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Tallaght,  
Dublin 24,  
D24 A3XC

**15 September 2021**

Dear Sir or Madam

**Re: Draft South Dublin County Council Development Plan (2022-2028)  
Stage 2: Public Consultation  
The King's Hospital School, Palmerstown**

We write on behalf of our client, The King's Hospital School, to make a submission on Stage 2 of the draft South Dublin County Council (SDCC) Development Plan (2022-2026). This correspondence provides both strategic level and site-specific commentary on the draft Development Plan.

We trust that its contents will be afforded due consideration in the Stage 3 Material Alterations to the draft Development Plan.

### **The King's Hospital School Campus**

The King's Hospital School is located on a 34ha campus in Palmerstown, Dublin 20. It was founded in 1669 and has operated from the current campus since the early 1970s as a co-educational secondary school for boarders and day students. There are approximately 720 students (including 300 boarders) and 150 staff.

Educational attainment and extra circular activities both play an essential part of every pupil's time at The King's Hospital School. Extra circular activities include sports and exercise; performing arts; speech and drama; and music.

The King's Hospital School's sports programme is one of the best in Ireland. One of the key reasons for this is the availability of approximately 30 hectares of open space at the campus. Pupils have access to six rugby pitches; two all-weather hockey pitches; basketball and tennis courts; and track and field space. These are complemented by the on-campus swimming pool and other internal sporting facilities.

Within this context, we set out below some site-specific and strategic level comments on the draft Development Plan.

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## Map Sheet 2 – Requested Amendments

In the draft Development Plan, The King’s Hospital School retains the Objective HA zoning from the current Development Plan. While other designations remain broadly unchanged from the current Development Plan (2016-2022), we request the following amendments to the draft Development Plan.

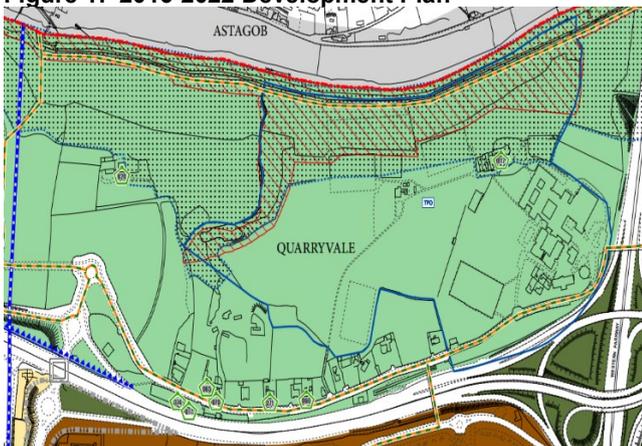
### 1. Absence of playing pitches

The current Development Plan (2016-2022) Map Sheet 2 outlines both the academic buildings and external sports pitches at the campus. As detailed in Figure 2 however, the draft Development Plan Map Sheet 2 removes the outline of the main sports pitches at The King’s Hospital School campus.

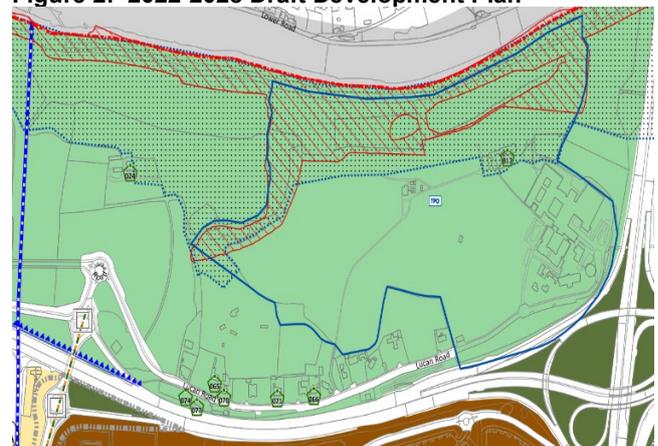
We believe that the current Development Plan map provides important confirmation of the formal sporting component at the campus. It confirms that the area to the west of the educational buildings is not excess or unused green space. As the Development Plan mapping is a key component for assessing planning applications and for informing external third parties, it is important that the use of these lands is not misconstrued.

Accordingly, we request that the outline of the sporting pitches is reintroduced to Map Sheet 2.

**Figure 1: 2016-2022 Development Plan**



**Figure 2: 2022-2028 Draft Development Plan**



### 2. Ecological Designations

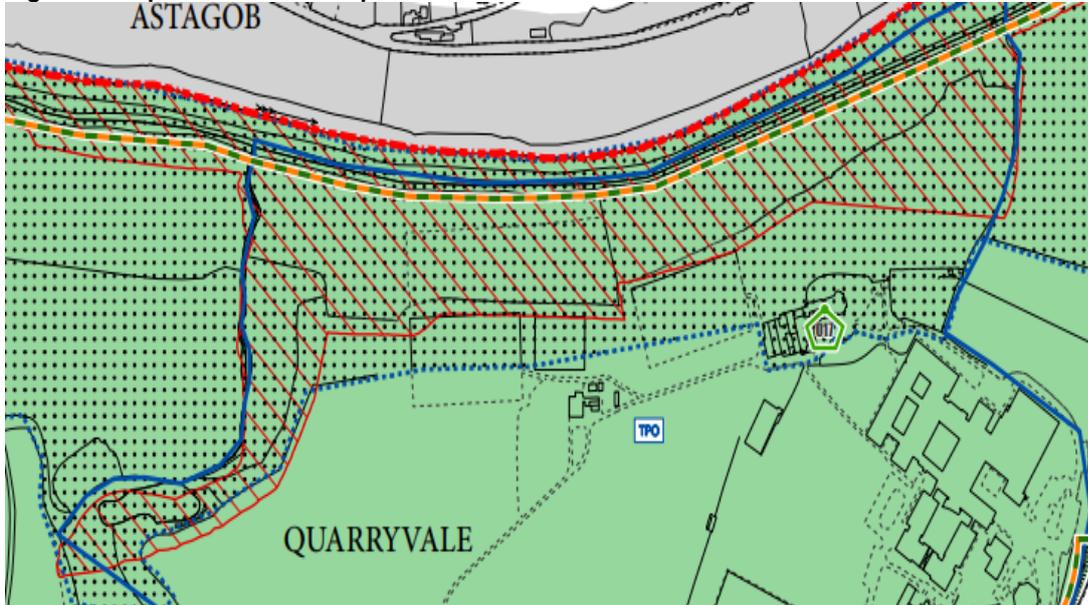
The northern boundary of The King’s Hospital School is covered by two ecological / environmental designations. These are the Liffey Valley Special Area Amenity Order (SAAO) and the proposed Natural Heritage Area (pNHA).

**Figure 3: Ecological and Environmental Designations**



As noted in Figure 4, the SAAO extends significantly further into the campus than the pNHA. The SAAO includes land that is principally in hardstanding or playing pitches. The outline of the existing pitches can be seen within the SAAO boundary in the current Development Plan (2016-2022) Map Sheet 2.

Figure 4: Map Sheet 2 – Development Plan 2016-2022



As detailed in Figure 5, there is little existing vegetation compared to land to the north of the playing pitches.

Figure 5: Aerial View of SAAO and pNHA



The pNHA boundary is more recent delineation compared to the 1990 SAAO boundary. The pNHA boundary follows the northern outline of the existing playing pitches. It is clearly more reflective of the lands of ecological value at the campus.



Accordingly, we request that the SAAO boundary is amended to align with the pNHA boundary. This amendment will provide important clarification on the lands that warrant protection, and those that are in active use for sporting activities.

### 3. Tree Preservation Order (TPO)

The King's Hospital School is the subject of an extensive TPO. While existing trees make an important contribution to the attractive setting of the campus, the quality of trees varies significantly.

The main structural planting at the campus along the northern and western boundaries. Additional significant planting is located on parts of the southern boundary. The remaining trees within the campus are less significant and provide a decorative function. Accordingly, a blanket TPO across the entire campus is unwarranted. It places unnecessary burden on an operational school and sporting campus environment.

In accordance with Policy NCBH11 of the draft Development Plan, we request that the Council review the existing TPO to identify those of conservation value. Our client would be pleased to engage with the Council to undertake this updated assessment.

### **Comments on Draft Development Plan Objectives**

#### Policy NCBH4 Objective 2:

Policy NCBH4 Objective 2 states that the Council will:

*'restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional.'*

Our client understands the importance of protecting Natural Heritage Areas in the County. We request however, that Policy NCBH4 Objective 2 acknowledges the need to balance the operational requirements of longstanding and low impact existing uses. The King's Hospital School has operated from its campus prior to the SAAO and pNHA designations. It is essential therefore, that these designations do not preclude the necessary improvements to educational and sporting facilities at the campus.

#### Other Objectives

The need to support improvements to school and sporting facilities is clearly set out in the draft Development Plan. Accordingly, we confirm our client's support for the following objectives:

- COS4 Objective 2
- COS4 Objective 3
- COS4 Objective 8
- COS4 Objective 9
- COS4 Objective 11
- COS8 Objective 2
- COS8 Objective 4
- COS8 Objective 5
- COS8 Objective 9



### **Summary and Conclusion**

We write on behalf of our client, The King's Hospital School, to make a submission on Stage 2 of the draft SDCC Development Plan (2022-2026). This correspondence provides both strategic level and site-specific commentary on the draft Development Plan.

We trust that its contents will be afforded due consideration in the Stage 3 Material Alterations to the draft Development Plan. Should you require any additional information or clarification, please do not hesitate to contact Raymond Tutty or Sarah Cullen in the Savills Planning team.

Yours faithfully

Savills Commercial (Ireland) Ltd  
Planning