

SID Planning Submissions Response Report

St Edmundsbury – Strategic
Infrastructure Development (SID)
at Lucan, Co. Dublin

Prepared for:

**The Governors of St. Patrick's
Hospital**

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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
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24th July 2026
[By email to laps@pleanala.ie]

Dear Sir/Madam

Re: RESPONSE TO AN COIMISIUN PLEANALA REQUEST, DATED 1 JULY 2026 (ACP REF. PA06S.324264) IN RESPECT OF THE PROPOSED STRATEGIC INFRASTRUCTURE DEVELOPMENT AT ST. EDMUNDSBURY HOSPITAL, LUCAN, CO. DUBLIN.

1.0 INTRODUCTION

The Governors of St. Patricks Hospital ('the applicant') have retained Tom Phillips + Associates (TPA) along with the multi-disciplinary team of TOT Architects, JBA Consulting and Carrig Conservation to prepare this First-Party Submission in response to a request issued by An Coimisiún Pleanála (ACP). This request invited the applicant to comment on observations submitted on the Strategic Infrastructure Development (SID) application for a proposed new Mental Health Hospital Facility and associated facilities, in the grounds of the existing St. Edmundsbury Hospital site in Lucan, Co. Dublin. This was requested via email on the 1st of July, and this response has been submitted before the stated deadline of 28th July, 2026. A hard copy of this response has also been provided.

A total of 6 no. submissions were made on the SID application. Of these, 4 no. submissions were from 'prescribed bodies' with the other 2 no. submissions received from third-party observers from the public.

The 4 no. from the 'prescribed bodies' are as follows:

- Department of Housing, Local Government and Heritage, dated 23rd June 2026
- Health Service Executive (HSE), dated 18th June 2026
- Transport Infrastructure Ireland (TII), dated 22nd May 2026
- Uisce Eireann, dated 23rd June 2026

The 2 no. from the third-party submitters are as follows:

- Catherine O'Donnell, dated 22nd June 2026
- Eileen Dennehy, dated 21st June 2026

This response has been structured to respond, systematically, to each of the submissions made and the items raised within by directing ACP to the relevant sections of the submitted application addressing comments made in the relevant observations. The submission does not include any additional reports or supplementary documents. Where prescribed bodies and third-party observers raised items covered in other submissions, we have cross-referenced our responses to the items to avoid any duplication.

It is noteworthy that only a limited number of submissions were received from members of the public. While the absence of submissions should not be interpreted as definitive evidence of public support, the relatively low level of third-party engagement may reasonably be viewed as reflecting the established presence and accepted role of the facility within the local area. St. Edmundsbury has operated from this location since the nineteenth century and has long formed an integral component of the surrounding community.

Furthermore, the proposed development seeks to expand and enhance existing mental health facilities on an established healthcare campus, responding to a recognised and growing demand for specialist mental health services at both a local and national level. In this context, the limited level of public objection may be considered indicative of a broad recognition of the importance of the essential services currently provided on the site and the clear public benefit associated with their continued expansion and improvement.

It is also noted that the Applicant undertook an extensive programme of public consultation in advance of the lodgement of the application, as detailed within the Environmental Impact Assessment Report (EIAR). This consultation process provided meaningful opportunities for engagement with the local community and relevant stakeholders, enabling the proposed development to be informed by feedback received prior to the submission of the application. The limited number of third-party submissions received during the statutory consultation period may also be viewed in the context of this comprehensive pre-application engagement process, through which potential issues were identified and considered at an early stage in the design and assessment of the proposed development.

The Coimisiún should also have regard to the fact that this application was brought forward following extensive engagement with South Dublin County Council (SDCC) over several years prior to its submission. Through this iterative process, the design of the development was refined and informed by ongoing consultation with the Planning Authority. The proposal now before the Coimisiún is therefore the product of a comprehensive and robust planning process and represents a carefully considered response to the planning, environmental and operational requirements of the site.

This is further evidenced by the *Letter of Comfort* issued by SDCC prior to the lodgement of the application, which confirms the Council's support in principle for the proposed development and its willingness to work collaboratively with the Applicant in relation to the proposed development, as well as Transport Infrastructure Ireland in progressing the wider upgrade works along the Lucan Road corridor. The *Letter of Comfort* demonstrates that the proposal has been developed through a proactive and constructive engagement process with the Planning Authority and provides a clear indication of the Council's recognition of the merits of the scheme. A copy of the correspondence is enclosed for ease of reference. This letter states;



“SDCC wish to inform the client of the proposed St. Patrick’s hospital development that it is broadly supportive of the intended planning application subject to the several additional planning conditions outlined below being attached to any decision on planning permission.”

2.0 PRESCRIBED BODIES SUBMISSIONS

As noted above, 4 no. submissions were received from Prescribed Bodies in relation to the proposed development. These are assessed individually below and overleaf.

2.1 DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by the Department of Housing, Local Government and Heritage on the 23rd of June, 2026. This submission is noted under two separate headings, which include;

- Nature Conservation
- Archaeology

These are discussed in turn below.

2.1.1 Nature Conservation

This section of the submission sets out the documentation that was reviewed by the Department in advance of preparation. This includes the planning statement, environmental impact assessment report (EIAR) and appropriate assessment screening report. In addition, this section sets out, in broad terms, the proposed development and the planning policy context pertaining to the subject site.

The submission notes the baseline ecological impact assessment and survey work pertaining to the subject site, including the assessment on the proposed NHA woodland (pNHA). It then assesses the mitigation measures outlined in the EIAR for the construction phase.

As noted in the submission, the EIAR proposes a measure to mitigate the loss of this part of the pNHA the translocation of turves of soil from the area to be lost together with seeds and saplings to a new area of woodland to be established to the east of the existing area of woodland within the development site on an area at present occupied by grassland, and the use of turves from the latter area to establish green roofs to be incorporated into the landscaping of the new hospital.

Other measures are also proposed in the EIAR to mitigate the possible effects of the proposed development on biodiversity, including managing runoff and dust generated during the development’s construction phase, and minimising light pollution during both its construction and operational phases. As well it is intended to implement various biodiversity enhancement measures such as the installation of bat boxes and incorporation of swift bricks and nest boxes/sites suitable for house martins and swallows into the design of the hospital.

These measures should compensate to some extent for the loss of nesting sites for several bird species because of the proposed removal of the remains of old farm buildings from the hospital site. The submission then notes;

“Overall however, even with the implementation of these mitigation and biodiversity enhancement measures, because of the loss of the area identified in the EIAR as Improved agricultural grassland/ Dry meadow and grassy verges mosaic (now converted to arable) under the footprint of the hospital, the proposed development will likely lead to a net loss of biodiversity. While these habitats are of limited floristic value, they contribute significantly to the area of the St. Edmundsbury lands available to be foraged on or over by bird species and bat and other mammal species present in the area. Particularly for predatory bird species, such as long-eared owl, barn owl and buzzard recorded at St. Edmundsbury, the land-take for the hospital will lead to the loss of important foraging habitat and is likely to result in a reduction of these species’ usage of/ or their numbers in the St. Edmundsbury area. The loss of suitable foraging habitat for other bird species will also similarly likely reduce the numbers of bird species and numbers of individual birds in St. Edmundsbury lands.”

In this regard, the Department then recommends that the following conditions be attached to the permission, should it be granted;

1. *“That details of the various measures set out in the EIAR submitted in support of the present application to mitigate the proposed development’s potential effects on biodiversity during the construction phase should be included in a Construction Environmental Management Plan (CEMP) to be submitted for the written agreement of the planning authority before the commencement of development works on site, the CEMP to include timelines and a program for the implementation of these mitigation measures and to be implemented in full*

Reason: *To minimise the potential adverse effects of the proposed development on animal and plant species and habitats of conservation importance occurring on the St. Edmundsbury lands and adjacent areas, including the Liffey Valley pNHA, during the development’s construction phase.*

2. *That a Nature Conservation Plan should be drawn up for the St. Edmundsbury site and submitted for the written agreement of the planning authority before the commencement of site development works, this plan to include the locations within the proposed development where the various biodiversity enhancement measures outlined in the EIAR, such as the provision of swift bricks, bird nesting boxes, bat boxes and bat friendly lighting, are to be undertaken, and a program for their implementation and the monitoring of their success.*

Reason: *To provide nesting sites for bird species of conservation significance, including swift, house martin and swallow, and roosting sites for bat species subject to a system of strict protection under the Habitats Directive (92/43/EEC), to help maintain these species’ presence on the St. Edmundsbury lands into the future”*



Following receipt of the submission, the project environmental specialist, JBA Consulting, has reviewed the submission by the Department. In this regard, the following response is noted that a construction management plan was submitted with the proposed development. The applicant is agreeable to accepting incorporation of ecological measures into the construction management plan should this be conditioned. It should also be noted that Section 4.6 of the submitted Environmental Impact Assessment (biodiversity mitigation) included a programme for the implementation of the mitigation measures. The applicant, as noted in the EIAR, is to implement and adhere to these measures. Should additional measures separately, as identified in the conservation impact documentation, need to be included within a revised construction management plan, these may also be included in an updated construction management plan in this regard, to be submitted and agreed through compliance prior to the commencement of development.

Regarding a Nature Conservation Plan, JBA Consulting will work with the applicant to develop a Nature Conservation Plan as part of the planning permission conditions compliance, should An Coimisiún be minded to include a condition regarding this. This will include implementation of the mitigation measures for protected species within the boundaries of the site in particular the creation of nesting sites for bird species of conservation significance and bat roost boxes. It will detail a program for the managing and monitoring of the success of these measures over an agreed timeframe.

2.1.2 Archaeology

The submission from the Department then assesses the submitted information in respect of archaeology. It is noted that an Archaeological Impact Assessment (AIA) was submitted with the planning application by ACAS, under EIAR Chapter 10. The Department notes that the EIAR was informed by a programme of Archaeological Monitoring of Site Investigations as well as a walkover survey. The National Monuments Service (NMS) have reviewed the EIAR and the submission notes that it is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

The Department advises that the following should be included as a condition of any grant of permission;

1. *All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 10 of the EIAR (date April 2026) shall be implemented in full, except as may otherwise be required to comply with the conditions of this Order.*
2. *The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works; topsoil stripping or groundworks associated with the development.*
 - a. *The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary,*
 - b. *Should archaeological remains be identified during archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service, regarding appropriate mitigation.*

- c. The developer shall facilitate the archaeologist in recording any remains identified.*
 - d. Any further archaeological mitigation requirements specified by the planning authority following consultation with the Department, shall be complied with by the developer.*
- 3. The Construction Environment Management Plan (CEMP) shall include the location of all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 10 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.*
- 4. The planning authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.*

Reason: *To ensure the continued preservation (either in situ or by record of places, caves sites, features or other objects of archaeological interest.)*

Following receipt of the submission, the project archaeologist specialist, Aisling Collins Archaeology Services (ACAS), has reviewed the submission by the Department. In this regard, we note that should An Coimisiún be minded to apply the recommended condition in relation to archaeology items that the Applicant is willing to comply with same.

Accordingly, we believe we have responded to the submission by Department of Housing, Local Government and Heritage in full. Should further engagement be required with the Department, we are happy to facilitate same.

2.2 TRANSPORT INFRASTRUCTURE IRELAND (TII)

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by Transport Infrastructure Ireland (TII) on the 22nd of May, 2026. The submission received from TII, which was in letter format, was relatively brief and noted two observations from the prescribed body.

Firstly, TII noted that the proposed development shall be undertaken strictly in accordance with the recommendations of the Traffic and Transport Assessment. Any recommendations arising should be incorporated as Conditions on the Permission, if granted. The developer should be advised that any additional works required as a result of the Assessment should be funded by the developer.

In addition, TII noted that future Luas, Metro and Bus Connects alignments are a matter for the National Transport Authority (NTA).

Following receipt of the submission, the project traffic and roads consultant, Egis Consulting Engineers, has reviewed the submission by TII. Both observations are noted with no further response required at this stage.

Accordingly, we believe we have responded to the submission by TII in full. Should further engagement be required with TII, we are happy to facilitate same.

2.3 UISCE ÉIREANN

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by Uisce Éireann on the 23rd of June, 2026. The submission received from Uisce Éireann, which was in letter format, was also relatively brief and noted two observations from the prescribed body.

2.3.1 Service Connections

In respect of service connections, Uisce Éireann refer to the Pre-Connection Enquiry submitted with the planning application documentation and can confirm that a Confirmation of Feasibility [CDS25004860] was issued to the applicant in September 2025. This advises that both water and wastewater connections are feasible without infrastructure upgrade by Uisce Éireann.

2.3.2 Diversions

This section of the submission noted that a diversion may not be required at this stage; however, it remains the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section where proposals cannot achieve the required separation distances from existing public infrastructure or where there is a potential impact on Uisce Éireann assets.

Accordingly, to ensure adequate provision and protection of water and wastewater facilities, Uisce Éireann recommended the following conditions of planning;

- 1. "The applicant shall enter into a connection agreement with Uisce Eireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.*
- 2. There shall be no build over of public infrastructure from these proposals. Separation distances as per Uisce Eireann's Standards Codes & Practices shall be achieved where public infrastructure is in situ within and/or adjacent to site boundaries*
- 3. The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this Development shall comply with the Uisce Eireann Connections and Developer Services Standard Details and Codes of Practice."*



Following receipt of the submission, the project engineering and site services consultant, Egis Consulting Engineers, has reviewed the submission by Uisce Éireann and acknowledge the observations with no further response required at this stage.

Accordingly, we believe we have responded to the submission by Uisce Éireann in full. Should further engagement be required with Uisce Éireann, we are happy to facilitate same.

2.4 HEALTH SERVICE EXECUTIVE (HSE)

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by the HSE on the 4th of June, 2026. The submission received from the HSE is noted as having been reviewed by the following departments of the HSE in advance of submission –

- National Environmental Health Service
- Emergency Planning
- National Capital Estates Office
- Direction of National Health Protections
- Regional Executive Officer/Integrated Health Care Manager.

The submission includes a brief summary of the proposed development and notes the sensitive receptors, as identified in the EIAR, as being schools, childcare facilities, healthcare/community facilities, residences and others.

In this regard, the HSE notes;

“It is important that all parameters outlined in the EIA are considered from the sensitive receptor’s location. The choice of the location and number of the monitoring points should take into consideration the main sensitive receptors from where demolition/construction is active. Public concerns have been recorded into the EIA report. All complaints should be fully investigated in this regards and reasonable satisfactory mitigation measures implemented promptly.”

The submission then extracts relevant sections of the EIAR in relation to mitigation of impacts arising from dust, surface and ground water quality considerations, noise and pest control. All mitigation measures outlined in the EIAR will be adhered to in this regard.

The submission then notes that the proposed walking loop ways associated with the development will contribute towards meeting the objectives of the *Healthy Ireland Framework 2013-2025*. The Environmental Health Service recommends that, where possible, pedestrian areas should be accessible to wheelchairs, pushchairs and mobility vehicles in order that all ages and all levels of mobility can access the improved recreational amenities. We can confirm in this regard that all public loop ways will be accessible to users of all ages and levels of mobility.

In addition, the submission notes that consideration should be given to the provision of food on the premise and the additional café. In this regard the HSE have advised that the applicant contacts the local Environmental Health Officer to review at the planning stage. In this regard, we are satisfied that the operator will do so prior to commencement of operation.



Accordingly, we believe we have responded to the submission by the HSE in full. Should further engagement be required with the HSE, we are happy to facilitate same.

3.0 SUBMISSIONS FROM MEMBERS OF THE PUBLIC

As noted above, 2 no. submissions were received from members of the public in relation to the proposed development. These are assessed individually below and overleaf.

3.1 CATHERINE O DONNELL

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by Catherine O'Donnell on the 22nd of June, 2026. This submission is noted under several separate headings, which include;

- Safety
- Traffic chaos during and after building
- Parking Spaces
- Difficult to quantify actual increase in facilities for such a Negative Environmental and Infrastructural impact
- Biodiversity - Loss of Flora and Fauna
- Loss of Ancient Structures
- Treatment Criteria
- More suited to a site with easy access from major roads and alternative choices of rail or Luas transport

These are discussed in turn below.

3.1.1 Safety

The submission outlines concerns that the entrance to the hospital adjoins a creche and a school facility. It notes that the road is *'one of the most congested in the county and this area in particular is already gridlocked and dangerous,'* and notes particular concern in relation to safety of children from a roads hazard perspective.

In this regard, this concern has been reviewed by the project engineer, Egis Consulting Engineers. Egis have noted that safe access and egress have been carefully considered with an appropriately designed entrance and traffic improvement measures discussed and proposed with SDCC. Traffic volumes and access have been analysed with the junction at Chapel Hill noted as a bottleneck. A revised junction which will address this junction has been proposed and discussed with South Dublin County Council.

A construction management plan has been submitted noting that deliveries and site access will be restricted during traffic and school peak times.

3.1.2 Traffic Chaos During And After Building

The submission again notes concern with trip generation by hospital staff and service users. The submission notes;

“An AI inquiry gave 1,200 -1,800 daily vehicle trips for a 200 bed hospital dealing with mental health, with peak traffic occurring at shift changes and visiting times. This figure includes the heavy goods vehicles required to supply a hospital of this size.”

In this regard, this concern has been reviewed by the project engineer, Egis Consulting Engineers. Egis have noted

We refer to the submitted Traffic and Transport Assessment which provided actual estimates of trip generation, based on knowledge of how the hospital currently operates. These are real world figures based on traffic counting rather than generalised AI inquiries. We also refer to the proposed improvement works to the Chapel Hill/Lucan Road junction and the appended *Letter of Comfort* received from SDCC regarding same.

3.1.3 Parking Spaces

The submission notes that the development will be car dependent and accordingly the car parking facilities proposed are inadequate in their opinion.

In this regard, this concern has been reviewed by the project engineer, Egis Consulting Engineers. Egis have noted parking provision is in line with all guidance and standards and has been reviewed and agreed in collaboration with SDCC.

3.1.4 Difficult To Quantify Actual Increase In Facilities For Such A Negative Environmental And Infrastructural Impact

The submission then notes a libellous statement;

“The business plan for the owners of the two hospitals appears to be to sell the more valuable St Patrick’s Hospital at Steeven’s Lane, James’s St when the new hospital is up and running. In that case the area would suffer massive environmental and infrastructural damage for no real increase in treatment potential.”

The Governors of St. Patrick’s Hospital refute this statement in its entirety. The submission contains speculative commentary regarding the operational plans of a site that is unrelated to, and does not form part of, the proposed development currently under consideration. As such, these remarks are not material planning considerations and are of no relevance to the determination of this application. It is therefore respectfully requested that An Coimisiún disregard this statement and attach no weight to it in its assessment of the proposal.

3.1.5 Biodiversity - Loss Of Flora And Fauna

The submission notes;

“Proposed planting of new trees and hedgerows will not ameliorate the ecological damage done to flora and fauna which have naturally built up in the ancient woodland of the area over centuries. This includes a colony of bats in the area to be built on/reburshed.”

This statement has been reviewed by the project environmental and ecological specialist, JBA Consulting. In response, the specialist noted that the EIAR addresses the constraints linked to the proposed development resulting in the loss of an area of woodland habitat within the Liffey Valley proposed Natural Heritage Area (pNHA). This impact has been fully assessed within the Biodiversity Chapter of the EIAR. Mitigation measures such as translocation of the pNHA woodland to the northeastern corner of the site are described in Chapter 14 (Schedule of Mitigation) and Chapter 4 Section 4.6.4.1 of the EIAR.

As discussed previously, the proposed development incorporates significant ecological mitigation measures, including compensatory woodland planting, native tree and hedgerow planting, the creation of a new wetland/woodland habitat in the northeastern corner of the site and long-term landscape management plans. These measures have been designed to strengthen the overall ecological function of the site and provide enhanced habitat connectivity. For example, as detailed in Section 6 of the Landscape Design Report from DFLA, the proposed development includes:

- The planting of approximately 540 no. new standard and multi-stemmed trees, compensates for the 57 no. trees lost for the proposed development. This additional tree planting of mainly native species, coupled with the inclusion of bare-root woodland species and native hedging will have a positive impact on biodiversity.
- The planting of 2,600 no. native tree whips.
- The planting of 1,640 sqm of native hedge planting.

The proposed development, however, does require the removal of 57 no. trees as included in Section 7.1 of the Arboricultural Impact Assessment (AIA) conducted by Arborcare. Included in this figure are the forty-seven trees which will be directly impacted on by the development and will have to be removed to facilitate the design. The majority of these trees are of low-quality category C trees. Of the forty-seven trees to be removed to accommodate the proposed design, these consist of 0 no. category A trees, 1 no. category B and 46 no. category C trees and 0 no. category U trees (Table 1 in the AIA). A further 10 no. trees are recommended for removal based on their poor condition. These consist of 2 category C and eight category U (Table 1a in the AIA).

The AIA concluded that the arboricultural impact of the proposed scheme is low as the majority of the trees to be removed are of low quality. Given the high tree population of the entire site, the removal of these trees will not negatively impact the surrounding characteristics or amenity of the site. This AIA formed the basis of the approach to the Landscape Masterplan prepared by DLFA.

Included in the tree removal required, it should be noted that within the pNHA boundary, there are a total of 11 no. trees to be removed, which has been minimised through design. 9 no. of these are ash, with ash dieback disease at various stages, and two are already dead elm trees. It is also proposed to actively manage and enhance this existing woodland resource to ensure its future viability and longevity.

The SDCC Green Space Factor for the proposed development is valued at 7.3 up from site's current score of 0.62 (7.0 is the minimum required). The Green Space Factor *'is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area.'* The additional tree planting of mainly native species, coupled with the inclusion of bare-root woodland and native hedging will provide an enhancement for biodiversity and have a positive impact on a range of species, as detailed in Section 7 of the Landscape Design Report, prepared by DFLA submitted with the planning application.

The EIAR also includes specific mitigation measures for bats. These include the retention of key commuting routes where practicable, the implementation of a sensitive lighting strategy to minimise disturbance, and the installation of a minimum of six bat boxes (EIAR Chapter 4, Section 4.6.4.6).

3.1.6 Loss Of Ancient Structures

The submission then notes that the boundary wall to the Lucan Road will have to be relocated which is *'loss of ancient structures,'* notwithstanding that this wall is not ancient. In this regard, the project conservation specialist, Carrig Conservation, notes;

"Having considered the submission, the objection somewhat overstates the extent to which the existing wall survives as historic fabric. As noted within our Architectural Heritage Impact Assessment, a substantial portion of the wall is demonstrably of modern construction rather than original eighteenth- or nineteenth-century masonry. This is evidenced by the clear construction break between the historic and reconstructed sections, the marked change in masonry character, and the incorporation of modern construction detailing, including rubber expansion joints. These features clearly indicate that significant reconstruction has taken place in relatively recent times.

In addition to the physical evidence, comparison of the available historic mapping on the Historic Environment Viewer suggests that the present alignment of this section of the boundary wall does not precisely correspond with its earlier historic alignment. Whilst historic mapping should not be interpreted as being survey accurate by modern standards, there is a discernible change in the curvature of the southern boundary over successive editions. Significantly, the section of wall where this apparent straightening occurs corresponds with the portion exhibiting clear evidence of modern reconstruction. Taken together, these observations strongly suggest that this section of the boundary was reconstructed following an earlier road realignment, rather than representing the uninterrupted survival of the original eighteenth-century wall.

It is important to distinguish between the significance of the historic alignment and that of the surviving historic fabric. The available evidence indicates that both the alignment and the fabric have already been subject to alteration. The separately proposed road upgrade works, which do not form part of this proposal, would

therefore affect a boundary which has already undergone previous relocation and reconstruction, rather than resulting in the loss of an intact eighteenth-century structure in its original form and location. In that regard, the proposal represents a balancing exercise between conserving the surviving heritage significance of the boundary and addressing an existing deficiency within the public road network.

Finally, whilst the wall undoubtedly contributes to an understanding of the historic extent of the former Perry/Vesey demesne, I note that it is not identified as an individual structure within the National Inventory of Architectural Heritage. Its principal significance therefore appears to derive from its contribution to the historic demesne boundary, rather than from the survival of an extensive body of original historic fabric."

Out of the abundance of clarity, the relocation of this wall is not required explicitly for this project, rather this wall relocation is to facilitate wider planned road upgrades to be undertaken by TII/SDCC. Those works are subject to separate process.

The concerns raised in relation to traffic congestion and road safety elsewhere in their submission are noted. However, there is an inherent contradiction in objecting to the removal of the existing wall while also highlighting concerns regarding traffic flow and road safety. The road upgrade works have been designed specifically to address these issues, and the demolition and relocation of the wall is a necessary and unavoidable component of those works. This application merely facilitates those works at a later date, while sensitively addressing the design requirements. Accordingly, the concerns raised must be considered in the context of the infrastructure required to achieve the sought-after local improvements.

3.1.7 Treatment Criteria

The submission then notes the following;

"It should be noted when considering this planning proposal that treatment in this hospital will be based on ability to pay for treatment or ability to pay for medical insurance to cover care costs. In the case of cover by insurance, treatment will depend on the length of stay covered by medical insurance. As mental health issues are often linked to poverty, patients most needing this hospital are unlikely to be admitted there for treatment."

The submission raises issues relating to healthcare funding, insurance coverage and admission policies of St. Patrick's Hospital facilities. These matters are wholly unrelated to the land use and development issues that fall to be considered under the Planning and Development Acts. The planning system is concerned with the appropriateness of the proposed development, its design, environmental effects and compliance with planning policy, rather than the operational or commercial arrangements of a healthcare provider.

The comments are speculative, unsupported by evidence and are not material to the assessment of the proposed development. It is therefore respectfully requested that An Coimisiún disregard these assertions and afford them no weight in its consideration of the submission.

3.1.8 More Suited To A Site With Easy Access From Major Roads And Alternative Choices Of Rail Or Luas Transport

The submission then concludes under the above heading, noting that the site is not suited to a *'busy, gridlocked junction'* which renders the site *'unsuitable.'*

In this regard, this concern has been reviewed by the project engineer, Egis Consulting Engineers. Egis have noted that the proposed improvements to the junction are designed to alleviate the gridlocked nature of the junction.

Accordingly, we believe we have responded to the submission by the Catherine O'Donnell in full. Should further engagement be required with the Catherine O'Donnell, we are happy to facilitate same.

3.2 EILEEN DENNEHY

A submission was issued to An Coimisiún Pleanála in respect of the proposed development by Eileen Dennehy on the 21st of June, 2026. This submission is noted under two separate headings, which include;

- Nature and Biodiversity
- Traffic and Safety

These are discussed in turn below.

3.2.1 Nature and Biodiversity

While the submission acknowledges the planting of new trees and plants on site, they believe that the removal of mature trees, disturbance, loss of woodland is unacceptable. They believe that this will impact on badgers, pine martens, birds and bats.

This statement has been reviewed by the project environmental and ecological specialist, JBA Consulting. In response, the specialist noted that the EIAR addresses the constraints linked to the proposed development resulting in the loss of an area of woodland habitat within the Liffey Valley proposed Natural Heritage Area (pNHA). This impact has been fully assessed within the Biodiversity Chapter of the EIAR and the area impact has been reduced as much as possible through design iteration and consideration of alternatives. Mitigation measures such as translocation of the pNHA woodland to the northeastern corner of the site are described in Chapter 14 (Schedule of Mitigation) and Chapter 4 Section 4.6.4.1 of the EIAR.

As discussed previously, the proposed development incorporates significant ecological mitigation measures, including compensatory woodland planting, native tree and hedgerow planting, the creation of a new wetland/woodland habitat in the northeastern corner of the site and long-term landscape management plans. These measures have been designed to strengthen the overall ecological function of the site and provide enhanced habitat connectivity. As noted above but stated again for completeness, as detailed in Section 6 of the Landscape Design Report from DFLA, the proposed development includes:



- The planting of approximately 540 no. new standard and multi-stemmed trees, compensates for the 57 no. trees lost for the proposed development. This additional tree planting of mainly native species, coupled with the inclusion of bare-root woodland species and native hedging will have a positive impact on biodiversity.
- The planting of 2,600 no. native tree whips.
- The planting of 1,640 sqm of native hedge planting.

As noted above, the proposed development, however, does require the removal of 57 no. trees as included in Section 7.1 of the Arboricultural Impact Assessment (AIA) conducted by Arborcare. Included in this figure are the forty-seven trees which will be directly impacted on by the development and will have to be removed to facilitate the design. The majority of these trees are of low-quality category C trees. Of the forty-seven trees to be removed to accommodate the proposed design, these consist of 0 no. category A trees, 1 no. category B and 46 no. category C trees and 0 no. category U trees (Table 1 in the AIA). A further 10 trees are recommended for removal based on their poor condition. These consist of 2 category C and eight category U (Table 1a in the AIA).

The AIA concluded that the arboricultural impact of the proposed scheme is low as the majority of the trees to be removed are of low quality. Given the high tree population of the entire site, the removal of these trees will not negatively impact the surrounding characteristics or amenity of the site.

The SDCC Green Space Factor for the proposed development is valued at 7.3 up from site's current score of 0.62 (7.0 is the minimum required). The additional tree planting of mainly native species, coupled with the inclusion of bare-root woodland and native hedging will provide an enhancement for biodiversity and have a positive impact on a range of species, as detailed in Section 7 of the Landscape Design Report, prepared by DFLA. Again, the submitted EIAR also includes specific mitigation measures for bats. These include the retention of key commuting routes where practicable, the implementation of a sensitive lighting strategy to minimise disturbance, and the installation of a minimum of six bat boxes (EIAR Chapter 4, Section 4.6.4.6). Additional mitigation measures for birds, pine martens, hedgehogs, and bees are included in Chapter 4 Section 4.6.4 of the EIAR.

3.2.2 Traffic and Safety

The submission notes;

"The area is served by a fairly narrow gridlocked road, with little or no options for widening."

Notwithstanding this, road upgrade works are planned by the TII for the Lucan Road, with widening of these roads facilitated through relocation of the boundary wall to the Lucan Road in this application. In this regard, I refer to the attached letter of comfort by SDCC which outlines agreement regarding the planned improvements, this is appended  accordingly.

The submission then continues;

“On the left of the proposed development, on an already dangerous and under strain from traffic bend in a one lane road, on a hill, is a pre-school. On the right of the proposed development, is a large primary school. Even apart from school opening and closing times, this area is grid locked with traffic at all times of the day, from very early morning to late in the evenings. The addition of a large hospital to this strained dynamic would be extremely detrimental to the safety of school children, the local residents and businesses.”

The submission then notes;

“The development plan states that extensive consultations have been held with the National Transport Authority, South Dublin County Council and Bus Connects. For anyone living in this area this ring very hollow. At present we have a situation when buses pass passengers, already full, or do not arrive at all even though the App shows they are present. A relation witnessed a man break down in tears at the bus stop a few weeks ago. Two buses had passed full and the third bus could only take three passengers. He was not one of them, and through sobs said he had been told his job was lost if he was late again. He had been standing at the bus stop for over an hour. This is the situation the residents of Lucan find themselves in, and the addition of a large hospital can only make things even more problematic.”

In this regard we note that the applicant does not have control of bus scheduling or availability in Lucan and this is a matter for Dublin Bus. In addition, the applicant is also not responsible for content of the Development Plan, which lies with SDCC. We note, however, that staff and service users of the hospital will get to the hospital in a number of different ways once operational.

The submission then concludes that the site is ‘totally unsuitable’ and;

“Lucan has experienced over development in the past few decades, with two major SDZs located in our little town. Infrastructure and services have not kept pace with this over development leading to poor quality of life for the residents. We have lost huge swathes of green space and the area of St. Edmundsbury is one of the few natural lungs of protection we have left. I feel this hospital should not be build[sic] in this area of natural beauty and biodiversity.”

In this regard, we note that the proposed development is on the site of an existing hospital facility already serving the local and national population. The response to tree loss and impact on biodiversity is detailed above already in this Response. The submission then states;

“It will be a private hospital, only available to those who can afford it, so of no benefit to a vast amount of Lucan people. It has been said to me that some public beds will be available, alas through personal experience with St. Patricks Hospital I have found this is on paper only and not a reality”

The comments raised concern healthcare funding, access to treatment and personal experiences of service provision. Such matters are outside the scope of the planning process, which is concerned with the proper planning and sustainable development of land rather than the operational, administrative or funding arrangements of healthcare providers. Furthermore, the submission makes unsupported assumptions regarding the utilisation of existing services by residents of Lucan.



These assertions are neither evidence-based nor material to the assessment of the proposed development. It is therefore respectfully submitted that An Coimisiún should attach no weight to these comments in its consideration of the application. Accordingly, we believe we have responded to the submission by the Eileen Dennehy in full. Should further engagement be required with the Eileen Dennehy, we are happy to facilitate same.

4.0 CONCLUSION

Having reviewed the submissions received in respect of the application, Tom Phillips + Associates, on behalf of the Applicant, has provided commentary on the matters raised where considered appropriate. It is respectfully submitted that the issues identified do not give rise to any concerns that would materially alter the planning assessment of the proposed development or undermine the conclusions reached within the application documentation, nor would it require a request for further information in this regard.

The planning application, together with the accompanying Environmental Impact Assessment Report, AA screening and supporting technical documentation, provides a comprehensive and robust basis upon which An Coimisiún Pleanála can complete its assessment of the proposed Strategic Infrastructure Development.

The provision of a mental health facility at this location represents an important and much-needed investment in healthcare infrastructure. The proposal relates to the expansion of an existing, established operation and will contribute to addressing the growing demand for mental health services, both nationally and within the region, where access to appropriate treatment and support facilities remains a significant concern. In this context, the development will deliver a clear social and community benefit through the enhancement of essential healthcare services.

Having regard to the significant need for such facilities, the established nature of the use on the site, and the sensitive and comprehensive manner in which the proposed development has been designed, it is respectfully submitted that the application merits favourable consideration by An Coimisiún Pleanála.

Notwithstanding the above, should An Coimisiún Pleanála consider that any further clarification or additional information would assist its assessment, the Applicant would be pleased to provide such information in a timely manner. If you have any queries in relation to any aspect of this letter, please do not hesitate to contact me.

Yours Sincerely,



Órla Casey
Associate
Tom Phillips + Associates



Appendix A – Letter of Comfort From SDCC A/Director Land Use Transportation and Planning

Connecting You to



Garry Flood,
Egis
Energy and Sustainable Cities
Director Structures Ireland

Date: 12/02/2025

Letter of Comfort - Proposed Strategic Infrastructure Development application St. Patrick's Hospital, Lucan

Dear Mr. Flood,

SDCC wish to inform the client of the proposed St. Patrick's hospital development that it is broadly supportive of the intended planning application subject to the several additional planning conditions outlined below being attached to any decision on planning permission.

Extensive discussions have taken place between South Dublin County Council and the applicant to resolve the traffic congestion concerns related to the proposed planning application.

The existing Lucan Road /Chapel Hill Road junction is overcapacity at peak travel times.

While it is accepted that much of the congestion is existing background traffic, the Council remained concerned about adding additional traffic to the overloaded junction without upgrading the junction to allow the proposed development to take place.

Therefore, the Council proposes that the applicant contribute a proportion of the costs of the junction upgrade.

Additional Roads and Traffic Conditions:

1. The developer shall pay a special contribution to the planning authority in respect of specific exceptional public infrastructure costs for facilities that will benefit this development within the area of the planning authority, that is provided, or intended to be provided by or on behalf of the authority, in accordance with Section 48 (2) c of the Planning and Development Acts 2000 (as amended).
Accordingly, the developer shall pay a special contribution of €150,000 to South Dublin County Council as part of the financial cost required to install a fully signalised junction at the Lucan Road / Chapel Hill Road junction.



2. South Dublin County Council shall build the signalised junction at the Lucan Road /Chapel Hill junction within an agreed timeframe.
3. The applicant shall sell the required additional land to South Dublin County Council necessary to build the fully signalised junction. The applicants engineering consultants (Egis), have produced a drawing outlining the setback required for the proposed signalised junction with cycle and pedestrian linkages included. The value of the land ceded to the Council shall be taken off the €150,000 contribution. The value of the land ceded will be calculated by an independent chartered land valuer.
4. The applicant shall, as part of their works, demolish part of the existing stone boundary wall and rebuild it set back sufficiently, to allow the building of the signalised junction.

SDCC would appreciate an acknowledgement of this letter and confirmation that the client is happy with the proposed additional conditions to be applied to the forthcoming SID application.

Yours sincerely,



Date: 14/02/2025

Michael McAdam
A/Director Land Use Transportation and Planning
South Dublin County Council
County Hall
Tallaght