and industrial buildings. The applicant is requested to address this.

**NOTE:** The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

**Note:** The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period, the planning authority shall declare the application to be withdrawn.

**Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked "ADDITIONAL INFORMATION" and that the Planning Register Reference Number given above is quoted on the covering letter.**

Signed on behalf of South Dublin County Council

**Register Reference:** SDZ22A/0011

**Date:** 29-Sep-2022

Yours faithfully,

*Pamela Hughes*  
for **Senior Planner**