

Planning Statement – Strategic Infrastructure Development

St. Edmundsbury Hospital, Lucan, Co.
Dublin



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1.0 INTRODUCTION

1.1 Proposed Development

The Governors of St. Patrick's Hospital¹ (herein referred to as 'the Applicant') has retained Tom Phillips + Associates,² in association with a multidisciplinary team to submit this planning application in respect of the development of a proposed new Mental Health Hospital Facility and associated facilities, in the grounds of the existing St. Edmundsbury Hospital site in Lucan, Co. Dublin.

As detailed within this *Report*, the proposed Strategic Infrastructure Development is comprised of a new mental healthcare campus at St Edmundsbury Hospital, Lucan, on a site of approximately 8.10 hectares containing a number of Protected Structures. In summary, the scheme provides for the comprehensive redevelopment and intensification of the existing hospital lands to deliver a modern, purpose-built mental health facility with a total gross floor area of circa 19,252 sq m. This includes a new 200-bed adult inpatient facility arranged in a one to two storey block within the historic walled garden, alongside a replacement 14-bed adolescent unit. The layout has been informed by the retention and integration of key heritage features, including historic walls and structures, with the creation of a series of internal courtyards and therapeutic external spaces.

The proposal also encompasses the demolition of a number of obsolete structures and the sensitive refurbishment and adaptive reuse of buildings within the historic farmyard complex to provide ancillary services, including a consultancy suite, café, maintenance facilities and energy centre. Works to Protected Structures are a central component of the scheme and include repair, alteration and partial reconstruction.

The development incorporates a wide range of supporting infrastructure, including patient and staff facilities, car and cycle parking, internal roads, utilities, and landscaping. Significant emphasis is placed on the provision of open space, with both public and secure patient gardens, as well as new walking and cycling routes.

Access arrangements to the site are to be reconfigured, including the removal of existing buildings at the entrance and the set-back of the boundary wall along Lucan Road to facilitate future junction upgrades by the local authority.

The scheme is supported by comprehensive environmental and engineering works, including drainage, SuDS, renewable energy measures, and ecological interventions, including works within the Liffey Valley pNHA.

Overall, the development represents a substantial investment in healthcare infrastructure, delivering a consolidated and modernised mental health campus while seeking to respect the architectural and historic character of the site.

¹ St. Patrick's University Hospital, James's Street, Dublin 8. SPMHS is a registered charity under RCN: 20000370)

² 80 Harcourt Street, Dublin 2



Figure 1.1: Image illustrating the indicative subject site boundary (Image Source: Google Maps, 2026, annotated by TPA, 2026).

The proposal seeks to help address the current shortfall nationally in mental healthcare infrastructure nationally in a manner that accords with policy at all levels, ensuring protection of amenity of all kinds and emphasising the refurbishment and repurposing of historic elements to support hospital operation and improvement.

This application is to be submitted following confirmation received from An Coimisiún Pleanála that the proposed development does constitute Strategic Infrastructure Development, within the meaning of Section 37A of the *Planning and Development Act (2000)*, as amended, as noted in correspondence dated 7th January 2026 (ACP Ref. ABP-322151-25). Therefore this application for proposed development is to be made directly to the Commission under Section 37E of the *Act*.

In this regard, we note that the Commission requested that 12 no. prescribed bodies would be notified of the application for the proposed development. Please find copies of these notifications enclosed with the planning application documentation accordingly.

1.2 Design Intent

St Patrick's Mental Health Services (SPMHS) is Ireland's largest independent provider of mental healthcare. The organisation operates across two primary campuses: St Patrick's University Hospital on James' Street in Dublin 8 and St Patrick's Hospital Lucan, Co. Dublin. In addition, SPMHS delivers a range of community-based mental health services through its network of Dean Clinics, located throughout the country.

St Patrick's University Hospital has been based in the heart of Dublin since its foundation in 1746, established using a bequest from Jonathan Swift following his death in 1745. Since its inception, SPMHS has been committed to providing the highest quality mental healthcare to the people of Ireland, continuing Swift's visionary legacy.



Each year, SPMHS delivers acute inpatient care to over 2,300 adults across its hospitals in Dublin 8 and Lucan, and provides tailored mental healthcare and support to over 900 service users in the comfort of their own home through its Homecare service. The organisation also delivers more than 17,000 day-care group therapy sessions and approximately 16,000 individual community-based treatment and care sessions through the Dean Clinics. The services provided cover a broad spectrum of mental health conditions, including Addictions and Dual Diagnoses, Anxiety Disorders, Bipolar and other Mood Disorders, Eating Disorders, Depression, and Psychoses. Specialist services are also offered for young adults, adolescents, and older adults

In response to evolving needs, many services are now delivered via Technology-Mediated Interventions (TMI), enabling individuals to access care remotely from their own homes, either individually or in group settings. This has significantly expanded the reach and flexibility of SPMHS's services, promoting accessibility and continuity of care.

The Board and Management of SPMHS are committed to consolidating its services into a national centre of excellence for mental healthcare, research, and education. As part of its commitment to continuing Swift's vision, SPMHS now seeks to redevelop and modernise its physical infrastructure to meet future demands. This redevelopment represents the next stage in the evolution of SPMHS, aiming to increase capacity, enhance service delivery, and transform the physical environment for the benefit of service users, staff, and the wider community.

We consider that the proposed development is of national importance in planning terms, having regard to its scale and the limited availability of comparable, purpose-built facilities elsewhere in the country. The site therefore represents a unique and strategically important location for the delivery of this form of development. Further details in support of this position are set out in the accompanying Architectural Design Statement prepared by TOT Architects.

1.3 Project Team

This Planning Application has been prepared by Tom Phillips + Associates (Planning Consultants) in conjunction with the following multidisciplinary design team:

- TOT Architects (Architecture);
- Egis Consulting Engineers (Engineering);
- DFLA Landscape Architects (Landscaping);
- JBA Consulting Ireland (Environmental and EIAR);
- Carrig Conservation International (Conservation).

In addition, a number of subconsultants have provided advice to support the design team in relation to ecology, arboriculture and other areas of speciality. This has helped inform the design team accordingly.

1.4 Engagement with An Coimisiún Pleanála (ACP)

The proposed development, in accordance with Section 182E of the *Planning and Development Acts 2000 (as amended)*, has had the benefit of two pre-planning consultation meetings with ACP regarding the proposed development. Following this a formal Closure Assessment was issued by ACP. This is outlined further below.

1.4.1 ABP-322151-25 (1st July 2025)

The initial pre-planning meeting was held with An Coimisiún Pleanála on Tuesday, 3rd June 2025, via MS Teams. The key matters discussed at the meeting included the the historic use of the lands and to confirm whether the grounds of the facility would be accessible to the public. The integration of Protected Structures within the proposed development was also highlighted as a critical consideration. In addition, the zoning of the site and consideration of material contravention arising was discussed.

It was further emphasised that the EIAR accompanying the application should comprehensively assess and clearly set out the potential impacts arising from the proposed development. In addition, a robust and well-evidenced planning justification for the proposed use will be required.

1.4.2 ABP-322151-25 (1st September 2025)

Subsequent to the constructive dialogue at the initial meeting, and revisions made to the proposal as a result, a second pre-planning meeting was held with An Coimisiún Pleanála on Monday, 1st September 2025, via MS Teams.

The key matters discussed at the meeting, in the context of zoning and potential material contravention, included the preliminary view that, while no formal determination had been made, the proposed development constituted Strategic Infrastructure Development. Consideration of whether the proposed development may materially contravene the *South Dublin County Development Plan 2022–2028* was also discussed.

The need to undertake meaningful public consultation in advance of lodging the application was also highlighted. In addition, the Commission advised that, where impacts on Protected Structures are significant, the application must demonstrate exceptional circumstances to justify such interventions.

Given the scale of the proposed works and the sensitivity of the site, particular emphasis was placed on the requirement for a robust and detailed assessment of biodiversity within the EIAR.

Overall, the two pre-application meetings with An Coimisiún Pleanála have provided a valuable forum for engagement, informing and refining the evolution of the proposed development. This has been complemented by ongoing and consistent dialogue with the local authority for a number of years, as outlined in the enclosed documentation.



1.5 Public Consultation

It is important to note that the applicant has undertaken a comprehensive public consultation process. This process was undertaken to inform staff, neighbouring residents, the wider public and adjoining landowners of the nature and merits of the proposed development. Consultation events occurred as follows:

- An in-person presentation to the Senior Management Team of St Patrick's Mental Health Services on 14th October;
- An in-person presentation to staff of St Patrick's Mental Health Services on 15th October;
- An online presentation to the staff of St Patrick's Mental Health Services on 23rd October;
- An in-person presentation to the Board of Management of St. Andrews National School on 6th November.

Finally, this process included a public consultation event held on 18th November 2025 at St. Edmundsbury House, Lucan, to present the proposals for the development of a new Mental Health Hospital and associated facilities on the St. Edmundsbury campus to the public.

The purpose of the consultation was to provide both public representatives and members of the community with a clear understanding of the project vision, its key components, and the planning process ahead. The event was structured in two parts: a dedicated session for public representatives from 3:00 pm to 4:00 pm, followed by a public session from 4:00 pm to 5:00 pm. This structure ensured that elected representatives had the opportunity for focused engagement before the wider public discussions commenced. This is outlined further in the enclosed Environmental Impact Assessment Report (EIAR), prepared by JBA Consulting.

1.6 SDCC CONSULTATION

A comprehensive consultation process has been undertaken by the Applicant and its design team with South Dublin County Council (SDCC) from May 2023 to March 2025 under S247 Ref. PP061/23. This process involved detailed engagement with the Planning Authority's planning, heritage, conservation, drainage, parks, and roads departments to resolve key issues in advance of the SID application. It also included site visits by Council representatives where required. Overall, all Council departments have expressed support for the proposed development and this was secured in advance of proceeding to consultation with ACP.

In particular, engagement with the Roads Department, as detailed further in the enclosed Egis submission, has led to agreement on the need for junction improvement works in response to existing traffic conditions. While these works will be brought forward separately by SDCC and/or Transport Infrastructure Ireland, the design and land requirements to accommodate them have been incorporated into the current proposal. This is enclosed as Appendix A.



It should be noted that ongoing engagement with SDCC has been undertaken for a considerable period preceding 2022, relating to the applicant's wider aspirations for the development and expansion of the existing facilities at St. Edmundsbury Hospital. This engagement included submissions and representations made as part of the preparation and formulation of the Development Plan, which was formally adopted in 2022.

In this context, it is noted that the adopted Development Plan includes a site-specific local objective for the lands, intended to facilitate the future expansion of the long-established existing use. The relevance and application of this objective to the current proposals are considered further within this report and the accompanying documentation.

2.0 SITE LOCATION AND SURROUNDING CONTEXT

The subject application site (c. 8.10 Ha) is located in Lucan, Co. Dublin. The plot of land contains the aforementioned premises of St. Edmundsbury Hospital, associated buildings, and surrounding grounds. There are a number of derelict outhouses/farm buildings on site. A large proportion of the site is currently undeveloped, there are a number of ruinous farm buildings on site and dense natural tree cover.

2.1 Immediate Context

The subject land's northern boundary consists of several mature trees, separating the site from active agricultural farmlands. To the east of the subject site is St. Andrew's National School, a number of derelict buildings, tilled farmland, woodland cover, and the Hermitage Golf Club. The southern boundary of the subject site is bounded by the Lucan Road, adjacent to this, there are predominantly residential land uses consisting of detached and semi-detached houses. To the west, there is substantial natural woodland and grasslands, separating the subject site from the River Liffey. To the southwest, the site is immediately adjoined by the Lucan East Substation and the Village Montessori Pre-School.



Figure 2.1 Site Location Map. Subject site indicative of red outline. [Source: Google Maps. Cropped and annotated by TPA, 2026]

2.2 Surrounding Context

The subject site is located on the northern boundary of Lucan, c. 760m from Main Street. The subject lands are well connected, with the Lucan Road (R835) providing direct access from the N4. To the north, there are a number of land uses, including amenities, heritage, and leisure facilities. Situated here are the Luttrellstown Castle Resort, Mount Joseph Fort Lucan, a golf course, and significant woodland coverage.

To the east, there are a number of recreational and leisure services, such as 2 No. golf clubs, a cricket club, and sports grounds. Situated here are also commercial and essential services such as the Hermitage Medical Centre, a secondary school, and office uses.

To the west, there is an industrial park along the Lower Lucan Road, and further west, residential development within Laraghcon.



Figure 2.2 Wider Context Map. Subject site indicative of red outline. [Source: myplan.ie, cropped and annotated by TPA, 2026].

To the south, Lucan Road provides access to the subject site. The adjacent St. Andrew's National School (220 No. pupils) utilises a separate access to the Lucan Road. To the west, the adjoining preschool and substation are serviced from Chapel Hill Road. The subject site is well serviced with public transport, there are 6 No. bus stops on Lucan Road, facilitating a number of routes.

2.3 Connectivity

The proposed development is situated to benefit from a good quality existing bus services provided by two bus operators (i.e. Dublin Bus and Airport Hopper). The closest bus stop is just located outside the proposed development on Lucan Road westbound as shown overleaf. Another bus stop is located on Lucan Road eastbound with approximately 120 metres (approximately 1.5-minute walk) from the proposed development as shown overleaf. Also, the C3 bus route provides a link to Leixlip Louisa Bridge Station, which is located approximately 6 kilometres (approximately 30-minute cycle) from the proposed development. In addition, the L54 bus route provides a link to Red Cow LUAS (red line), which is located approximately 11 kilometres (approximately 55-minute cycle) from the proposed development.



Figure 2.3 – Bus Stop Locations [Source: Egis Traffic and Transport Assessment, extracted by TPA 2026]

The BusConnects Dublin Programme comprises a series of integrated initiatives, including the delivery of 12 Core Bus Corridor schemes, together with the phased implementation of the Dublin Network Redesign Project, enhanced bus stops and shelters, simplified fares, next generation ticketing and transition to a zero-emission fleet. As part of this programme, a number of improved and redesigned bus services have been introduced in the vicinity of the proposed development. Of particular relevance to the subject site is Phase 2 of the Dublin Network Redesign, which was implemented on 28 November 2021 and introduced the C-Spine routes (C1, C2, C3 and C4), together with Route 52, a number of peak-only routes including X25, X26, X27, X28, X30, X31 and X32, and a number of local routes including L51, L52, L53, L54, L58 and L59. Two night-time routes, C5 and C6, were also introduced as part of this phase. These services improve public transport accessibility in the wider area of the proposed development, including along Lucan Road to the south of the site. In particular, the C3 and C4 routes form part of the C-Spine, providing enhanced connectivity between the outer western suburbs and Dublin City Centre, while the L54 local route improves access to surrounding residential areas and onward connections to the Red Cow Luas stop. The X30, X31 and X32 peak-time routes further enhance commuter accessibility during peak periods.

The train stations in adjacent to the proposed development are Adamstown, Clondalkin Fonthill, Clonsilla, Leixlip Confey and Leixlip Louisa Bridge Stations as shown in Figure 2.8 of the enclosed Traffic and Transport Assessment prepared by Egis, with the train stations with the feeder bus to the proposed development are illustrated in Table 2.2. of the enclosed Report. The Red Line LUAS stop of Red Cow is located approximately 11 kilometres (approximately 55-minute cycle) to the southeast of the Site. Also, the L54 bus route provides a link between the proposed development and Red Cow LUAS stop. According to the GDA Transport Strategy 2022-2042, it is proposed to introduce a Luas Lucan, which will run from Lucan to the city centre via Liffey Valley Town Centre and Ballyfermot. New line will be built from Lucan (Newcastle Road) to Blackhorse, where it links to the Luas Red Line.

Cycle and other transportation links are explored in the enclosed Traffic and Transport Assessment, including mobility management provisions, prepared by Egis, enclosed with this application.

It is submitted that the locational characteristics of the site, that being of its location near key population centres, as well as frequent public transport services and proximity to national roads, reflect favourably for the development of this nature, with the proposal being able provide best practise mental healthcare within an easily accessible location. The location, through its proximity to national road infrastructure and population centres, ensures that patients can be brought to the Hospital with immediacy if required on short notice. Public transport services ensure patients, staff, and visitors can visit the Hospital without creating any undue pressure on the surrounding road infrastructure.

2.4 The Proposed Development Constitutes Strategic Infrastructure Development

The rationale for the proposed development to be considered a Strategic Infrastructure Development is outlined below. As noted above, this was confirmed through engagement with An Coimisiún Pleanála.

2.5 Strategic Infrastructure Provisions of the Planning and Development Acts 2000 (As Amended)

The *Planning and Development (Strategic Infrastructure) Act (2006)* introduced a new procedure for prospective applications for Strategic Infrastructure Development, whereby an applicant for permission must make that application directly to An Coimisiún Pleanála (under Section 37E) where two pre-conditions are met. The statutory pre-conditions are as follows:

I. "Pursuant to section 37A(1) of the 2006 Act, the application for permission must be for a development specified in the Seventh Schedule; and if so

II. The proposed development must fall within at least one of the paragraphs of section 37A(2)."

With regard to the above, in terms of the latter, the proposed development does meet the criteria established in section 37A(2) of the Acts to qualify as 'Strategic Infrastructure Development':

a. Strategic economic or social importance to the State or the Region.	✓
b. Contributes substantially to the fulfilment of any of the objectives in the National Spatial Strategy ^s or in any Regional Planning Guidelines.	✓
c. Significant effect on the area of more than one planning authority.	✗

The proposed development falls within the developments specified in the Seventh Schedule. The Seventh Schedule of the *Planning Acts* sets out the types of development that are considered to be SID under s.37 A/B.

This refers to:

“Health Infrastructure

*4. Development comprising the following: A health care facility (other than a development which is predominantly for the purposes of providing care services (within the meaning of section 3 of the Nursing Homes Support Scheme Act 2009)) which, **whether or not the facility is intended to form part of another health care facility, shall provide in-patient services and shall have not fewer than 100 beds in order to so provide**”. [Our Emphasis].*

The proposed development, as part of its proposal, includes more than the above specified threshold and therefore it is our opinion, and that of ACP, that the scheme constitutes a Strategic Infrastructure Development. This is confirmed in correspondence dated 7th January 2026 (ACP Ref. ABP-322151-25). Therefore, this application for proposed development is to be made directly to the Commission under Section 37E of the Act.

In this regard we have also assessed the proposed development, which we believe is compliant with the relevant national, regional and local planning policy. However, should ACP consider the proposed development is indeed in material contravention of the development plan, we have had regard to Section 37(2)(b) of the Planning and Development Act 2000 where:

1. the proposed development is strategic in nature (Section 37(2)(b)(i));
2. there were conflicting objectives in the development plan (Section 37(2)(b)(ii));
3. permission should be granted having regard to national and regional policy (Section 37(2)(b) (iii)); and
4. permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan (Section 37(2)(b)(iv)).

In this regard we believe the proposed development, which is for a nationally important healthcare facility should be granted in this regard.

2.6 The Proposed Development is Strategic in Nature

It is submitted that the proposed development is inherently strategic in nature, having regard to its scale, function and national importance. The development comprises a purpose-built mental health facility of significant capacity, including a 200-bed adult inpatient unit and associated adolescent services, representing a substantial investment in critical healthcare infrastructure. As outlined in the accompanying documentation, the proposal has been confirmed by An Coimisiún Pleanála as constituting Strategic Infrastructure Development.

The proposal will deliver a facility of regional and national importance, addressing a well-documented shortfall in mental health provision across the State. In this regard, the development is not of a localised or ancillary nature, but rather forms part of the strategic healthcare network, serving a wide catchment extending beyond the immediate area. The evidence provided demonstrates that a significant proportion of service users travel from across Dublin and nationally to access existing services.

Furthermore, the consolidation and expansion of services on a single campus will facilitate the delivery of a centre of excellence in mental healthcare, aligned with Government policy and investment priorities. The scale, complexity and societal importance of the development clearly distinguish it as strategic infrastructure, thereby satisfying the requirements of Section 37(2)(b)(i).

The proposed development will provide essential care to patients in the region and wider state, hence holding significant social importance. The Irish Health Care System is currently experiencing immense strain, and the need for adequate, efficient services is at an all-time high. Research conducted by St. Patrick's Mental Health Services has shown that mental health services are in the highest demand from areas within Dublin County and nationally. Records from St. Patrick's University Hospital, SPUH, Willow Grove Adolescent Unit, and St. Edmundsbury House show that c. 80% of patients utilising inpatient services are travelling from Dublin County and other areas of the country. This is outlined further in the enclosed design statement, prepared by TOT Architects.

The proposed development will also be of significant economic benefit, being certain to create a significant number of on-site jobs, alongside ancillary jobs development through servicing the site.

2.7 There Were Conflicting Objectives In The Development Plan (Section 37(2)(B)(li))

As discussed with ACP during pre-planning discussions, it is acknowledged that the zoning framework applicable to the subject lands may be considered to give rise to a degree of tension between competing policy objectives. The lands for the entirety of the site were requested to be updated as part of the Draft Development Plan process prior to the publication of the current plan, adopted in 2022. In this regard we note that SDCC were provided with, at that stage, the draft site masterplan for the development of the wider site. SDCC decided ultimately to provide a specific local objective to facilitate the expansion and intensification of the long-established institutional use at St Edmundsbury.

In this regard, it is submitted that the Development Plan does not present a singular or unequivocal policy position, but rather reflects a balancing exercise between supporting existing institutional uses and responding to broader development pressures. The existence of a site-specific objective supporting the hospital's expansion is of particular significance and demonstrates a clear policy intent to accommodate development of this nature.

Furthermore, the Applicant has engaged extensively with South Dublin County Council and has satisfied the requirement to prepare and agree a masterplan framework for the development of the site. This process has ensured that the proposed development is properly integrated with the wider landholding and aligns with the strategic planning of the area.

In light of the above, it is considered that any perceived material contravention arises in the context of competing and, at times, conflicting objectives within the Development Plan itself. The proposed development appropriately reconciles these objectives by delivering essential healthcare infrastructure while respecting the established use and character of the site.

It should be noted that the issue of potential material contravention was not raised as a concern item by SDCC during the extensive pre application consultation process which was undertaken over a number of years.

2.8 Permission Should Be Granted Having Regard To National And Regional Policy (Section 37(2)(B)(iii))

The proposed development is strongly supported by national and regional planning policy, which consistently emphasises the need to enhance healthcare infrastructure, and in particular mental health services.

At a national level, the National Planning Framework and associated health policy documents identify the provision of accessible, high-quality healthcare as a key priority underpinning sustainable development. The proposal directly responds to these objectives by delivering a modern, fit-for-purpose facility in a highly accessible location within the Dublin Metropolitan Area.

In addition, sectoral strategies such as Sláintecare and Sharing the Vision highlight the urgent requirement to expand capacity, improve service integration and provide specialised facilities for mental healthcare. The proposed development will make a significant contribution in this regard, facilitating both inpatient and community-based models of care within a single campus.

At a regional level, the Regional Spatial and Economic Strategy for the Eastern and Midland Region supports the development of social infrastructure to underpin population growth and promote healthy communities. The proposal aligns with Regional Strategic Outcomes relating to compact growth, urban regeneration and the delivery of essential services.

Accordingly, it is submitted that the proposed development is fully consistent with, and indeed advances, national and regional policy objectives. In circumstances where a material contravention may arise, these policy considerations provide a compelling justification for the grant of permission. This is explored further in this Report.

The proposed development aligns with all relevant policy documents at the national level, including that of the *National Planning Framework – First Revision (2025)*, in particular regarding access to quality healthcare services. Such a development also aids in achieving National Policy Objectives relating to population and employment growth within well-connected population centres and urban areas in proximity to public transport services.

Likewise, the proposed development is in fundamental importance to government policy documents such as the *Programme for Government (2025)*, *Sláintecare 2025+ (2025)* and *Sharing the Vision – Implementation Plan 2025-2027 (2025)* which stress the need to increase mental healthcare services, provide specialised care, and focus efforts not only on the provision of care but also on prevention measures. Each document also recognises that access to health care services is a priority and an essential service in order to ensure the protection of the population's well-being and enjoyment of life.

The proposed development, thus, is in line with the underpinning objectives of relevant national policy; the provision of mental health services often includes ensuring there is the availability for continuation of care over prolonged periods of time. The redevelopment of

St. Edmundsbury includes a range of services that provide a multitude of levels of care, ensuring the patient's well-being throughout their journey of care.

2.8.1 Contribution to Regional Policy Goals (Eastern Region)

The *Regional Spatial and Economic Strategy* (RSES) is a strategic plan spanning over two decades, providing a roadmap to manage planning and economic development to shape the future of the Eastern and Midland Region. The RSES is underpinned by three key principles, focusing on ensuring healthy placemaking by creating places that are attractive to work and live, promoting the quality of people's lives as a top priority. Enhance climate resilience, and to create opportunities to achieve the Region's economic growth.

There are a number of key transport infrastructure investments set out within the *Dublin Metropolitan Area Strategic Plan (MASP)* for the greater area of Dublin. The document outlines proposals for two Strategic Development Corridors to Finglas and Lucan, unlocking long-term capacity and providing connectivity to strategic landbanks.

The proposed development is in line with a number of Regional Strategic Outcomes, such as No. 1 '*Sustainable Settlement Patterns*', geared towards ensuring the sustainable and compact growth of Dublin City as an international city. The development and enhancement of the subject site satisfy RSO No. 2 '*Compact Growth and Urban Regeneration*', as the proposed aims to restore a number of existing buildings and utilise the site to its full capacity. The development also contributes to RSO No. 4 '*Healthy Communities*' and other objectives, which acknowledge that there are gaps in the Region's current healthcare infrastructure, ensuring that there are adequate primary care, acute care, and social care services.

To summarise, much of the policies contained within the RSES and MASP, emulate those laid out in national policy. The need for the expansion and intensification of healthcare infrastructure is consistently noted within regional policy applicable to this development. Indeed, policies on growth and employment (particularly employment-led population growth) highlight how the proposed development has the likely potential to align with regional policies.

The *South Dublin County Development Plan (2022-2028)* contains several policies that relate to the development of the wider Lucan area and the St. Edmundsbury site, which this proposed development will help realise. The subject site is within the *Masterplan NCBH7 SLO 2*, the Plan provides the provision for the future development of the Mental Health Facility on site. It is an objective of the *Plan* to ensure the expansion of the hospital can be achieved while ensuring the preservation of and proper regard to the surrounding environment and existing character.

The Development Plan states that it is an objective of South Dublin County Council to facilitate the development of the St. Edmundsbury site. The Council has provided the scope to assess and work together with the owners of St. Edmundsbury to expand the existing hospital facility on site.



The subject proposal therefore aligns with a number of aspirations, policies and objectives of the *South Dublin County Development Plan (2022-2028)* as detailed further within this Report.

2.9 Permission Should Be Granted Having Regard To The Pattern Of Development And Permissions In The Area (Section 37(2)(B)(iv))

The established pattern of development in the area supports the proposed use and scale of development. The subject site has a long-standing history of institutional and healthcare use, with St Edmundsbury operating as part of a wider hospital campus for a considerable period. The proposed development represents a logical continuation and intensification of this established use, rather than the introduction of a new or incompatible land use.

The planning history of the site demonstrates a consistent approach to facilitating the ongoing operation and improvement of the hospital, with permissions granted for a range of developments over time. This reflects an acceptance in principle of healthcare uses at this location.

In the wider area, there exists a mix of land uses, including residential, educational, recreational and healthcare facilities, indicative of a suburban context capable of accommodating a development of this nature. The proximity to existing services, public transport and strategic road infrastructure further supports the suitability of the site.

It is also relevant to note that adjoining lands with similar zoning are currently subject to reconsideration for alternative uses, including residential development. This evolving context underscores the dynamic nature of land use planning in the area. Notwithstanding this, the subject site remains uniquely suited to the provision of healthcare infrastructure, given its established use, spatial characteristics and integration with existing hospital operations.

In this context, the proposed development is consistent with the prevailing pattern of development and represents an appropriate and sustainable use of the lands. It is therefore submitted that Section 37(2)(b)(iv) is satisfied.

Having regard to the foregoing, it is submitted that, in the event that An Coimisiún Pleanála determines that the proposed development materially contravenes the Development Plan, there are clear and robust grounds under Section 37(2)(b) to justify the grant of permission. The development is strategic, supported by national and regional policy, arises in the context of competing Development Plan objectives, and is consistent with the established pattern of development in the area. This is explored further in this Report and in the enclosed documentation accordingly.

3.0 RATIONALE FOR THE PROPOSED DEVELOPMENT

The following subsections will detail as follows:

- The demand for the proposed development in light of the increasing prevalence of mental health issues, as well as the current shortfall in appropriate mental healthcare facilities, and
- How the proposed development accords with the historic use of the wider site.

3.1 The Demand For The Proposed Development

Mental health has become increasingly recognised as a critical component of global health and development. This is reflected in the inclusion of mental health in the World Health Organisation's Sustainable Development Goals.³ Despite this growing awareness, mental health conditions continue to rise worldwide. Depression is now one of the leading causes of disability across the globe. There has been a 13% increase in mental health conditions and substance use disorders over the past decade, largely due to demographic changes. Today, mental health conditions account for 1 in 5 years lived with disability.⁴

Among children and adolescents, approximately 20% are affected by mental health conditions, with suicide now the fourth leading cause of death among 15- to 29-year-olds. In post-conflict settings, around one in five people are estimated to have a mental health condition.⁵

Specifically concerning Ireland, mental health disorders are proven to be relatively higher compared to international estimates⁶. Ireland ranks 3rd highest in Europe for mental health difficulties, with 19% of the population affected⁷. Mental health difficulties are already widespread in Ireland, with a 2022 study finding that 42.5% of Irish adults met the criteria for at least one mental health disorder⁸.

In turn, due to a lack of access to mental healthcare, concerningly, studies have shown that Irish people are increasingly turning to social media and AI tools regarding mental healthcare information.⁹

This is reflected in secondary-school-aged adolescents in Ireland reported more mental health problems since the Covid-19 lockdowns, including an increase in suicide attempts, compared to previous years, according to new findings published by researchers at RCSI University of Medicine and Health Sciences.¹⁰

³ [World Health Organisation Overview on Mental Health](#)

⁴ [World Health Organisation Overview on Mental Health](#)

⁵ [World Health Organisation Overview on Mental Health](#)

⁶ [State of Ireland's mental health: findings from a nationally representative survey](#)

⁷ [Depaul and Mental Health Reform Call for Urgent Action to Address Mental Health Crisis](#)

⁸ [Depaul and Mental Health Reform Call for Urgent Action to Address Mental Health Crisis](#)

⁹ [Irish people struggling more than ever with mental health challenges](#)

¹⁰ [RCSI research identifies worrying trends in mental health of adolescents in Ireland](#)

Therefore, significant investment is needed across all areas in order to increase awareness and reduce stigma, to expand access to quality care and effective treatments, and to fund research into improved therapies and innovative service models. Improving mental health requires cross-sectoral collaboration beyond the healthcare system. Key determinants include education, employment, housing, transportation, environmental quality, and access to social protection. However, the health sector can play a leading role through integrated promotion and prevention efforts and by fostering coordination among sectors. SPMHS believes that high-quality mental healthcare must be grounded in a human rights ethos.

Mental health is a fundamental human right. Everyone, regardless of who they are or where they live, has the right to the highest attainable standard of mental health. This right encompasses:

- Protection from mental health risks;
- Access to available, accessible, acceptable, and good quality care, and
- The right to liberty, independence, and full inclusion in the community.

The facilities provided at St. Edmundsbury is built upon a recovery-oriented, human rights-based approach, empowering individuals to guide their own treatment and recovery. Those experiencing mental health difficulties are equal citizens and must be treated with respect, dignity, and without discrimination. They have the right to full inclusion, autonomy in decision-making, and access to care in the least restrictive and least intrusive settings appropriate to their needs. Treatment must be individually tailored, evidence-based, and delivered by qualified multidisciplinary teams.

SPMHS actively advocates for a society where all mental health care, prevention strategies, and promotional efforts, especially for children and adults, are grounded in human rights and aligned with key international conventions. The organisation works to advance the rights of people experiencing mental health difficulties, reduce stigma, enhance public understanding, and contribute meaningfully to policy development through consultation and advocacy.

In turn, as detailed within Section 6 of this *Report*, policy at all levels reflects this need for increased investment in, and provision of, healthcare infrastructure. Specifically the provision of mental healthcare infrastructure is highlighted within national, regional and local policy from policy documents such as the *Programme for Government (2025)* and the *Revised National Planning Framework (2025)*, to the *Eastern & Midland Regional Assembly - Regional Spatial and Economic Strategy (2019-2031)* and *South Dublin County Development Plan (2022-2028)*.

3.2 The Proposed Development Accords With The Historic Use of The Site

The proposed development fully accords with the historical use of all lands contained within the 8.10 ha site. In this regard, our Design Team have conducted extensive historical research with Carrig Conservation International with respect to the historical uses of these lands. This research was mainly focused on:

- Available planning history for the subject site as per South Dublin County Council records.
- Maps of the subject site contained within historical censuses and what information they show when studied both individually and in chronological order.
- Writings from these times (19th and 20th centuries mainly) specifically addressing both the role and function of the hospital facilities present on this land in these times.
- Writings concerning those who managed the hospital historically, including their recorded treatment methods, writings, records of professional meetings they chaired, and obituaries.
- Protected structure status of walls surrounding this garden/farm area, and the reasons for such.

This research demonstrates that the hospital and its wider landholding constitute a single, cohesive entity and should not be considered in isolation. Collectively, these lands have historically functioned as an integrated unit in support of patient care and well-being. In particular, the walled garden and the associated fields and landscaped grounds, while originally part of the demesne predating the hospital's establishment, appear to have maintained a functional relationship with the hospital over a substantial period of its operational history.

The development has been carefully designed to respect the character of the site and surrounding area, while delivering enhanced healthcare provision in a manner consistent with the stated aims of the *Development Plan*. The proposal reinforces the long-established institutional use of the site and represents a logical continuation of its permitted function, in accordance with the guiding policy framework and the objectives set out under the relevant SLO.

Matters concerning non-conforming use are specifically addressed under Section 12.2.1 (vi) of the *South Dublin County Development Plan 2022–2028*, which recognises the continued use of premises for purposes which do not conform with the zoning objective, provided the use was legally established prior to the adoption of the Plan. The Plan allows for the reasonable intensification or improvement of such uses, subject to proper planning and sustainable development considerations. In this regard, the subject site has historically operated as a healthcare facility, and its continued use, along with the proposed expansion and enhancement of services, can be considered consistent with this principle. The proposed development does not introduce a materially different use but rather represents a logical and policy-aligned evolution of an established and long-standing community-based healthcare use. The intensification of such uses and the impact of the same are assessed in broad terms in this Report. Accordingly, the proposal does not conflict with the overarching land use zoning objective, in our opinion, and falls within the scope of acceptable development as defined under non-conforming use provisions.



3.2.1 Historical Mapping

As further detailed within the accompanying *Report* prepared by Carrig Conservation International, available historical maps and Census records, when read in tandem with historical written records, support the following conclusions:

- The ‘walled garden’, its fields and gardens contained within, were historically part of the original demesne, prior to the opening of the hospital, but seemed to be clearly linked to its operation throughout a significant time period after.
- Forestry was purposefully grown between these areas, but with paths directly linking the hospital and gardens/fields being purposefully erected between them in order to link these areas through the forest.
- The buildings erected bordering the walled garden area were of farm outbuilding nature rather than of any permanent residence.
- Upon St. Edmundsbury House and demesne being acquired as a branch of St. Patrick’s Hospital, James Street, in 1898, there is evidence that supports that those who had a Medical Director or equivalent position status within the hospital also had responsibility for management of these farmlands/gardens.
- Certain Medical Directors of the hospital espoused a psychiatric philosophy which supported works such as farming and gardening as part of the well-being for those in their care.
- Writings from people during the 20th century appear to view these lands as a ‘branch hospital and farm’.
- In light of the above evidence, the subject proposed development constitutes a non-conforming use under the current Development Plan, in light of its established use, prior to the *Planning Act (1964)*, being intrinsically linked to the hospital, its operation and the care it provided.

The following section provides an overview of available historical maps in chronological order, detailing the development of the lands of St. Edmundsbury Hospital.

1772

The first available historical map which details the presence of both the hospital and farm/gardens is recorded within the *Survey of the Estate of Amongdisham Vesey (1772)*.

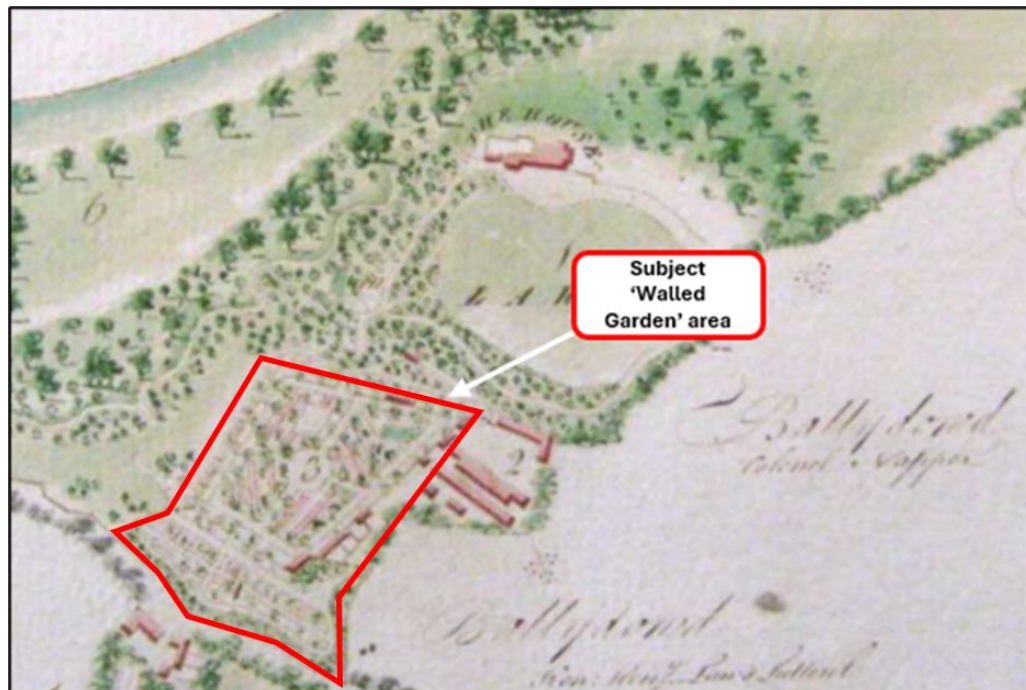


Figure 3.1: Extract from Survey of Estate of Amongdisham Vesey (1772)¹¹(Source: Dublin Historic Maps, 2026).

Upon review and close inspection of these maps, it appears that the main St. Edmundsbury House is present, along with the walled garden area and forestry. It should be noted that there appear to be paths linking the walled garden area (and its fields) to St. Edmundsbury House, which later became the hospital, through the forestry. This shows a link between the lands to the south and St. Edmundsbury House, with the gardens and fields contained within the walled garden forming part of its demesne.

1843

It should be noted that within this map, while the subject forest line is present, again, there are clear and defined paths through from the Hospital (then St. Edmundsbury House) to the lands to the south. These pathways appear to lead to gardens and small-scale agriculture present within the southern portion of the land.

¹¹ [Bernard Scale, Survey of the estate of Agmondisham Vesey \(1772\)](#)

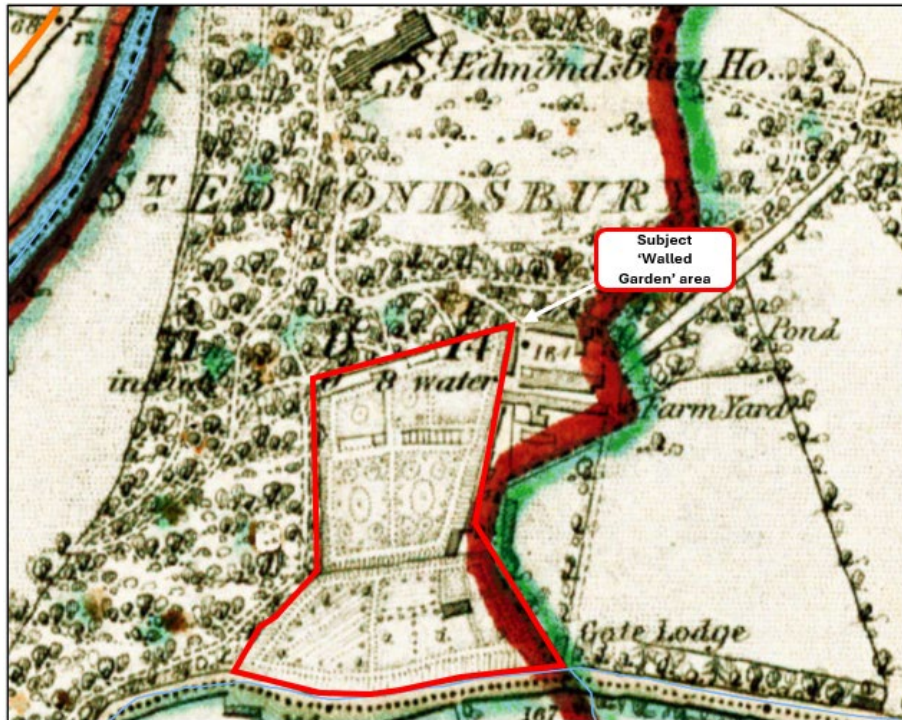


Figure 3.2: Extract from First Edition Six-Inch maps (1843)¹², illustrating the presence of the Hospital, walled garden/farm, increased growth in the forest, and paths made through the forest, linking all.

1912

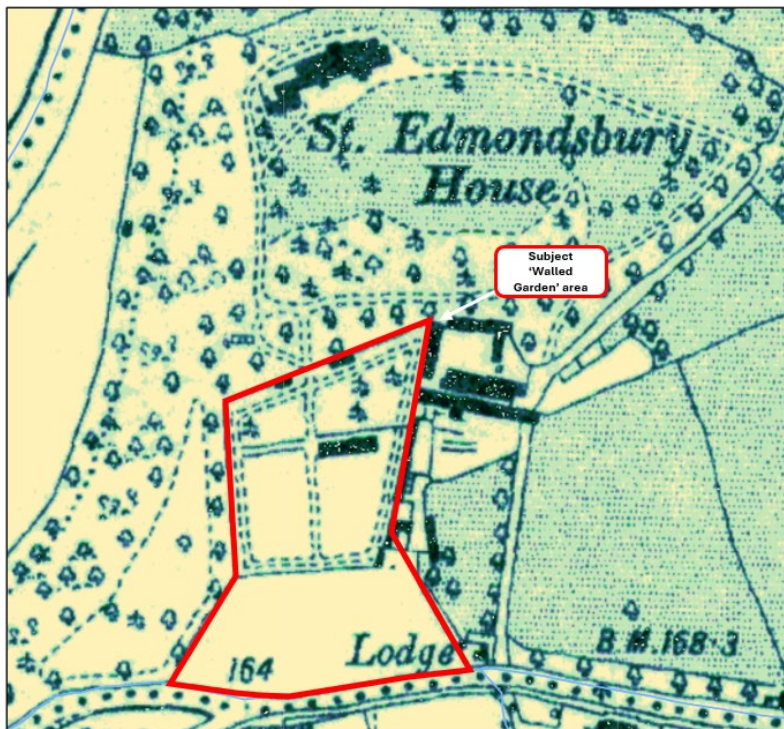


Figure 3.3: Extract from Third Edition Six-Inch maps (1912)¹³.

¹² [First Edition Six Inch maps \(1843\)](#)

¹³ [Third Edition Six Inch Map](#)

This map, dated to 1912 (by now St. Edmundsbury House and its demesne would have been acquired and in use as a hospital for nearly 15 years), further illustrates and strengthens the view of the Design Team that the agricultural/garden use of the southern portion of the lands was linked to the operation of St. Edmundsbury Hospital.

The paths, noted in previous maps throughout the 19th and 18th centuries, which linked the walled garden area (and thus the gardens and fields contained within), to the St. Edmundsbury House, had purposefully been retained through this time period.

It should be noted that trees appear present within a number of the subject plots, indicating a recreational purpose linked to the hospital rather than intensive agriculture (which would, in most likelihood, see these trees being removed).

This map very clearly strengthens the view of the Design Team that the subject lands to the south of the main, which became St. Edmundsbury Hospital, were linked to its usage and were intrinsically linked to the care provided.

1938

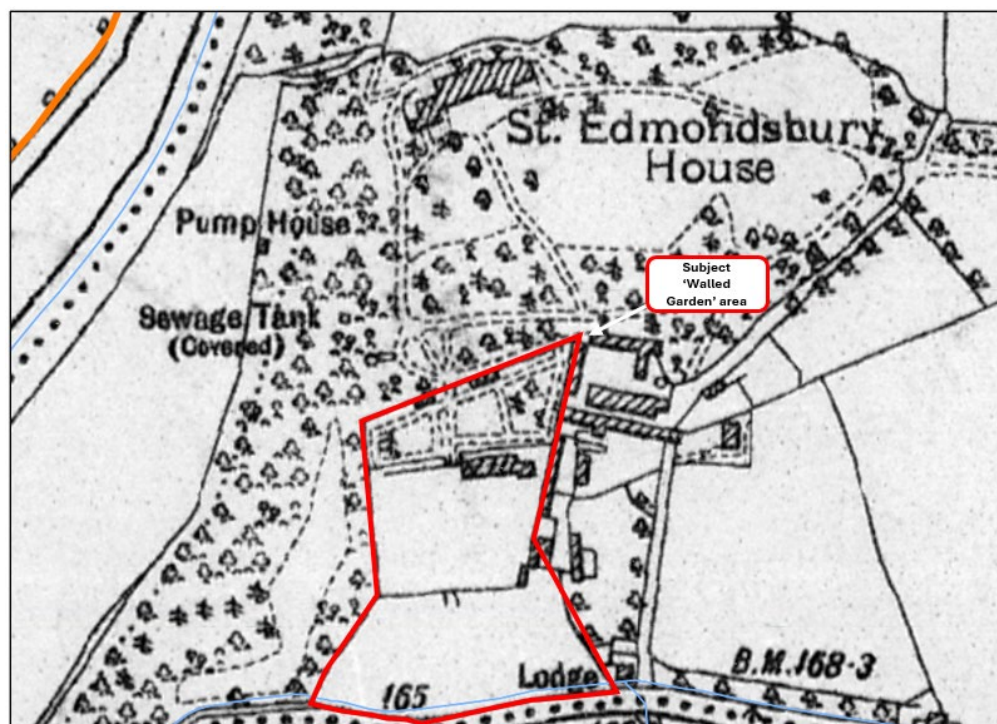


Figure 3.4: Extract from Fourth Edition Six Inch Map (1938)¹⁴.

This map, dated to 1938, illustrates a continued growth in forestry that appears to be purposeful and managed. The subject areas of recreation/agriculture on the southern side of the site are still present and linked through direct paths to the hospital.

14

<https://sdublincoco.maps.arcgis.com/apps/webappviewer/index.html?id=e0c5595b033341dea7661e248d2e9ee9>

Considering these paths, it appears that the hospital is linked to both the forestry and the lands to the south contained within the 'walled gardens'. It is submitted that the above evidence supports the view of the Design Team that the use of these for garden/agricultural purposes is a non-conforming use by virtue of being in existence on 1st October 1964 (that is, prior to planning legislation), and this use was linked to the care given by the hospital.

Present Day

At present, the subject site consists of the hospital, various outbuildings and its campus lands. The walled garden area has been used for agricultural purposes for a period of time; however, as detailed in the sub-sections above, these lands have historically been of use linked to the operation of, and care given by, the hospital.



Figure 3.5: Image over section of the subject site at present, highlighting the walled garden area (Image Source: Google Maps, 2026, annotated by TPA, 2026).



Figure 3.6: Image of St. Edmundsbury Hospital (Image Source: St. Patrick's Mental Health Services¹⁵, 2026).

¹⁵ [St Patrick's Hospital Lucan](#)



Figure 3.7: Image showing an overview of a section of the walled garden and existing farm structures on the grounds of the subject site (Image Source: Carrig Conservation International, 2026).

The subject lands contained within the walled garden are currently undeveloped and in a ruinous condition, have an extended history of being tied to the care provided by the hospital, and so represent a significant opportunity to expand and improve mental health care provision within South Dublin.

3.2.2 Historical Writings

As part of this assessment, Tom Phillips + Associates, in collaboration with Carrig Conservation International, has carried out a comprehensive review of all available digital historical records relating to St. Edmundsbury Hospital and its surrounding grounds. This research includes a detailed examination of sources concerning the hospital's operation, its physical context, and the individuals responsible for its governance since its inception, insofar as they are relevant to the present evaluation.

As detailed within the previous Report, St. Edmundsbury Hospital was founded by Dean Swift in 1745.

Acquisition and Dr Leeper Stewardship

St. Edmundsbury House and demesne were acquired as a branch of St. Patrick's Hospital, James Street, in 1898.

This, however, was not to be. In 1898 the Governors of St. Patrick's Hospital had bought St. Edmundsbury, an estate near Lucan, with the view of using it as an annexe to the Hospital in James's Street, and to it Dr. John Molony was transferred as Medical Superintendent. In January, 1899, Molony's place at St.

Figure 3.8: Extract from Obituary – Richard Robert Leeper¹⁶

Records from a meeting he held in 1904, of the Royal College of Psychiatrists, make clear mentions of the farm and produce resulting from its acquisition.

¹⁶[Obituary - Richard Robert Leeper](#)

1904-J NOTES AND NEWS.

[A NMEETING - cambridge.org](#)

... recent acquisition of the Manor of **St. Edmundsbury** at **Lucan**, we are now provided with a ... vegetables, which come in daily to us from **Lucan**, and our institution is now almost entirely ...

☆ Save  Cite Related articles All 3 versions

Figure 3.9: Extract from Irish Division. *Journal of Mental Science*. 1904;50(208):195-199. doi:10.1192/bjp.50.208.195. ¹⁷

1904-J NOTES AND NEWS.

[A NMEETING - cambridge.org](#)

... **Edmundsbury** at **Lucan**, we are now provided with a more effective ... **farm** and gardens to supply ourselves entirely with milk, meat, and vegetables, which come in daily to us from **Lucan**, ...

☆ Save  Cite Related articles All 3 versions

Figure 3.10: Extract from Irish Division. *Journal of Mental Science*. 1904;50(208):195-199. doi:10.1192/bjp.50.208.195. ¹⁸

1904-J NOTES AND NEWS.

[A NMEETING - cambridge.org](#)

... of the Manor of **St. Edmundsbury** at **Lucan**, we are now provided with a more effective and economically curative machinery. We are enabled by means of our **farm** and gardens to ...

☆ Save  Cite Related articles All 3 versions

Figure 3.11: Extract from Irish Division. *Journal of Mental Science*. 1904;50(208):195-199. doi:10.1192/bjp.50.208.195. ¹⁹

Further to this, his Obituary upon his death in 1942 notes the following:

Richard Robert Leeper

[TPC Kirkpatrick, R Thompson - Journal of Mental Science, 1942 - cambridge.org](#)

... **Edmundsbury**, an estate near **Lucan**, with the view of using it as an annexe to the **Hospital** ... of the **hospital**, and directing with skill and success its large **farm**, he brought ...

☆ Save  Cite Related articles

Figure 3.12: Extract from Kirkpatrick TPC, Thompson R. Richard Robert Leeper. *Journal of Mental Science*. 1942;88(372):480-484. doi:10.1192/bjp.88.372.480²⁰.

Richard Robert Leeper

[TPC Kirkpatrick, R Thompson - Journal of Mental Science, 1942 - cambridge.org](#)

... on a visit to the Branch **Hospital** at **Lucan**. Here he would display the **gardens**, or give the history of the old manor house, or perhaps fix up a rod and let them see his skill on the river. ...

☆ Save  Cite Related articles

Figure 3.13: Extract from Kirkpatrick TPC, Thompson R. Richard Robert Leeper. *Journal of Mental Science*. 1942;88(372):480-484. doi:10.1192/bjp.88.372.480²¹.

¹⁷ [Journal of Mental Science](#)

¹⁸ [Journal of Mental Science](#)

¹⁹ [Journal of Mental Science](#)

²⁰ [Journal of Mental Science](#)

²¹ [Journal of Mental Science](#)

From these examples, it appears that during this time period, the hospital, woods and farm were not separate entities, but rather part of the one enterprise with free access between each. The obituary for Dr Leeper also notes his direction of not just the hospital, but also the farm during this period.

Stewardship of Doctor Moore

The successor of Dr Leeper was Dr Norman Moore, who, from all available information, appears to have favoured more occupational therapy practices such as farming and garden work to aid mental well-being.

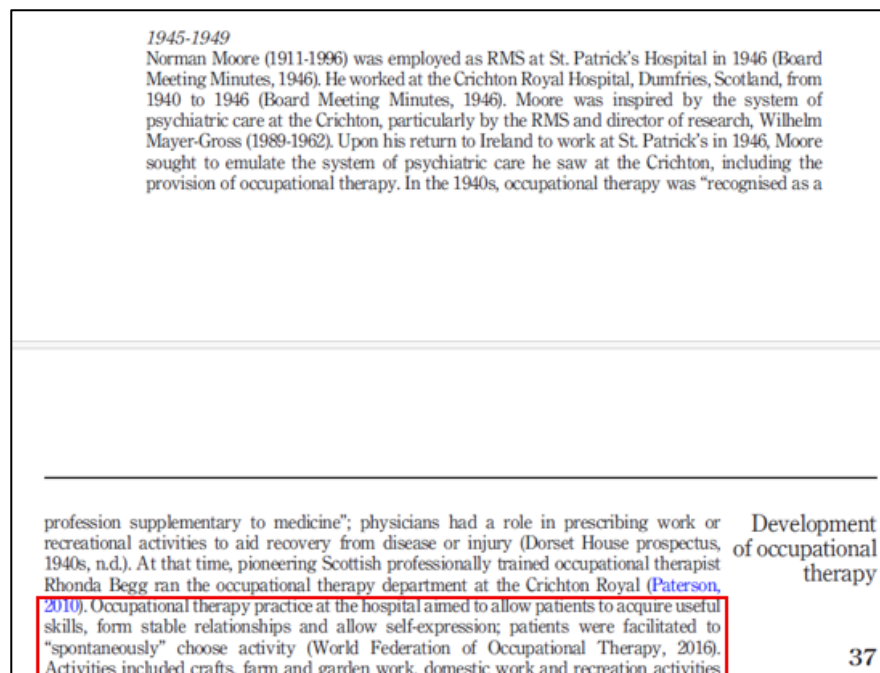


Figure 3.14: Extract from Dunne, B.D., Robinson, K. and Pettigrew, J. (2018), "A case study of the development of occupational therapy at St. Patrick's Hospital, Dublin, 1935-1969", Irish Journal of Occupational Therapy, Vol. 46 No. 1, pp. 31-45. <https://doi.org/10.1108/IJOT-11-2017-0025>²².

3.2.3 Other Documentation and Imagery

The Selected Writings of Maurice O'Connor Drury: On Wittgenstein, Philosophy, Religion and Psychiatry

²² [A case study of the development of occupational therapy at St. Patrick's Hospital Dublin, 1935-1969](#)

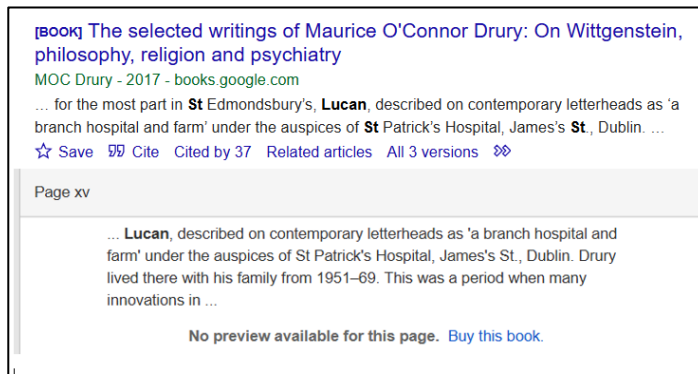


Figure 3.15: Extract from Drury, M.O.C., 2017. *The selected writings of Maurice O'Connor Drury: On Wittgenstein, philosophy, religion and psychiatry*. Bloomsbury Publishing²³.

This extract, from '*The Selected Writings of Maurice O'Connor Drury: On Wittgenstein, philosophy, religion and psychiatry*', is clear in illustrating that St. Edmundsbury was operating as a branch hospital and farm during the 50s and 60s (the book details Drury lived here between 1951-1969).

Irish Photo Archive

This subject image of the farm in 1958, found within the Irish Photo Archive, has a description which reads "*St Edmundsbury is an acute psychiatric unit set in its own grounds just outside the village of Lucan, situated near the M50/N11 interchange*".

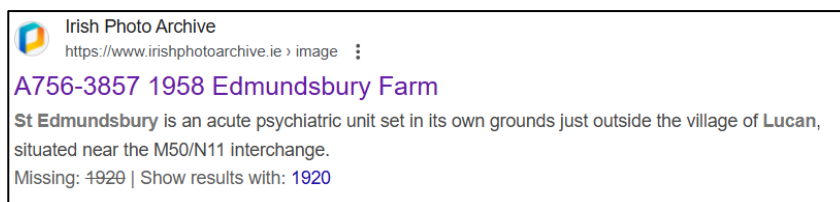


Figure 3.16: Extract from current South Dublin County Development Plan (2022-2028).

²³ [Drury, M.O.C., 2017. The selected writings of Maurice O'Connor Drury: On Wittgenstein, philosophy, religion and psychiatry. Bloomsbury Publishing.](#)



Figure 3.17: Image of St. Edmundsbury farm (Source: Irish Photo Archive, 2065).

Protected Structure Status of Walls Surrounding Garden/Field

Regarding the above historical evidence, it is submitted that the subject lands on the southern side of the site are surrounded by a perimeter wall, which is considered a Protected Structure (RPS Ref. no. 12) within the current *South Dublin Development Plan (2022-2028)*.

012		Walled Garden, Lucan Road, St. Edmundsbury	Walled Garden	Map 01
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Figure 3.18: Extract from Appendix 3A: Record of Protected Structures, of the current South Dublin County Development Plan²⁴ (2022-2028).

It is submitted that the protected status of the ‘Walled Garden’ and other surrounding structures within the southern portion of the lands point to these structures having acquired historical significance through direct links to St. Edmundsbury Hospital. Indeed, it is concluded that it is only understandable that these lands have acquired protected status when the evidence in previous sections is noted.

3.2.4 Research Overview and Implications for the Proposed Development

Tom Phillips + Associates and Carrig Conservation International are of the considered opinion that there is strong evidence to indicate that the entirety of the lands of the land within St. Edmundsbury House and demesne were of use intrinsically linked to the operation of the hospital and so the established use of these lands being linked to the operation of the hospital and the care it provided historically. Further to this, it is submitted that this use was in existence before the establishment of the Planning Act (1964).

²⁴ [Appendix 3A - South Dublin Development Plan \(2022-2028\)](#)

In turn, the subject proposed development of the lands falls into Category 1 (Pre-Existing Use) under the provisions of the current *South Dublin County Development Plan (2022-2028)*. Further to this, the proposed facility would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This will be demonstrated through the assessments that will be completed as part of the planning application process. In turn, the proposed development is considered an appropriate non-confirming use under the provisions of the current Development Plan, in our opinion.

It is submitted that the current proposal seeks to continue and strengthen the longstanding tradition of St. Edmundsbury House and demesne as a place not solely defined by its clinical function as a hospital, but as one that provides recuperation and care within a woodland and natural setting. Historically, the therapeutic value of nature has been recognised as central to healing and recovery, particularly within institutional mental health settings. As outlined in this section, such an approach was evidently endorsed by those responsible for the stewardship and management of these lands over time. The benefits that stem from nature-based practices and their incorporation into mental health are accepted to be proven under academic consensus to lead to improvements in symptoms of depression, anxiety, addictions and positive emotional regulation.

As detailed within the accompanying Proposed Site Plan prepared by TOT Architecture and Landscape Plan prepared by DFLA Architecture, the subject proposal acknowledges this consensus and so sees a clear emphasis on provision, retention and enhancement of amenity areas, woodlands and greenspace in general as part of this project to positively benefit the care of patients within the Hospital.

As is detailed within the Landscape Plan and accompanying particulars submitted by DFLA Architects, it is the intention of this proposal that its design encourages the interaction of patients with nature, encouraging such in the knowledge that engagement with nature through outdoor activities has a significant positive impact on patients' mental and physical health. The proposed development is clear in its intent to build upon both academic consensus in psychiatric care and build upon the established use of these lands in order to provide a standard of care second to none. In turn, the proposed development will align with both the historic uses of its lands and clear proven treatment means regarding the positive effects of such a setting within nature on psychiatric care and healing.

While the Strategic Land Objective (SLO) within the Development Plan is mapped over part of the lands, it is clear that the designation is intended to apply to the hospital lands as a whole and should not be interpreted as applying solely to discrete parcels in isolation. This position is supported by the research presented above, which evidences the longstanding and continuous use of these lands in support of the hospital's function. The lands in question have only recently been physically segregated from the main facility due to concerns relating to the deterioration of existing structures on-site and associated health and safety considerations. In light of this, we consider that the matter has been satisfactorily addressed and that the proposed development is fully consistent with the intent and objectives of the Development Plan.

4.0 PROPOSED DEVELOPMENT

4.1 Description of Development

St. Patrick's Mental Health Service intends to apply for permission for development on this site of c. 8.10 hectares on lands located within Lucan, Dublin. As per the Statutory Notices, the development will consist of the following:

" In accordance with section 37E of the Planning and Development Act 2000, as amended, The Governors of St. Patrick's Hospital, care of Tom Phillips + Associates, 80 Harcourt Street, Dublin 2, gives notice of its intention to make an application to An Coimisiún Pleanála for permission for a period of 10 no. years for the development of the new mental health hospital facility and all ancillary site development, site services, utilities and landscaping works ("the proposed development"), all at the c. 8.10 Ha site, located at St Edmundsbury Hospital, Lucan Road, Lucan, Co. Dublin, K78 NW63 (Protected Structures: RPS Ref. Nos. 003, 008, 012, 013.) The cumulative area of all proposed new and refurbished buildings is c. 19,251.90 sq m. Associated site development works will include the provision of 8,524 sq m public open space facilities, including public walking and cycling facilities.

The proposed development comprises the demolition of an existing single storey 52 no. bed psychiatric ward (c. 1,633.00 sq m), located to the south-west of St. Edmundsbury House (RPS 003), and the construction of a single storey 14 no. bedroom in-patient adolescent mental health facility (c. 1,857.10 sq m) in its place, with façade remediation where the former building connected to St. Edmundsbury House; The demolition of 1 no. storey existing shed (c. 17.90 sq m) to the north-west of St. Edmundsbury House and replacement with 1 no. ESB substation unit building (c. 23.60 sq m). The proposed development includes a new 200 no. bed adult inpatient facility ranging from one to two storeys in height and a total floor area of c. 16,283.20 sq m, with screened plant at roof level. It will be located within the existing walled garden area (RPS 012) and will incorporate the historic walls and bell tower structures (RPS 013.) The facility will be arranged as a single continuous block comprising 7 no. in-patient wards. The form of the building will create 10 no. new internal courtyards at ground floor & 2 no. terraces at first floor (c. 3696.00 sq m in total); with c. 62 lin.m of the north garden wall to be demolished and this stone reincorporated into the proposed hospital structures.

The proposed development also includes for the alteration, refurbishment and conversion of the existing structures within the historic farmyard enclosure (RPS 008), including: coach house building (c. 312.95 sq m) to provide a new consultancy suite (c. 599.50 sq m), including c. 71.5 sq m café; Alteration, conversion and refurbishment of existing barn (c. 183.65 sq m) to form a maintenance facility building and associated offices (c. 374.00 sq m); The demolition of an existing contemporary shed within the historic farm yard (c. 163.75 sq m) and construction of a new single storey energy centre building (c. 114.50 sq m), within the historic farmyard enclosure. In total, c. 210.80 sq m of structures are required to be demolished within the walled garden and farmyard enclosure areas to facilitate the proposed development.

The proposed development also includes the removal and relocation of the existing southern boundary wall to Lucan Road (c. 190 lin.m) (Regional Road Number Ref. R835) set back from the existing boundary to facilitate the future junction improvement works to the Lucan Road and Chapel Hill Junction. The junction upgrade works do not form part of this application and will be carried out by South Dublin County Council. The proposed development also comprises the demolition of the existing 2 no. Dean Clinic buildings (single storey and single storey with dormer level) at the existing entrance to the site via the Lucan Road (c. 221.15 sq m and c. 60 sq m respectively) to facilitate the construction of revised access arrangements and widening of the access to the Lucan Road.

The new mental health facility will provide adult and adolescent in-patient service rooms; Adult and adolescent day services rooms; Patient care services rooms; Patient pharmacy; Laboratories; Staff and patient canteen facilities; Consultant and hospital administration accommodation; Staff welfare facilities; Reconfigured and additional new car and cycle parking facilities (with revised total of 214 no. car parking spaces, 2 no. bus parking spaces and 160 no. secure cycle parking spaces); Signage and wayfinding.

The proposed development also includes private and secure patient gardens (9,982 sq m); Plant and associated tanks; Public lighting; All piped infrastructure and ducting and redirection works; Tree removal, including tree removal within the Proposed Liffey Valley Natural Heritage Area (pNHA - 000128); Redirection and undergrounding of existing overhead power lines from the Lucan East 38KV Substation to the existing hospital facility; Controlled access barriers; 2 no. Secure cycle parking stores total c. 107.10 sq m; EV charging facilities; 3 no. Attenuation tanks; Rainwater harvesting tanks; PVs; SUDs including extensive green roof provision; Boundary treatments, including new boundary treatments and the repair and refurbishment of existing stone boundary walls; Waste marshalling compound storage area; Changes in level and retaining walls; Internal roads and paths, including vehicle set down areas; Site clearance works; Services provision and related ducting, piping and cabling; and all associated site development and excavation works above and below ground. Upon completion, the mental health facility will cumulatively provide 214 no. inpatient beds across the campus, including existing and proposed inpatient beds.

An Environmental Impact Assessment Report has been prepared in respect of the proposed development and accompanies this planning application."



Figure 4.1: Overview of the proposed development (Source: CGI Images from TOT Architects, 2026).



Figure 4.2: CGI image of the proposed development (Source: CGI from TOT Architects, 2026).

4.2 Summary of Development

Table 4.1 provides a summary of the development statistics of the standalone development. Please refer to the *Architectural Drawing Pack* prepared by enclosed in support of this planning application for specific details on the scheme proposed.

Table 4.1: Summary Site Statistics	
Total site area (ha)	8.10 hectares
Total number of beds provided	214
Open space provision	8,524 sq m
Car parking provision	214
Cumulative area of all new and refurbished buildings	19,251.90 sq m
Bicycle parking provision	160

Table 4.1: Summary site statistics.

4.3 Demolition Works

Demolition works are proposed as part of this development as follows:

- The demolition of an existing single storey 52 No. bed psychiatric ward;
- The demolition of 4 No. storey existing shed structures;

- The demolition of sections of the garden wall and structures, and
- The demolition of the existing 2 No. Dean Clinic buildings.

Demolition of an Existing Single Storey 52 No. Bed Psychiatric Ward

To facilitate the proposed development, the removal of the existing 52 No. bed unit on site, built in 1985, is necessary. A single-storey, 14 No. bedroom in-patient adolescent mental health facility will replace it, with façade remediation where the former building connected to St. Edmundsbury House. The bed shortfall caused by this demolition will be offset by an additional 200 No. beds contained within the proposed inpatient mental health facility.

Demolition of 4 No. Existing Shed Structures

The proposed development will require the demolition of 4 No. existing shed structures to the north-west of St. Edmundsbury House and replacement with 1 No. ESB substation unit building. The subject structures, it is submitted, are not of any heritage value.

Demolition of Sections of the Garden Wall and Structures

In order to facilitate the development, the c. 252 sqm in total of both historic garden walls collectively will be demolished. Substantial lengths of the original garden wall are retained and incorporated into the new layout. In this regard, where the new therapy hub slightly overlaps with the historic footprint, a portion of the original wall is carefully dismantled and reconstructed as part of the new building fabric. This approach allows the wall to continue as a visual and material presence while enabling its integration into a new use.

This approach is part of a wider design principle to rather than simply preserve historical elements in isolation; the project integrates them into the new development in meaningful and functional ways.

Demolition of the existing 2 No. Dean Clinic Buildings

The proposed development is also comprised of the demolition of the existing 2 No. Dean Clinic buildings (single storey and single storey with dormer level) at the existing entrance to the site via the Lucan Road (c. 221.15 sqm and c. 60 sqm) to facilitate the construction of revised access arrangements and widening of the access to the Lucan Road.

4.4 Proposed 200 No. Bed Hospital Layout

The proposed building will accommodate:

At Ground Floor:

- Admission;
- Public entrance;
- Training rooms;
- Cafeteria;
- Therapy Hub;

- Pharmacy;
 - ECT;
 - Kitchen and housekeeping facilities, and
 - No. 4 Wards:
 - Eating Disorder Unit, 12 No. Beds
 - Older Age Unit, 32 No. Beds
 - Higher Acuity Unit, 28 No. Beds
 - General Adult Unit, 32 No. Beds
- At First Floor:**
- Directors' offices, and
 - 3 No. General Adult Wards, 32 No. Beds.
- At Second Floor:**
- Plant room.

The Historic Farm Building will house individual therapy rooms for Consultants and a Public Cafe. The Facility Building, located in the Historic Farm courtyard, will accommodate Environmental Services and Facility Maintenance.

The two-storey mental health facility is carefully designed to integrate into its context of low-rise residential buildings, schools to the east and west, and the surrounding natural landscape. Its scale and massing aim to create a calm, familiar environment for the service users while remaining sensitive to the character of the area. The visual impact of the building has been further carefully mitigated through its placement within the site.

Generous planting and green buffers are introduced in the more exposed areas of the site, helping to further integrate the facility into its setting and create a sense of enclosure and privacy for both service users and the surrounding community.

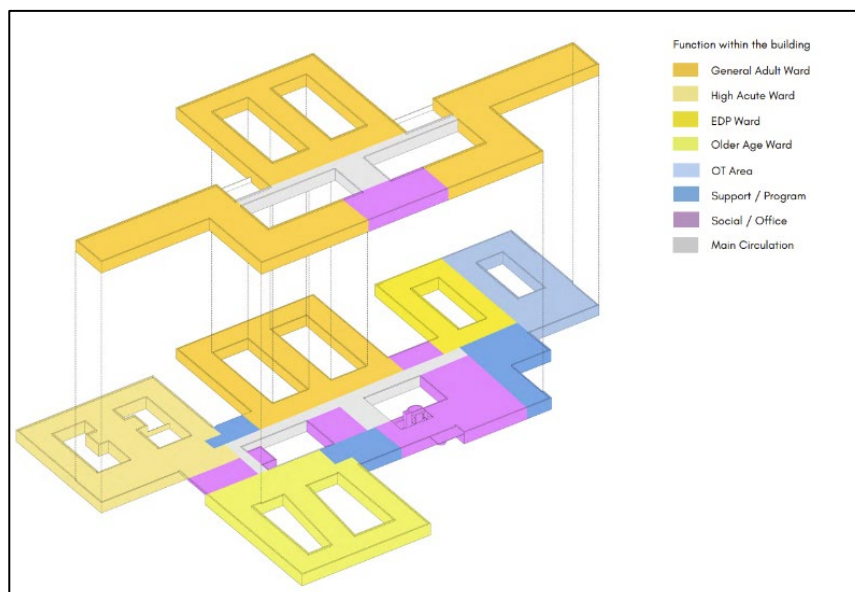


Figure 4.3: Image of the proposed 200 No. bed hospital development (Source: Architectural Design Statement - TOT Architects, 2026).

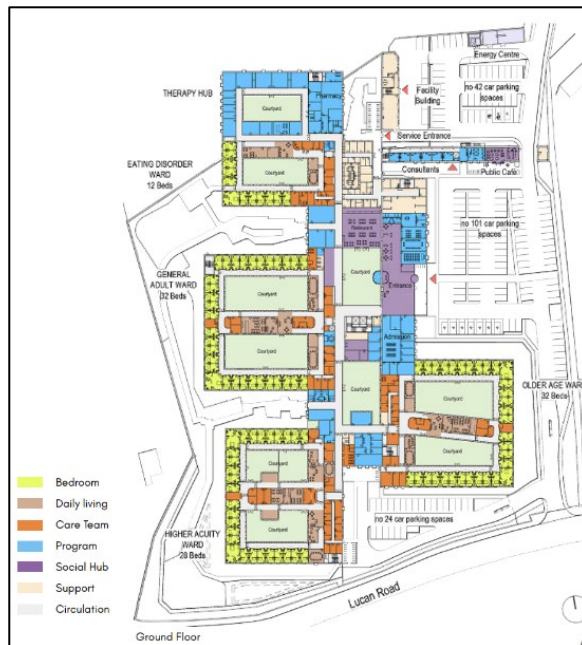


Figure 4.4: Image of the ground floor level of the proposed 200 No. bed hospital development (Source: Architectural Design Statement - TOT Architects, 2026).

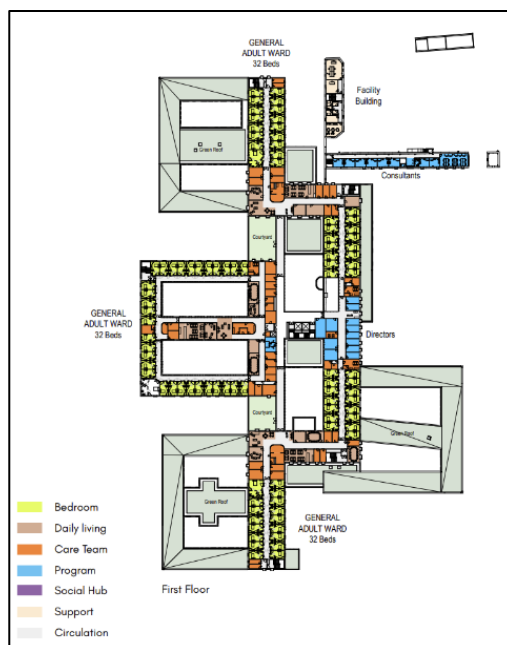


Figure 4.5: Image of the first-floor level of the proposed 200 No. bed hospital development (Source: Architectural Design Statement - TOT Architects, 2026).



Figure 4.6: Image of the courtyard of the proposed 200 No. bed hospital development (Source: Architectural Design Statement - TOT Architects, 2026).

4.5 14 No. Bed In Patient Adolescent Unit

This proposed unit will be one storey in height (the same as the unit it is replacing), and for clinical and safeguarding reasons, is entirely separate from the rest of the facility. Designed to meet the specific needs of younger service users, the unit operates independently while remaining functionally connected to the wider hospital campus. The building is arranged into two main zones: the inpatient section and the outpatient therapy area. The inpatient section follows the same layout principles as the other hospital wards, with a central courtyard surrounded by bedrooms and shared communal spaces that support both comfort and supervision. The outpatient area includes multipurpose therapy rooms that support daytime therapeutic programmes. While the two areas can function separately for privacy and clinical reasons, internal connections allow them to operate together when required.

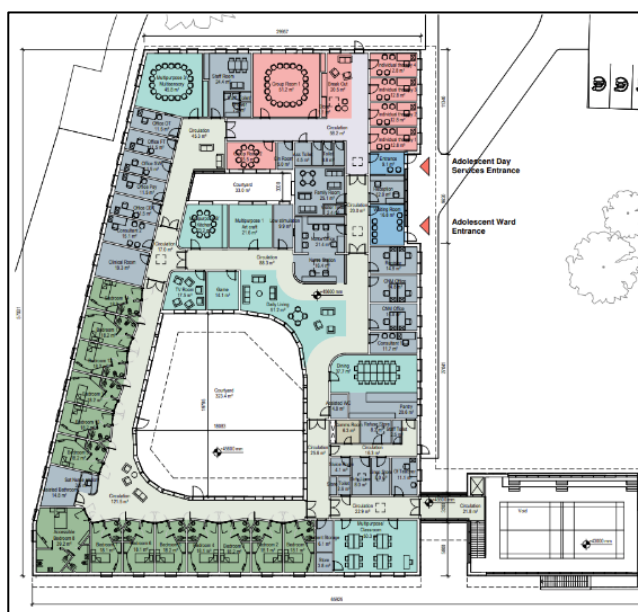


Figure 4.7: Image of the ground floor of the proposed 14 No. In Patient Adolescent Unit development (Source: Architectural Design Statement - TOT Architects, 2026).

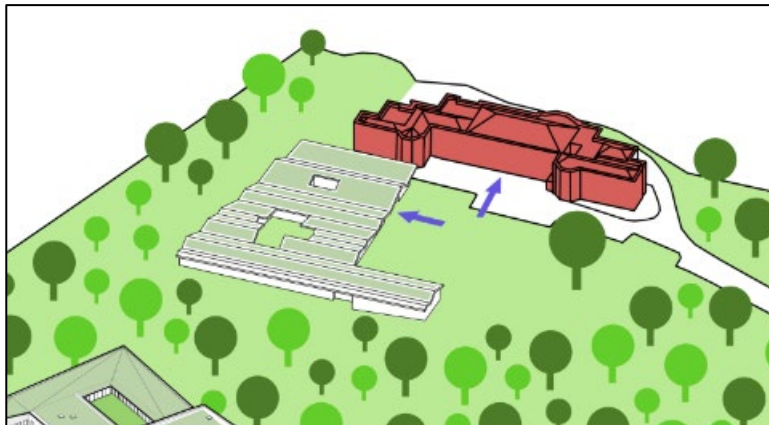


Figure 4.8: Image of the proposed 14 No. In Patient Adolescent Unit development (Source: Architectural Design Statement - TOT Architects, 2026).



Figure 4.9: Image of the ground floor of the proposed 14 No. In Patient Adolescent Unit development (Source: Architectural Design Statement - TOT Architects, 2026).

As with the main hospital, the Adolescent Unit has been designed for long-term adaptability and future re-use. The internal layout supports a range of clinical and care scenarios, with the flexibility to be reconfigured to serve as a general hospital ward or a small nursing facility, should future needs evolve.

4.6 Open Space Provision

The green areas located/proposed within this application will have an established hierarchy guaranteeing accessibility and security for both service users and the public. These will consist of:

- Public Open Space: maintaining the existing walking loop and access to the future Liffey Valley Park;

- Open garden: green lungs connecting the new hospital and the existing buildings (accessible by service users and staff only);
- Private gardens: secure garden directly accessible from the new hospital by service users and staff only, and
- Private Courtyards: secure private green spaces within the ward areas.



Figure 4.10: Illustration showing proposed development permeability (Source: Architectural Design Statement - TOT Architects, 2026).

The open spaces and courtyards within the proposed development are designed specifically with the varied requirements of the service users in mind. Within the larger external open space setting, several smaller sub-spaces will provide more intimate opportunities for contrast and variation, allowing for rest and contemplation, as well as social interaction and solitude. This is outlined further in the enclosed Architectural Design Statement, prepared by TOT Architects.

4.7 Landscaping Strategy

As detailed above and in particulars submitted with this application, the proposed development provides for significant public and private open space provision. It is submitted that this open space provision is encompassed within the landscaping strategy, which seeks:

- The retention and enhancement of the existing woodland and associated green infrastructural elements;
- To not simply apply greenery to open areas but to place the new healthcare facilities within a cohesive landscape that responds to and integrates the proposed development within the site;
- Further planting of native hedgerows and the inclusion of a pond and seasonal wetland area to contribute towards enhancing the existing biodiversity and habitat of the site;
- Ensuring the health of trees is retained within the development site, and their protection during the construction process, and
- Achieving compliance with Green Infrastructure score as designated by the *South Dublin County Development Plan (2022-2028)*.

In respect of the above, the proposed development is informed by a planting strategy, which is informed by the use and further provision of native and edible species with seasonal interest that adds identity to the landscape experience and creates meaningful connections with nature. This further planting of native hedgerows and the inclusion of a pond and seasonal wetland area also contribute towards enhancing the existing biodiversity and habitat of the site.

The landscaping strategy takes into account the locations and purposes of medical units provided and so adopts a planting strategy which ensures both privacy and sensory experience. Through this approach, spaces have been developed to allow users to take refuge in but also to look out from, so that they are able to survey the landscape and gain control over their interactions with others. Activities may vary in intensity to stimulate curiosity and foster meaningful engagement across a range of service users.

The Green Space Factor 'is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area.' (SDCC Green Space Factor Guidance Note - August 2022). The landscape proposals within the proposed development have taken this into account from the initial concept stages, with the inclusion of high value biodiversity measures incorporated into the open spaces. This includes SuDS measures, substantial areas of green roof, a biodiversity pond and wetland area, new woodland and extensive tree planting, among other measures. The minimum required GI score as designated by SDCC within the site is 0.7. The landscape proposals have achieved a score of 0.72 which passes the required score. It is noted that initial high level assessment of the existing site, based on the current ecological mapping by JBA Consultants, the site scores 0.62, which is under the minimum required score. This amounts to an approximate 14% increase from existing landscape conditions to proposed.

4.8 Conservation Strategy

General Conservation Strategy

As detailed within the previous sections of this *Report*, this proposed development site encompasses several historic elements dating back to the 19th and 18th centuries, several of which are on the official Record of Protected Structures.

In turn, conservation and retention of these elements have been a key design team consideration from the outset of this proposed development. Rather than simple retention of these elements, the proposed development seeks to enable their future use as active and meaningful components of the new campus, integrating them in ways that ensure their long-term use and visibility, and ensuring their conservation in use.

Exclusion of Certain Structures from Statutory Notices

The application site was historically associated with the wider St. Edmondsbury demesne, as it was previously known in historical records and mapping, particularly dating back to the 19th Century; however, this relationship has been substantially altered through subdivision and subsequent development, much of which took place in the mid to late 20th and early 21st centuries. As a result, the functional, visual, and spatial connections between the site and the former demesne structures have been significantly eroded and are no longer readily legible.

The site does not form part of the present-day setting of these protected structures, either in terms of designed landscape, spatial enclosure, or intervisibility. The proposed development does not give rise to any direct or indirect impacts on the character, setting, or appreciation of these structures.

A limited historic association remains with the gate lodge, RPS No. 28, which historically formed part of the entrance sequence to the demesne and is located adjacent to an established right of way. However, no works are proposed to this route or in the vicinity of the gate lodge, and the proposed development does not affect its setting, function, or character. In addition, Carrig Conservation have also assessed the link between the proposed development and RPS. 10 but again, the setting of the building and whatever relationship it may have had back to the original house or farmyard buildings appears to be largely erased. Accordingly, these structures have not been included within the statutory notices following assessment. Accordingly, no impacts arise in respect of nearby protected structures. This is outlined further in the enclosed AHIA documentation prepared by Carrig Conservation, as well as in the enclosed EIAR, prepared by JBA Consulting.

Garden Wall

Substantial lengths of the historic garden wall which surrounded the original estate are retained and incorporated into the new layout, becoming a key architectural entrance of the eastern entrance into the Hospital.



Figure 4.11: Image showing the integration of the Garden Wall into the development (Source: Architectural Design Statement - TOT Architects, 2026).

On the northern side, where the new therapy hub slightly overlaps with the historic footprint, a portion of the original wall is carefully dismantled and reconstructed as part of the new building fabric.

Further Derelict Buildings

In addition to the walled garden, the site includes two derelict or ruinous historic structures: the old coach house and the old barn. Both buildings are in a state of significant disrepair, but will be restored as functioning parts of the campus.

The old coach house will be rehabilitated and adapted to serve as the facility building, supporting operational needs of the hospital while preserving the external character and form of the original structure. The existing stone structure will be retained and carefully consolidated, preserving the character of the building while bringing it up to the required structural and safety standards.

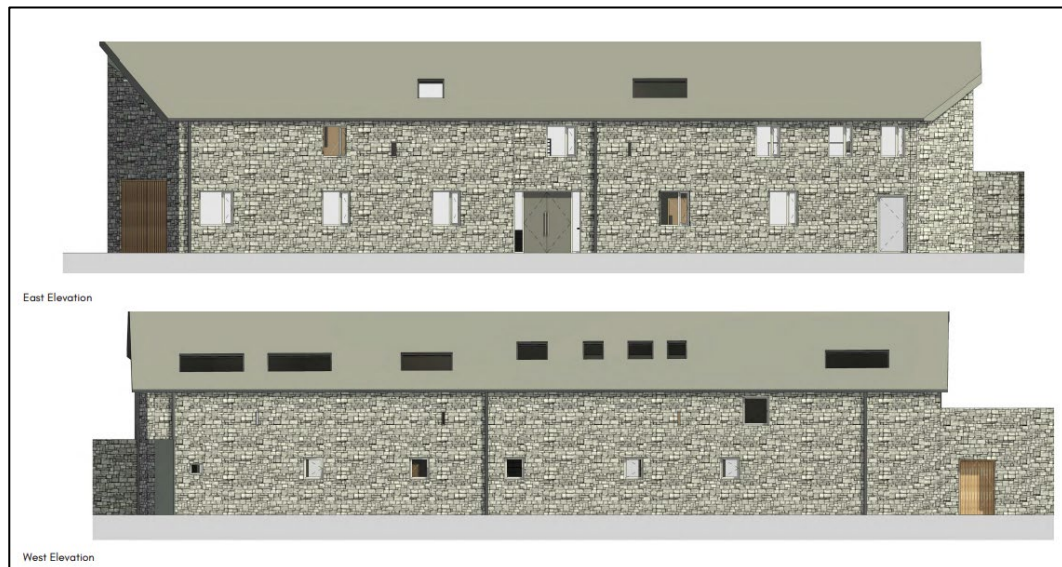


Figure 4.12: Image showing the integration of the Coach House into the development (Source: Architectural Design Statement - TOT Architects, 2026).

The old barn will be repurposed as a consultant building housing individual therapy offices, and a public café will be integrated into the eastern end of the building.

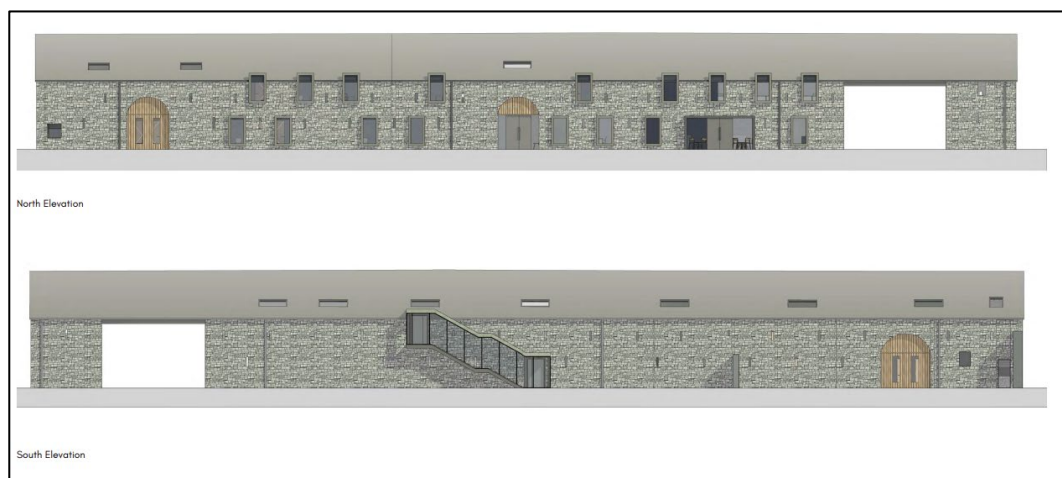


Figure 4.13: Image showing the integration of the Old Barn into the development (Source: Architectural Design Statement - TOT Architects, 2026).

5.0 PLANNING HISTORY

A detailed review of the planning history associated with the site included the undertaking of planning file searches on the South Dublin County Council online planning application portal. Planning history is reviewed in order to ascertain if previous applications on the subject site have raised any concerns either from those making submissions/observations on the applications (and appeals against decisions) or concerns raised by the planning officers considering the applications/appeals. Once such concerns have been identified, whatever proposal is in hand can be configured, insofar as is possible, to address them.

We conducted a planning history search of the site using the South Dublin County Council Planning Application Portal online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site and of similar sites in the vicinity. All planning applications are recorded in a Planning Register kept by the relevant Local Authority. Whilst every effort is made to carry out a detailed planning history search, it is important to note that our findings are only as accurate as the Planning Authority's available records.

5.1 Summary of Application Site History

The Planning History of the development was sourced by reviewing the planning files on the online portal of South Dublin County Council. The online search identified that the following planning applications were made at the subject lands during the period from 1999 to the present. The full planning application history for the site itself is summarised below.

Table 5.1 Planning History of the Subject Site. [Source: South Dublin County Council Planning Portal 2026]

Application Reg. Ref	Applicant	Development Proposal Summary	Decision
SD14A/0210	The Board of Governors	Replacement of the existing high-level water storage tank with a new water storage tank room (the property is a Protected Structure)	Grant Permission 05/01/15 subject to 3 no. planning conditions
SD11A/0056	St. Patrick's University Hospital	(1) The installation of a new passenger lift serving basement, ground and first floor levels, this includes a lift lobby extension at first floor level; (2) the subdivision of a Day Area on the southern side of the building at ground floor level; (3) the installation of a rooflight over the new Day Patient Reception Area; (4) the erection of a 2.7m high steel and timber fencing with double access gates to the east end of the three storey building; (5) the erection of a 2.7m high steel fencing with polyester coated finish to southern side of single storey (1985) 50 no. bed ward building. The proposed development consists of carrying out works to a Protected Structure	Grant Permission 07/06/11 subject to 4 no. planning conditions
S00A/0045	The Board of Governors	Replacement of the existing entrance porch and provision of a new access ramp at the entrance to the existing single storey ward building	Grant Permission on 04/05/02 subject to 2 no. planning conditions
S99A/0401	Ballymore Properties Ltd	Erect replica gates, piers and new walls on N4 Lucan Road, and provide new boundary treatments.	Refuse Permission on 13/08/99. Refusal reasons unavailable.

These applications largely relate to minor works to the existing hospital to improve the functionality of the structure over time. Consideration of design and visual amenity is noted as a common theme in the assessment of these applications by South Dublin County Council, particularly in relation to the protected structures on site.

5.2 Surrounding Development

Table 5.2 Planning History of the Subject Sites Adjoining Lands. [Source: South Dublin County Council Planning Portal 2026]

Application Reg. Ref	Applicant	Development Proposal Summary	Decision
SD25A/0147W / ACP-323595-25	Lucan District Credit Union LTD	Demolition of disused bungalow, unoccupied for c.8 years and in advanced disrepair: Replacement by the construction of a new three-storey office building and ancillaries comprising site development works, soft landscaping, cycle and car parking areas with EV charging points.	Refused Permission on appeal on 21/01/2026 on 1 no. ground (conflict with residential zoning objective).
SD25B/0120W	Deborah Kiernan and Jonathan Roach	Conversion of existing attic space comprising modification of existing roof structure, raising of existing gable c/w window, new access stairs, 2 no. roof windows to the front and a flat roof dormer to the rear.	Grant Permission on 10/06/25, subject to 3 no. conditions.
SD25A/0304W	Dr Mujeebullah Arain	The development will consist of a change of use of the existing dwelling to doctor's general practice rooms, modifications to existing elevations and plan layout, together with two storey extension to the rear comprising 2 no. 2-bed apartments. The development also includes 14 no. car parking spaces, a bicycle stand, modifications to the existing entrance, private and common amenity areas and all associated site works.	Additional Information requested 18/02/26.



SD24A/0137W	DAA PLC	The installation of an aircraft noise monitoring terminal on a standalone, tiltable mast structure (6m in height), along with associated works, including electrical connection on land within the car park.	Grant Permission on 30/08/24, subject to 7 no. conditions.
SD24A/0198	Canon Despard Centre	Permission for the removal of the existing prefabricated structure on site with replacement permanent detached two-storey/dormer structure located to the north-east of the site for mixed flexible community uses (such as childcare/creche/playschool/community uses) and all associated site works. The development is within the curtilage of a site that includes protected structure 025, James McCarten memorial slab 1807 and within a natural heritage area adjoining the Liffey valley.	Grant Permission on 10/03/25 subject to 22 no. conditions.
SD24A/0161	Canon Despard Centre	Removal of existing prefabricated structure on site with replacement of a permanent detached two-storey/dormer structure located to the south-west of the site for mixed flexible community uses (such as childcare/creche/playschool/community uses) and all associated site works. The development is within the curtilage of a site that includes a protected structure 025, James McCarten Memorial Slab 1807 and within a natural area adjoining the Liffey Valley.	Grant Permission on 10/03/25 subject to 22 no. conditions.
SD23A/0160	daa PLC	The installation of an aircraft noise monitoring terminal on a standalone, tiltable mast structure (6m in height) along with associated works, including electrical connection on land adjoining the car park within the grounds of Scoil Mhuire Girls' National School, Lucan Road, Lucan, Co. Dublin.	Permission refused on 31/10/23. Refused on 2 no. grounds (proximity to a protected structure, negative visual impact).



SD23A/0228	The Board of Governors of the King's Hospital School	Application for a 10-year permission for development within the grounds of the King's Hospital School, Old Lucan Road, Palmerstown, Dublin 20, D20 V256. The proposed development will alter a Protected Structure (RPS Ref: 066 Avondale) and is located within the curtilage of another Protected Structure (RPS Ref: 017 Brooklawn). The proposed development will also result in the removal of some protected trees and the planting of new soft landscaping (Tree Preservation Order (Quarryvale, Brooklawn) (Liffey Valley No.1) Order 1990). The development will consist of amendments to existing sports pitches to create: a) 1 no. synthetic all-weather rugby pitch (120m x 70m) with team dugouts, 1.2m high boundary fencing, and floodlighting (18 no. 1200 watt LED luminaires mounted on 6 no. 15 metre high columns); 1 no. synthetic all-weather rugby training area (70m x 38m) (Training Area 1) with floodlighting (8 no. 800 watt luminaires mounted on 4 no. 12 metre high columns); 1 no. synthetic all-weather rugby training area (60m x 20m (Training Area 2)) with floodlighting (12 no. 300 watt luminaires mounted on 6 no. 8 metre high columns); and 1 no. synthetic all-weather hockey pitch (91.5m x 55m) with fencing and ballstop netting enclosures (7.5m high), team dugouts, and floodlighting (16 no. 1200-watt luminaires mounted on 4 no. 18 metre high columns). The development will also consist of b) the construction of a new 2 storey clubhouse (1,247 sq m gross internal area) on a raised podium with changing rooms, toilets, office and plant rooms, multi-use space (gym & function area) and first floor external spectator terrace (310 sq m); c) removal of some existing protected trees and the planting of new soft landscaping; d) new one-way vehicle and cycle route with drop off areas and lighting; e) new illuminated 109 no. space car park with five no. additional bus parking spaces; f) widening of vehicular egress point on Old Lucan Road by relocating existing gate piers and part-demolition of boundary wall on Old Lucan Road to create new cycle and pedestrian path (these works would alter Protected Structure Ref: 066 Avondale); g) new one-storey ESB substation switchroom; and h) earthworks, drainage infrastructure and attenuation, hard and soft landscaping, and all other associated site development works.	Permission Refused on 09/11/23. Refused on 3 No. grounds (adverse effects on bats, Intensive floodlighting at this location would be visible from a significant distance and intrusive in the landscape and deficiency in the information provided.)
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SD23B/0292	Haroon Khan	a) Retention Permission for alterations to previously approved planning permission Ref. SD19B/0187 incorporating the following: 1. Overall 12sqm increase of ground floor single story extension with low-pitched roof to the rear of the existing house; 2. Raised ridge height of pitch roof to 8.048m above ground level on 2-story extension at rear of existing house, including removal of 2 no. chimneys; 3. Change of use of existing garage into multi-purpose room, with 19.5sqm single story extension to the rear of the existing garage and the replacement of the main garage door with an aluminium window; 4. Alterations to main entrance gates onto Lucan Road; 5. A 12.5sqm gazebo, a 14.7sqm barbeque and a 9.5sqm garden shed of, all situated in the rear garden; and, b) Planning Permission for alteration to as-built gable of pitch roof into a hipped roof fronting onto the R835 Lucan Road.	Permission Granted on 02/10/23, subject to 9 no. conditions.
SD22B/0186	Saieb & Mary Al Safi	Single-storey extension to bedroom and to bathroom at first floor/dormer level at the rear and western end of house.	Permission Granted on 10/08/22, subject to 4 no. conditions.
SD22A/0324 / ABP-314994-22	Frances Dowling	Demolition of an existing house; Ancillary outbuildings and the construction of 1no. 2-4-storey building accommodating 19no. apartments comprised of 6no. one bedroom apartments and 13no. Two-bedroom apartments; Vehicular access to the proposed development will be via Lucan Road, with traffic calming measures on Lucan Road; 11no. car parking spaces and 20no. bicycle parking spaces and ancillary services, including a detached water storage tank and bin store housing all on a site of 0.1925 Ha	Notification of Refusal of Permission on 03/10/22. Refused on 1 no. ground (proximity to junction on R835 deemed to be a traffic hazard) Appealed to ABP on 01/11/22. ACP granted permission by order dated 18/11/25, subject to 20 no. conditions.



SD22B/0136	Allison Davis and Stephen O' Shaughnessy	Pitched roof single-storey extension to the western side and rear of the property with associated site works.	Grant Permission on 05/07/26, subject to 5 no. conditions.
SD21A/0245	The Select Vestry, Leixlip Union of Parishes	Retention of 2 no. prefabs as childcare facilities within the curtilage of a Protected Structure 025 - James MacCarten slab 1807 within a National Heritage Area adjoining Liffey Valley.	Grant Permission on 09/02/22, subject to 10 no. planning conditions.
SD21A/0020	Presentation Sisters	Removal of a portion of the existing boundary wall to the front and construction of new vehicular and pedestrian entrances.	Grant Permission on 12/08/21 subject to 8 no. planning conditions.
SD20A/0333	Presentation Sisters	Subdivision of existing bedrooms and the formation of openings in partition walls to form a total of 5no. ensuite bedrooms on the ground floor level and 11no. ensuite bedrooms and one bedroom on first floor level to include associated new foul drainage and the removal of existing first floor ensuite structure to rear;; demolition of existing single storey 20th century laundry/stores extensions to side; construction of new single storey kitchen and stores; demolition of existing porch and reconstruction of new porch in kitchen yard; the removal of existing bathrooms on ground and first floor over to accommodate the installation of a lift; change of use of existing chapel for use as mission office and associated works	Grant Permission on 31/05/21 subject to 12 no. planning conditions.
SD20A/0142 ABP Ref. Reg. ABP-309525-21	Frances Dowling	Demolition of an existing house, Hillhouse, Lucan Road and ancillary outbuildings and the construction of 1no. 4-storey building accommodating 20no. apartments comprised of 5no. one bedroom apartments and 15no. two-bedroom apartments. Vehicular access to the proposed development will be via Lucan Road and Lucan Heights, with 13no. car parking spaces and 12no. bicycle parking spaces and ancillary services, including a detached water storage tank and bin store housing all on a site of 0.1925Ha	Notification of Grant of Permission on 28/01/21 3 rd Party Appeal to ABP on 24/02/21 and subsequently refused permission on 22/12/21, on 1 no. ground of refusal (traffic hazard).

SD19A/0198	Frances Dowling	Demolition of existing house and ancillary outbuildings and the construction of 1 four storey building accommodating 21 no. apartments comprised of 6 no. one bedroom apartments and 15 no. two bedroom apartments; vehicular access to the proposed development will be via Lucan Road, with 13no. car parking spaces and 12no. bicycle parking spaces and ancillary services all on a site of 0.1925 Ha	Refuse Permission, subject to 4 no. planning conditions (overbearing impact, visually obtrusive appearance, traffic hazard and lack of compliance with the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018))
SD18A/0132	The Select Vestry of Leixlip Union COI	Retention of change of use of existing single-storey national school building premises from education to childcare facilities in classrooms and to recreational facility for mixed use in general purpose hall. Retention of 2no. pre-fabs – Prefab No. 1 (southwest of site) to be retained as recreational facilities for mixed use, Prefab No. 2 (northeast of site) to be retained as childcare facility. Retention of boiler house extension. Retention of secure play area to north classrooms. Proposed signage and logo at east gable (at entrance) titled Canon Despard Centre within a curtilage that includes Protected Structure 025, James MacCarten memorial slab 1807, within a natural heritage area adjoining Liffey Valley.	Grant Permission for Retention, subject to 7 no. planning conditions
SD16A/0072/EP	Board of Management, St. Andrew's National School	(1) Demolition of existing single and two-storey post-primary school buildings (1050sq.m) to the east of the main school buildings. (2) Construction of a part two, part three storey post primary school extension (3346sq.m in total) configured as follows; (a) three storey extension (1817sq.m) north of main school building along the Lucan Road forming a new post primary school pedestrian entrance off the Lucan Road, (b) two storey extension (1340sq.m) to the east of main school buildings, (c) two storey extension (escape stairs 55sq.m) to the south of main school buildings on the west side of the two storey classroom block, (d) single storey extension (133sq.m) at first floor north of the existing PE hall. (3) Reconfiguration of the existing vehicular and pedestrian access off Lucan Heights to form the main post-primary school vehicular entrance and secondary pedestrian entrance. (4) The reconfiguration of the existing primary school pedestrian entrance in its current location off the Lucan Road and the re-designation of the	Grant Extension of Duration 26/07/21, subject to 2 no. planning conditions

		existing post-primary school vehicular entrance as the primary school vehicular entrance. (5) All associated site works.	
SD16A/0072	Board of Management, St. Andrew's National School	(1) Demolition of existing single and two-storey post-primary school buildings (1050sq.m) to the east of the main school buildings. (2) Construction of a part two, part three storey post primary school extension (3346sq.m in total) configured as follows; (a) three storey extension (1817sq.m) north of main school building along the Lucan Road forming a new post primary school pedestrian entrance off the Lucan Road, (b) two storey extension (1340sq.m) to the east of main school buildings, (c) two storey extension (escape stairs 55sq.m) to the south of main school buildings on the west side of the two storey classroom block, (d) single storey extension (133sq.m) at first floor north of the existing PE hall. (3) Reconfiguration of the existing vehicular and pedestrian access off Lucan Heights to form the main post primary school vehicular entrance and secondary pedestrian entrance. (4) The reconfiguration of the existing primary school pedestrian entrance in its current location off the Lucan Road and the re-designation of the existing post-primary school vehicular entrance as the primary school vehicular entrance. (5) All associated site works	Grant Permission on 22/10/16, subject to 16 no. planning conditions
SD12A/0115 ABP Ref. PL06S.241054	Commissioners of Public Works	Construction of a new two-storey primary school with a total internal floor area of 2632sq.m. consisting of: 16 classrooms, 1 no. special needs unit, a general-purpose room, library, support accommodation and all ancillary works. The development also includes the provision of 34 on-site car parking spaces, vehicular access roads, set down areas, pedestrian access pathways, new vehicular and pedestrian entrance and exit gates, works to Lucan Road, ball courts, play areas, bin store, bicycle shelters, connection to foul drainage system, surface water attenuation, signage and landscaping.	Notification of Grant of Permission on 10/8/2012, subject to 14 no. conditions. 3 rd Party Appeal to ABP. Granted by ABP subject to 16 no. conditions.
SD10A/0295 ABP Ref. PL 06S.238190	Minister for Education and Skills	Outline permission for a Primary School (16 to 18 no. Classrooms) of approximately 2400 square metres, ranging in height from one to two storey principally and part three to four storey, with associated ball courts, play areas, car parking, new vehicular and pedestrian access points from the Lucan Road, and ancillary works	Notification of Grant of Permission on 24 th November 2010, subject to 7 no. conditions. 3 rd Party Appeal to ABP (by An Taisce). Granted Permission by ABP subject to 5 no. conditions on 7/4/2011

SD06A/0545	Board of Management, St. Andrew's National School	2 no. prefabricated classrooms and toilets, alterations for existing classrooms and associated site works, including raising of boundary fence	Grant Permission on 5/2/2007, subject to 5 no. conditions
SD03A/0391	Board of Management, St. Andrew's National School	Development of a pre-fabricated classroom, inclusive of porch and toilets, and associated site works.	Grant Permission on 5 th September 2003, subject to 6 no. conditions
S00A/0524	Board of Management, St. Andrew's National School	Temporary prefab classroom.	Grant permission on 13 th October 2000, subject to 4 no. conditions.
S99A/0656	Lucan Educate Together	Retention of Emergency Temporary School Accommodation.	Granted Planning Permission on 31 st January 2000, subject to 2 no. conditions.

In turn, upon reflection on this relevant planning history, it is submitted upon review of the planning history surrounding the subject site that there is no development nor precedent that would negatively impact the suitability of the proposed development, which is the subject of this application.

5.3 Mental Health Infrastructure Development Within the GDA Region

The following section details planning history concerning the development of mental healthcare facilities within the Greater Dublin Region.

Table 5.3 Planning History of the Subject Site. [Source: South Dublin County Council Planning Portal 2026]

Application Reg. Ref	Applicant	Development Proposal Summary	Decision
South Dublin County Council			
SD24A/0187W / ABP-321950-25	MLPCC Development Company Limited	The construction of a 4-storey Primary Care Centre building, which will provide HSE Services such as general primary care, mental health, disability and older person services.	Permission granted on 18 th Jul 2025
Fingal County Council			
DAC/123/17/Rev	Balbriggan Primary Healthcare Ltd	The General Medical Clinic on the third floor has been replaced with the Child and Adolescent Mental Health Services clinic, with associated changes to the internal layout. Location: Balbriggan Primary Healthcare Ltd., Dublin Street, Balbriggan, Co. Dublin.	Permission granted on 31 st Aug 2017



Dublin City Council			
WEB2816/25	The Health Service Executive	The Health Service Executive (HSE) intend to apply for planning permission for development at a site of c. 0.3 ha on lands at the Rathmines Waste Management Bring Centre, Gulistan Terrace, Rathmines, Dublin 6, D06 KD28. The proposed development consists of the demolition of 4 no. existing structures on site (c. 440sqm, 106sqm, 228 sqm and 198 sqm) located at the centre, northern and eastern boundary of the site and the removal of the boundary wall on the western element of the site (c. 19 m in length); and the construction of a part-1 to part-5 no. storey primary health care facility (total gross floor area c. 5,495 sqm), with associated lift risers at sixth floor parapet level. The facility is to be over a 1 no. storey basement carpark (c. 1,825 sqm) with natural ventilation grills around building perimeter. The facility is to be comprised of GP consulting rooms; community mental health facilities; physiotherapy and paediatric gyms; therapy and activity rooms; dining room; ancillary reception, office, staff and patient facilities; and an older person's day care centre at ground floor level and an internal therapeutic garden courtyard (c. 195sqm). The development will also provide for PVs at fifth floor roof level; external plant (c. 104 sqm) at fourth floor roof level; a first floor roof terrace on the southern element of the site (c. 265sqm); a second floor roof terrace on the eastern element of the site (c. 237 sqm); public vehicular access road from Gulistan Terrace with turning hammerhead including pedestrian footpaths and associated set down area and accessible parking; staff car parking spaces at basement level accessed via a controlled access road and ramp; EV parking facilities; SUDs including intensive green roof provision; tanks and associated water hydrants; plant rooms; site lighting; 1 no. substation; bin storage including clinical waste storage; signage and wayfinding installations; services provision; deliveries and marshalling yards; removable bollards; boundary treatments; hard and soft landscaping; changes in level; secure cycle parking facilities; ducting and piping; lighting; and all ancillary site development and excavation works above and below ground.	At the FI stage
3832/24	Health Service Executive Capital & Estates	PROTECTED STRUCTURE: the development will consist of the demolition of 3 no. existing dwellings on site, the construction of a new two-storey 10-bed mental health unit with ancillary accommodation, new vehicular and	Granted permission on 31 st Jan 2025



		pedestrian site access, 2 no. car parking spaces, provision of cycle parking, photovoltaics on the roof and ancillary development. The development will also comprise reparation works to the adjoining shared boundary wall of the protected structure of Saint Canice's Church (Record of protected structures Ref. 1554), Church of Ireland.	
GSDZ4149/23	Grangegorman Development Agency	PROTECTED STRUCTURE: Permission for development at St. Elizabeth's Court, North Circular Road and lands to the south accessed via Grangegorman Upper and Ivy Avenue at Grangegorman, Dublin 7, all located within the Grangegorman Strategic Development Zone (SDZ). The development will consist of the demolition of a c. 1,000sqm, 1-2 storey 17-bed residential mental health facility (St. Elizabeth's Court) and the construction of a c. 12,093sqm, 1-4 storey over basement Residential Care Neighbourhood comprising: 3 no. 25-bed residential care households, 2 no. 10-bed dementia households, 1 no. 10-bed mental health residency including communal living, dining and meeting rooms, catering kitchen, laundry, day care facility, physiotherapy gym, changing rooms, stores, service and plant areas, and associated administration offices; 1 no. pharmaceutical retail outlet (c. 213sqm); Private communal gardens and terraces, public realm areas, landscaping and boundary treatments; Access via North Circular Road and Grangegorman Upper; Basement car parking with ramped access via North Circular Road; Replacement of boundary wall and reinstatement of rear gardens to nos. 226, 228 and 230 North Circular Road; and all associated site development works. The application site includes a protected structure (RPS ref. 3281) consisting of a boundary wall along a portion of the eastern boundary. No works are proposed for this protected structure. Location: St Elizabeth's Court, North Circular Road, and lands to the south accessed via Grangegorman Upper & Ivy Avenue at Grangegorman, Dublin 7.	Granted permission on 24 th Jan 2024
LRD6009/23-S3 / ABP-317438-23	St. Vincent's Hospital Fairview	PROTECTED STRUCTURE: Application for a ten-year planning permission for a Large-scale Residential Development (LRD) at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The site contains protected structures under RPS Ref.: 2032 (St. Vincent's Hospital, old house/convent, including plastered extension to the west, including entrance porch to the convent. Two-storey over garden level brick building (with granite steps and entrance door surround) on the south front. Four-storey pedimented brick pavilion, with stone	Granted permission on 11 th Oct 2023



		trimmings, to the west (including granite balustrading at parapet level). Railings in front of the convent building on the north side), RPS Ref.: 8788 (Richmond House, including former chapel and courtyard with outbuildings) and RPS Ref.: 8789 (Brooklawn, a House, including red brick wall and two gate piers). The application site includes an area of the public road/footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburgh Avenue and Griffith Avenue, part of the open space within Grace Park Wood to facilitate a pedestrian/cycle connection, and part of Richmond Road to facilitate service connections and associated upgrades. The site is bound by the Grace Park Wood residential development to the north-west; Griffith Court, the Fairview Community Unit' nursing home, Fairview Day Centre, Gheel Autism Services and a graveyard to the north; the An Post Fairview Delivery Service Unit on Lomond Avenue and properties on Inverness Road, Foyle Road and Richmond Avenue to the east; existing residential and commercial properties on Richmond Road and Convent Avenue to the south and Charthouse Business Centre, Dublin Port Stadium / Stella Maris FC, and Ierne Sports and Social Club to the west of the site.	
2328/20	Health Service Executive	The development will consist of change of use from office (former credit union - class 3 use) to a day centre, for Child and Adolescent Mental Health Services (CAMHS) use at ground level and healthcare use at first and second floor levels (all class 8 use), together with alterations to internal layouts and external elevations, signage and associated site works.	Granted permission on 28th July 2020
Dún Laoghaire–Rathdown			
DZ25A/0543/WEB	DLR Properties Ltd	The development will consist of the change of use of the existing 3 storey building (c. 5,763 sqm) from office to medical use (with pharmacy at ground floor), comprising consultation, surgery, treatment rooms (to accommodate primary care teams, general practitioners, dentists and orthodontists, mental health service providers and related medical services) and ancillary medical accommodation and uses. The application relates to development within the Cherrywood Strategic Development Zone (SDZ) and is subject to the Cherrywood Planning Scheme 2014 (as amended).	Permission granted on 8th July 2025

D20A/0324	Coltard Limited	Permission for development. The proposed development comprises the change of use of Level 3 of Dún Laoghaire Shopping Centre from 'Vacant Former Retail' use to 'Primary Care Centre' use. This involves the reconfiguration of internal layouts of Level 3 of the Dún Laoghaire Shopping Centre, encompassing a total floor area of c. 4,068 sq m. The internal modifications will allow for the provision of a Primary Care Centre comprising, inter alia 1,820 sq m of HSE medical consulting and treatment rooms (including dental, physiotherapy, mental health, speech and language therapy consulting rooms); 1,433 sq m of ancillary office space; an 815 sq m General Practitioner Surgery facility including medical consulting and treatments rooms and associated ancillary floor space. The development will also consist of amendments to the existing facades of the Shopping Centre at third floor level including the provision of new fenestration on the north-eastern facade, Marine Road and Georges Street Upper facades; the provision of Internal Circulation Areas and all ancillary Staff Facilities and Staff Offices; Plant; minor amendments to the layout of the existing basement level car-park to provide 52 no. new cycle parking spaces and the reallocation of 70 no. existing car park spaces for the use of the proposed development. All works are proposed substantially within the footprint and envelope of the existing shopping centre. No changes are proposed to the existing vehicular and pedestrian access via Marine Road and George's Street Upper.	Permission granted on 19 th November 2020
Kildare County Council			
2461373	Health Service Executive	Demolition of the existing single-storey Hazel Cottage Mental Health Community Residence, & the former GP/Dispensary building, with the proposed construction of a new two-storey HSE Mental Health Community Rehabilitation Residence containing 8 bedrooms & other ancillary accommodation, 6 no. single storey Transitional Units and a Bin Store with associated site works to including landscaping, parking, new boundary walls and drainage.	Permission granted on 12 th September 2025
211286	Kyrie Therapeutic Farm CLG	Permission for change of use of the site as a therapeutic farm for the provision of a healthcare facility for up to 40 guests to operate as a step-down mental health facility. The therapeutic farm will provide therapeutic services with the farm as an	Permission granted on 21 st January 2024

		essential element of the overall programme of healing and recovery. The application proposes the demolition of an existing farm building on the site and other structures. The new build elements will comprise: A new two-storey communal building (c. 1,564 m²) centrally within the farm, comprising of kitchen/dining, office, therapy, meeting, yoga and meditation and various other rooms. Erection of eight single storey residential buildings to the west of the communal building to provide accommodation for up to 40 guests. These will comprise 4 x 4-bedroom buildings and 4 x 6-bedroom buildings. Erection of a single storey reception building (c. 318 m²) to the west of the site, adjacent to the existing farm buildings, to provide reception and ancillary facilities associated with the proposed use. Erection of a single storey shop/café building (c. 327 m²) to provide a small-scale shop and café which will be linked to the overall use of the site. The proposed buildings will be clad in vertical timber cladding at regular spacing; the roofs will be vertical timber cladding at regular spacing or dark grey/black zinc roofs. 41 car parking spaces are proposed for the therapeutic farm use and 20 car parking spaces are proposed for the shop/café. The remainder of the site will be used as agriculture, with which the therapeutic use will be intrinsically linked. This will include general planting and laying out of the farm and informal landscaping, including the provision of a lake for irrigation and ecology, internal farm tracks and roads, fencing and planting. On site wastewater treatment is proposed.	
Meath County Council			
2460475	Foxtrot Investment 2011 Limited	The development will consist of the construction of a Primary Care Centre and associated development (7-storeys) with a total gross floor area of c.7,215 sq.m as follows: I. 1 no. General Practitioner practice unit (239 sq.m) and 1 no. retail pharmacy unit (111 sq.m) located at ground floor level, with a Primary Care Centre (accessed from ground floor level) consisting of 1,477sq.m of treatment/office/support space across ground, first, second and third floor levels, an Enhanced Community Care Hub at third and fourth floor levels (1,182 sq.m), Community Mental Health Team unit at fifth floor level (950 sq.m), Mental Health Service unit at third and sixth floor levels (761 sq.m), Social Care Service unit at ground and third floor levels (587sq.m), Primary Care Centre Dental Practice at first floor level (434 sq.m), Ophthalmology facility at first and second	Permission granted on 6th March 2025

		floor levels (158 sq.m), Orthodontics unit at first floor level (154sq.m), Audiology department at first floor level (85 sq.m) and a 239 sq.m HSE / Primary Care Team shared service area at ground floor level including clinic rooms and waiting area; ii. Ancillary facilities including entrance/reception areas, canteen, WC, staff changing facilities and external amenity space at sixth floor level; iii. 200 no. car parking spaces at ground floor and podium level (including 20 no. EV charging spaces and 10 no. accessible spaces) and 30 no. bicycle parking spaces accessed from the internal estate road branching north from the N51 Kells Road; iv. 4 no. signage zones (total 33.5 sq.m) to facilitate illuminated / backlit signage at eastern elevation; v. Provision of pedestrian and bicycle lane upgrades along the Inner-Relief Road (N51) and entrance to subject site; vi. All boundary treatments, vehicular and pedestrian accesses, landscaping, green roofs, waste-storage facilities, enclosed plant area at roof level, ESB substation, water and drainage infrastructure and all associated site development works.	
Wicklow County Council			
191017	JEN Properties.	3 storey building as Phase 2 of the Wicklow Primary Healthcare Centre. The building will accommodate Tusla services, HSE mental health and social care services, primary care administrative offices, as well as ancillary accommodation including staff facilities, offices, meeting rooms, reception/waiting areas and plant rooms. Phase 2 will be accessed via the existing Phase 1 entrance and access road. The proposal will remove 83 no existing car parking spaces and provide 211 no new car parking spaces. The application also provides for service compound, bicycle parking, landscaping and boundary treatments and all ancillary site works and services.	Permission granted on 6th November 2020

It is submitted that the table above clearly illustrates that, while within the last ten years, there has been a somewhat consistent trend of permission being granted for mental healthcare infrastructure, there has been no permitting of infrastructure of scale near that which the subject development proposes.

In turn, in consideration of both the relevant planning history and the clearly established need for the development of mental healthcare infrastructure, it is submitted that the proposed development is of national imperative and importance.

6.0 PLANNING POLICY CONTEXT

6.1 National Planning Policy

The following section will detail the relevant national planning policy guidance documents applicable to the assessment of the subject application, as follows:

- National Planning Framework – First Revision (2025);
- Programme for Government (2025);
- Sharing the Vision - Implementation Plan 2025 – 2027 (2025);
- Securing Ireland’s Future Sectoral Investment Plan: Department of Health (2025);
- Sláintecare 2025+ (2025)
- The Urban Design Manual: A Best Practice Guide (2009);
- The Design Manual for Urban Roads and Streets (DMURS) (2019);
- Planning System and Flood Risk Management (2009), and
- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009);
- EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022).

6.1.1 National Planning Framework – First Revision (2025)

The First Revision of the *National Planning Framework* (NPF), published in April 2025, sets out the updated strategic spatial development policy for Ireland to 2040. The revised NPF builds on the original 2018 framework and incorporates key changes in Government policy, reflecting updated priorities in relation to climate action, regional development, demographic change, digital transformation, infrastructure investment, and spatial resilience.

The *National Planning Framework – First Revision (2025)* continues to guide national planning and investment to accommodate projected growth, including the anticipated increase of over one million people living in Ireland, over 660,000 additional jobs, and the requirement for more than 500,000 new homes by 2040. In tandem with this, there is a clear established need for an increased provision of healthcare infrastructure to align with this increasing population.

The Framework retains a strong emphasis on:

- Compact and sustainable growth in cities, towns and rural communities;
- Delivering climate-responsive and accessible urban centres of scale;

Dublin continues to be recognised as an international city of scale and is considered central to national economic competitiveness and innovation. The *National Planning Framework – First Revision (2025)* places increased emphasis on the delivery of compact, low-carbon, place-based development within the existing urban footprint, supported by investment in public services and infrastructure.

A core strategic outcome remains universal access to quality health services, framed in the context of regional equity, social inclusion and the 15-minute neighbourhood model. The *National Planning Framework – First Revision (2025)* sets out that:

“Equitable access to quality healthcare and social services is central to sustainable communities. Urban consolidation and rural renewal will enable the delivery of modern, accessible health infrastructure embedded within the fabric of daily life.” [Our Emphasis].

Within *National Strategic Outcome 10 – Access to Quality Public Services*, the *National Planning Framework – First Revision (2025)* explicitly supports the continued development of primary care centres nationally, in response to population growth and evolving models of healthcare delivery. This includes new-build projects as well as the refurbishment or adaptation of existing facilities.

Health is indeed identified as one of the main contributors to quality of life within the *National Planning Framework – First Revision (2025)*, and as such, the provision of health services on the proposed site should be welcomed as a development that aims to meet goals laid out within this national policy document. Acute hospital services are also identified to be at the top of the hierarchy structure for health infrastructure within the NPF Revision.

National Policy Objective 26 states:

“Support the objectives of public health policy, including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policy”.

Such a development also holds the potential for significant job creation in the Dublin Metropolitan Area. Employment growth is identified as a key enabler for making stronger urban places. National Policy Objective 3 for the Eastern and Midland Region aim to have “470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040), i.e. a population of almost 3 million”. Such a development holds the potential for significant job creation, both during the construction phase and during the long-term operational phase. In keeping with this core element of stronger urban places, National Policy Objective 4 outlines:

“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs”.

The objectives of employment growth and population growth are interlinked within the *National Planning Framework – First Revision (2025)*. There is recognition that these two elements share a symbiotic relationship, and it is recognised that employment growth can support the significant population growth targets set out by the subject policy document.

*“As part of the National Planning Framework strategy to accelerate the development of and strengthen these Cities, **all three should also plan to grow by at least half, i.e., by 50% to 60%, to 2040**”.* [Our Emphasis].

The NPF Revision notes the necessity of prioritising developments within built-up areas in order to make adequate use of existing land and connectivity:

NPO 11:

“Prioritise development within existing settlements that support employment, housing and services, while making efficient use of land and infrastructure”.

The updated NPF Revision also introduces further guidance regarding development proposals within urban contexts as follows:

NPO 13:

*“In urban areas, apply planning standards based on design performance and sustainability criteria, **particularly in relation to building height, public transport accessibility and carbon impact**”.* [Our Emphasis].

The proposed development directly aligns with the overarching principles and objectives of the NPF Revision. It represents a compact, community-focused and climate-conscious healthcare development on a well-located urban site and in immediate proximity to population centres. Situated close to public transport and integrated within a well-established urban neighbourhood, the development contributes meaningfully to the sustainable consolidation of Dublin.

In addition to enhancing access to mental health services, the development will help revitalise an underutilised site, delivering social value and employment opportunities. The proposal is therefore fully consistent with the document’s emphasis on integrated service delivery, compact urban regeneration and inclusive placemaking.

NPO 20:

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth”.

The proposed development aligns with this goal, particularly with generating employment within existing cities and their suburbs, and the *National Planning Framework – First Revision (2025)* outlines that there will be a presumption in favour of developments of this nature.



It is submitted that the proposed development accords with the *National Planning Framework – First Revision (2025)*, in providing much-needed mental healthcare infrastructure development through the development of a currently underutilised site, being located in immediate proximity to public transport services, of appropriate scale, height and massing.

6.1.2 Programme for Government (2025)

Published in January 2025, the *Programme for Government* is a document which details the current coalition's aims for every department and policy area until 2030. The following objectives are of particular relevance:

“Enhance youth mental health services for those up to age 25, focusing on smoother transitions from CAMHS to adult mental health services”

“Increase capacity by between 4,000 and 4,500 new and refurbished inpatient hospital beds across the country.”

The proposed development aligns with the *Programme for Government* aims of increasing mental health care services and hospital beds through the provision of an enhanced mental health care facility offering first-class and innovative mental health care and including 214 No. beds.

It is submitted that the proposed development accords with the *Programme for Government (2025)*, aligning with the Government's aim of increasing mental health services nationally.

6.1.3 Sharing the Vision - Implementation Plan 2025 – 2027 (2025)

Published in April 2025, *Sharing the Vision – Implementation Plan 2025-2027* is Ireland's ambitious, national mental health policy to enhance the provision of mental health services and supports from mental health promotion, prevention, early intervention and specialist mental health service delivery during the period 2025 - 2027.

Section 3.1 notes the need for greater healthcare infrastructure:

“Mental health services provided in the community, including community mental health teams, day hospitals and crisis resolution services.”

The Plan is underpinned by four domains; these are listed as follows:

“i) Promotion, Prevention and Early Intervention; ii) Service Access, Coordination and Continuity of Care; iii) Social Inclusion and vi) Accountability and Continuous Improvement.”

The proposed development is in line with the *Plan's* underpinning objectives, and the provision of mental health services often includes ensuring there is the availability for continuation of care over prolonged periods of time. The redevelopment of St.

Edmundsbury includes a range of services that provide a multitude of levels of care, ensuring the patient's well-being throughout their journey of care.

The *Plan* focuses on the promotion of positive mental health by improving access to mental health services, including for children and younger people. The proposed development is in line with the *Plan*'s priorities as there are to be services provided for adolescent patients. The core values of the *Plan* include the following:

- *“Domain 1- Promotion, Prevention and Early Intervention;*
- *Domain 2 - Service Access, Co-ordination and Continuity of Care;*
- *Domain 3 - Social Inclusion;*
- *Domain 4 - Accountability and Continuous Improvement”.*

The proposed development will aid in achieving the *Plan*'s four main domains for improving mental health facilities within Ireland. The redevelopment of St. Edmundsbury will provide increased availability of mental health services to adolescents and adults.

In summary, the proposed development will help achieve the objectives and aspirations to create a healthier Ireland as outlined in the *Sharing the Vision – Implementation Plan 2025-2027*.

6.1.4 Securing Ireland's Future Sectoral Investment Plan: Department of Health (2025)

Published in November 2025, this Sectoral Investment Plan sets out infrastructure investment priorities for the next five years, building on a strong track record of delivery to support the provision of equitable, accessible and high-quality healthcare across Ireland.

The *Plan*'s provision for the health sector for 2026-2030 is €9.25 billion. This represents the largest ever investment in public health infrastructure in the State and will help to deliver a stronger, more modern and digitised healthcare service, providing better and faster care for patients, improved services for families, and a safer, more supportive environment for healthcare workers.

This policy document commits to promoting positive mental health and mental well-being across the population and throughout the lifespan of need. In turn, one of the noted 'Key Investment Priorities' addresses mental healthcare provision, noting:

“Progress the programme of multi-annual mental health services capital investments, including the key priority mental health sites, perinatal care and other community-based infrastructure.”

The proposed development is submitted to accord with '*Securing Ireland's Future Sectoral Investment Plan*', with the proposed development representing a significant and much-

needed investment in mental healthcare infrastructure, which will aid in addressing the under-provision of such services identified.

6.1.5 Sláintecare 2025+ (2025)

Sláintecare 2025+ (2025) sets out a coordinated programme of reform over the period 2025 to 2027, with the objective of advancing a more integrated and universally accessible health service. Building on earlier phases of implementation, the approach reflects a clear policy direction towards the delivery of care at community level, reducing reliance on acute hospital settings and improving overall service accessibility. Key measures include the continued rollout of primary care centres, expansion of community healthcare networks, and investment in enabling infrastructure such as digital health systems and regional service structures. In planning terms, this represents a shift towards a more distributed model of service provision, aligned with population need and supported by enhanced workforce capacity and organisational reform.

The implementation of Sharing the Vision, together with the National Mental Health Promotion Plan and a successor to the existing suicide reduction strategy, indicates a whole system approach encompassing prevention, early intervention and specialist care. From a spatial planning perspective, there is a clear emphasis on embedding mental health services within community settings and existing healthcare infrastructure. This supports the broader objective of accessible, locally delivered care, though it suggests that future requirements for dedicated mental health facilities may arise incrementally as part of integrated service expansion. In this regard we note that the plan states;

“Mental Health Promotion: A new National Mental Health Promotion Plan was launched in December 2024. Pathways to Wellbeing, our National Mental Health Promotion Plan, is Ireland’s first National Mental Health Promotion Plan, fulfilling a policy commitment set out in both Sharing the Vision: A Mental Health Policy for Everyone and in the Healthy Ireland Strategic Action Plan. The Plan shifts our focus beyond individually oriented clinical services to stronger protective factors and enhanced supports for good mental health.”

The proposed development is in line with Sláintecare as it aims to provide timely access to essential medical care and increase capacity in mental health services in Ireland. The facility aims to focus on ensuring patient wellbeing by providing different levels of care across out-patients and in-patients.

6.1.6 The Urban Design Manual: A Best Practice Guide (2009)

The *Urban Design Manual* presents 12 No. criteria that should be used to facilitate assessment of planning applications and should therefore be used as a guide to steer best design practice for residential proposals.

The figure overleaf illustrates the 12 No. criteria in question.



Figure 6.1: 12 No. criteria for development [Source: Department of Housing, Local Government and Heritage, 2009]

In short, the proposal's response to the various criteria set out by the Guidelines is summarised as follows. Please refer to the enclosed *Architectural Design Report* prepared by TOT Architects for further details.

Context

The proposed development has been designed to positively respond to the neighbouring properties of the site, the natural topography and the provisions of the *South Dublin County Development Plan (2022-2028)*. Please refer to the enclosed *Architectural Pack* prepared by TOT Architects, respectively, and submitted with this application. Both of these Reports outline in great detail how the surrounding, existing context was considered during the iterative design approach to the proposed scheme.

Connections

The proposed development sees the provision of a revised and improved entrance arrangement, which, through a widened entrance, allows ease of access to the hospital and ensures that the proposal will not lead to undue traffic impacts upon the local traffic network. For more information, please see the *Traffic and Transport Assessment* submitted by Egis Engineering Ireland and submitted with this application.

Inclusivity

The design of the scheme ensures that the care units are fully accessible for people with disabilities. It is submitted that all elements of the scheme are compliant with Part M of the Building Regulations.

Variety

As outlined within particulars submitted with this application, the proposed development sees a mix of facilities provided to cater for the needs of patients.

Efficiency

The proposed development has ensured to utilise the land available as efficiently as possible. This proposal seeks to take the existing healthcare facility on site and develop it to its full extent to make up for the shortfall in the provision of such infrastructure.

Distinctiveness

The proposed development fits within the existing built environment, being aware of its setting and constraints in order to provide a sustainably scaled development, while also utilising heritage elements of value present on the site within the proposed development.

Layout

The scheme layout will facilitate viewpoints, pedestrian desire lines, and encourage pedestrian movements. The layout also provides for a new landscaped public open space at accessible locations. Traffic speeds are controlled by design and layout, and the scheme is fully DMURS compliant. For further information, please see the *Architectural Design Statement* prepared by TOT Architects.

Public Realm

High-quality public realm design and public open space have been appropriately located in the scheme. All open space areas are overlooked to provide natural surveillance.

Adaptability

The proposed development has been specifically designed to function as a 214 No. bed mental health facility, with all associated therapeutic, administrative, and support spaces fully integrated into a coherent layout. However, the spatial organisation and infrastructure allow for future adaptability to alternative healthcare uses, such as a general hospital or a nursing home.

Privacy and Amenity

All elements of the proposal have been designed in accordance with best practise design to ensure privacy for patients. While there will be extensive public open space and an open garden, the proposed development will also see private gardens and courtyards provided.

Private gardens are provided in the form of secure gardens directly accessible from the new hospital by service users and staff only. Private courtyards are also provided in the form of secure private green spaces within the ward areas.

Parking

It is proposed to provide 214 No. car parking spaces and an additional 160 No. bike parking spaces (104 No. long stay and 56 No. short stay) as part of this development to ensure an adequate provision of parking facilities.

Detailed Design

The design of the proposal has been informed by input from each of the consultants involved within the design team (incorporating architectural, landscaping, engineering, environmental, conservation, heritage and planning expertise) to strike appropriate balances between elements such as maximising residential amenity of future occupants whilst also protecting the amenity of the surrounding existing dwellings, provision of open space, enabling permeability and ease of access and maximising the retention of heritage based elements on site in so having regard for the architectural conservation area setting of the proposed development.

Universal Design

In addition, it should be noted that the proposed development has been designed with the Seven Principles of Universal Design firmly in mind, to encourage access and use of the development regardless of age, size, ability or disability, as outlined in the National Disability Authority's *"Building for Everyone: A Universal Design Approach"* and *"Universal Design Guidelines for Homes in Ireland."* These principles are as follows:

- Principle 1: Equitable Use;
- Principle 2: Flexibility in Use;
- Principle 3: Simple and Intuitive Use;
- Principle 4: Perceptible Information;
- Principle 5: Tolerance for Error;
- Principle 6: Low Physical Effort, and
- Principle 7: Size and Space for Approach and Use.

The proposed development, it is submitted, accords with each of these principles.

This Manual, along with the Development Plan standards for housing have informed the design of this scheme.

TOT Architects has enclosed an architectural drawing pack in relation to the proposed development, setting out key statistics including public and private open space provision for each residential unit type, unit sizes, heights, etc. This confirms that the proposals are compliant with the above Manual and Development Plan standards, as relevant.

6.1.7 The Design Manual for Urban Roads and Streets (DMURS) (2019)

A key objective of DMURS is to place well-designed, sustainable, and safe streets at the heart of urban communities by prioritising walking, cycling, and public transport over vehicle speed. Key objectives include improving connectivity, reducing traffic speeds

through self-regulating designs, enhancing quality of life, and supporting environmental and planning policies.

The Manual advocates a design-led approach, seeking to develop street networks that allow for direct navigation to key destinations, the aesthetic and social quality of urban areas, contributing to healthier and more active lifestyles and stronger communities, and so in turn, an approach taking into account both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

The proposed development is consistent with the principles and guidance of DMURS, adhering to all guidance and best practise on design relating to access to and from the subject site entry points and encouraging the modal shift.

6.1.8 The Planning System and Flood Risk Management (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published the *Planning System and Flood Risk Management: Guidelines for Planning Authorities* in 2009. These Guidelines introduce the principle of a risk-based sequential approach to managing flood risk.

Egis Engineering Ireland has prepared a *Flood Risk Assessment* and submitted this with the application, which assesses flood risk issues in sufficient detail and provides a quantitative appraisal of potential flood risk to the site.

Drawing upon the conclusions of all relevant assessments submitted with the application, it's clear that the proposed development passes the justification test and will not lead to any unacceptable negative environmental effects either by itself or in combination with other developments. **In addition, it is to be noted that the applicant has obtained confirmation from Uisce Éireann that supportive water and wastewater services capacity is available in the area. Please refer to the enclosed JBA Consulting Ireland and Egis Engineering Ireland documentation for further information in this regard.**

6.1.9 Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)

The *Appropriate Assessment Guidance* was published to guide compliance with the *Birds Directive (1979)* and the *Habitats Directive (1992)* as implemented in Irish law by Part XAB of the *Planning and Development Act 2000 (as amended)*.

JBA Consulting Ireland has undertaken an Appropriate Assessment Screening, for the proposed development. In turn, the Design Team has ensured that a sufficient assessment has been submitted with the proposed development in order to identify, describe, and assess the likely significant direct and indirect environmental effects of a proposed project on factors like population, biodiversity, air, water, and landscape.

Drawing upon the conclusions of all relevant assessments submitted with the application its clear that the proposed development passes the justification test and will not lead to any unacceptable negative environmental effects either by itself or in combination with other developments. Please refer to the enclosed JBA Consulting Ireland and Egis Engineering Ireland documentation for further information in this regard.

6.2 EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022)

The Planning and Development Act 2000, as amended, Section 37E(1) states that;

"an application for permission for development in respect of which a notice has been served under Section 37B(4)(a) shall be made to the Coimisiún and shall be accompanied by an environmental impact assessment report".

An environmental impact assessment is therefore required to be prepared and submitted to support the planning application. Accordingly, a robust and detailed EIAR Report has been prepared by JBA Consulting and is enclosed with the application, in accordance with the EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022). The EIAR comprises 3 volumes as follows:

- Volume 1, Non-Technical Summary;
- Volume 2, Environmental Impact Assessment Report; and
- Volume 3, Environmental Impact Assessment Report Appendices.

These have been developed by JBA Consulting and the design team in a holistic manner. Please refer to the enclosed EIAR for further information in this regard.

6.3 Regional Planning Policy

The following section will detail any regional planning policy guidance documents applicable to the assessment of the subject application.

6.3.1 Regional Spatial and Economic Strategy – Strategic Issues Paper 2026

In this regard, it is noted that the Eastern and Midland Regional Assembly has commenced a review of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. As part of the pre-draft public consultation stage, the Assembly has published a Strategic Issues Paper (EMRA RSES – Strategic Issues Paper v1.14), inviting submissions from individuals, communities, local authorities, State agencies and Government departments to inform the preparation of a renewed strategic vision and framework for coordinated spatial planning and economic development across the Region. The period for submissions and observations closed on 22 May 2026.



It is of particular relevance that the Strategic Issues Paper identifies, at the outset, the need to strengthen and enhance the provision of regional-scale social infrastructure, including healthcare facilities. This emphasis is expected to be carried through into the forthcoming revised RSES, thereby reinforcing the policy support for developments of this nature.

In particular, the document states that:

“Planning for Regional Scale Facilities - The RSES must identify third level education, healthcare and sports facilities to serve the region. Land use and the integration of transport planning are important considerations for the provision of, and access to, such facilities.” [Our Emphasis]

This clear policy direction further supports the strategic importance of the proposed development and underscores the alignment of the proposal with the evolving regional policy framework. As this update is not yet complete, the previous plan is assessed in detail below.

6.3.2 Regional Spatial and Economic Strategy – Eastern and Midland Assembly 2019-2031 (2019)

The RSES is a strategic framework to shape the future development of the eastern region up to 2031 and support the implementation of the NPF. The document also includes a *Metropolitan Area Strategic Plan (MASP)* for the Dublin area. The MASP includes a number of principles, including compact sustainable growth, integrated transport and land use, increased employment density and better alignment of growth. The MASP supports the development of infill sites to achieve compact growth.

The RSES notes that the availability and access to health services are central to creating healthier places. Within Section 9.6 entitled ‘Quality of Life’, it is noted that:

“Gaps in the Region’s healthcare infrastructure, in particular the demand and capacity for primary care, acute care and social care services, need to be addressed.”

Regional Policy Objective RPO 9.23 Provision of Health Services states that:

“Facilitate the development of primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with RSES settlement strategy and core strategies of development plans.” [Our Emphasis].

We would highlight the support for this type of development in RSES. The proposal is fully in line with the aims and objectives of the strategy to provide health care facilities and facilities for older people as our population ages.

The proposed development is submitted to fully accord with all provisions of the RSES relevant to the assessment of the proposed development. The proposed development will contribute toward both arresting the current shortfall in mental healthcare infrastructure

within the region, while also providing care specifically to cater to elderly mental health patients, with the proposal of an elderly care ward being part of this proposal.

6.3.3 Dublin Metropolitan Area Strategic Plan (MASP) (2019)

Contained within the RSES, the MASP aims to provide a 12–20-year framework for sustainable, coordinated population and employment growth across the Dublin region.

The boundary of the Dublin Metropolitan Area (DMA) was established in the *Regional Planning Guidelines (RPGs) for the Greater Dublin Area (GDA) 2010-2022* and the *NTA Strategy for the Greater Dublin Area (GDA) (2016 – 2035)*. There are seven local authorities in the metropolitan area, including all of Dublin City, South Dublin and Dún Laoghaire-Rathdown and parts of Fingal, Meath, Kildare and Wicklow.

To achieve the vision, the MASP identifies a number of guiding principles for the sustainable development of the Dublin Metropolitan Area:

- *“Dublin as a Global Gateway – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements.*
- **Compact sustainable growth** and accelerated housing delivery – *To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built-up areas, supported by improved services and public transport.*
- **Integrated Transport and Land use** – *To focus growth along existing and proposed high-quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of ‘BusConnects’, DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.*
- **Increased employment density in the right places** – *To plan for increased employment densities within Dublin City and suburbs and at other sustainable locations near high-quality public transport nodes, near third-level institutes and existing employment hubs, and to relocate less-intensive employment uses outside the M50 ring and existing built-up areas.*
- **Alignment of growth with enabling infrastructure** – *To promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in water and wastewater, sustainable energy, waste management and resource efficiency.*

- *Social Regeneration – To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.*
- *Identify Future Development Areas – To identify future development areas that may be delivered beyond the lifetime of the RSES, but within the longer-term 2040 horizon set out by the NPF.*
- *Metropolitan Scale Amenities – To enhance provision of regional parks and strategic Green Infrastructure, to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast, as part of the implementation of the National Transport Authority’s Cycle Network Plan for the Greater Dublin Area.*
- *Co-ordination and active land management – To enhance co-ordination across local authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands” [Our Emphasis].*

The proposed development clearly demonstrates the utmost compatibility with these guiding principles, with the proposal seeking to provide a new hospital development within a currently underutilised site, in order to develop it to its full potential. The subject proposal is also located within a location in immediate proximity to population centres as well as national road infrastructure and consistent public transport services, therefore aligning with the principles of increased employment density within appropriate locations and aligning development with enabling infrastructure.

Further to the above, the following policy objectives contained within the MASP are of relevance to this application:

RPO 5.3:

“Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe, attractive street environment for pedestrians and cyclists.”

The proposed development is in fundamental alignment with both of these objectives, with the development, as detailed in the section preceding, to be located within immediate proximity to public transport and cycle/road networks. As detailed in the *Architectural Design Statement* prepared by TOT Architects, the proposed development applies a robust green infrastructure approach that maintains biodiversity, improves air quality, and supports psychological well-being. In turn, the proposed green areas will have an established hierarchy guaranteeing accessibility and security for both service users and the public. These will consist of:

- Public Open Space (maintaining and enhancing the existing walking loop and access to the future Liffey Valley Park) and improving the pedestrian safety of users;

- Open Garden (green lungs connecting the new hospital and the existing buildings, accessible by service users and staff only);
- Private Gardens (secure garden directly accessible from the new hospital by service users and staff only), and
- Private Courtyards (secure private green spaces within the ward areas).

The proposed development is submitted to fully accord with all provisions of the MASP applicable to the development in question. The proposed development sees compact and sustainable growth provided and employment proposed within an existing site of immediate proximity to population centres and high-frequency public transport in line with the key principles of policy applicable at all levels, including the MASP.

6.4 Local Planning Policy

The following section details local planning policy guidance applicable to the assessment of the subject application in the form of the *South Dublin County Development Plan (2022-2028)*²⁵.

6.4.1 South Dublin County Development Plan (2022-2028)

Core Strategy

The purpose of the Core Strategy of the *South Dublin County Development Plan (2022-2028)* is to provide a plan for long-term spatial development of this administrative area, ensuring that land zoning for housing, employment, and infrastructure aligns with national and regional population targets. The following objectives are most applicable to the subject proposal:

CS1 Objective 1:

“To ensure a sustainable and planned allocation of housing and employment growth within the strategic development areas of South Dublin County in line with the provisions of the MASP”.

CS5 Objective 1:

“To focus high-intensity employment-generating uses around high-capacity public transport nodes.”

²⁵ All policy in this section except where explicitly stated otherwise is within Volume One of the subject Development Plan.

As detailed previously within this *Planning Report*, the proposed development ensures the provision of employment within a currently underutilised site immediate proximity to population centres, and high frequency public transport (as well as future public transport upgrades). The proposed development therefore encourages compact growth and development within South Dublin, as is a key aim of the Development Plan and national policy detailed above.

Zoning

The site is primarily zoned as ‘*Objective HA: To protect and enhance the outstanding natural character of the River Liffey*’. There are also a number of land use designations present on the subject land, which are outlined in detail below.

“To protect and enhance the outstanding character and amenity of the Liffey Valley.”

The classes of use related to the land use zoning “*Objective HA-LV*” are addressed in Table 12.13 in Chapter 12.2 entitled ‘*Land-Use Zoning Objectives of the Development Plan*’, and these are listed as follows.

“Permitted in Principle: Open Space;

Open for Consideration: Agriculture, Allotments, Bed & Breakfast, Car Park, Cemetery, Childcare Facilities, Community Centre, Cultural Use, Doctor / Dentist, Education, Embassy, Guest House, Home Based Economic Activities, Hotel / Hostel, Place of Worship, Public House, Public Services, Recreational Facility, Residential Restaurant / Café, Rural Industry- Food, Shop-Local, Sports Club / Facility, Traveller Accommodation;

Not Permitted: Abattoir, Advertisements and Advertising Structures, Aerodrome / Airfield, Betting Office, Boarding Kennels, Camp Site, Caravan Park-Residential, Concrete / Asphalt Plant in or adjacent to a quarry, Conference Centre, Crematorium, Data Centre, Enterprise Centre, Fuel Depot, Funeral Home, Garden Centre, **Health Centre**, Heavy Vehicle Park, **Hospital**; Housing for Older People, Industry-Extractive, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq m, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Off-Licence, Outdoor Entertainment Park Petrol Station, Primary Health Care Centre, Recycling Facility, Refuse Landfill / Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop-Neighbourhood, Social Club, Stadium, Transport Depot, Veterinary Surgery, Warehousing, Wholesale Outlet, Wind Farm, Work-Live Units”. **[Our Emphasis]**.

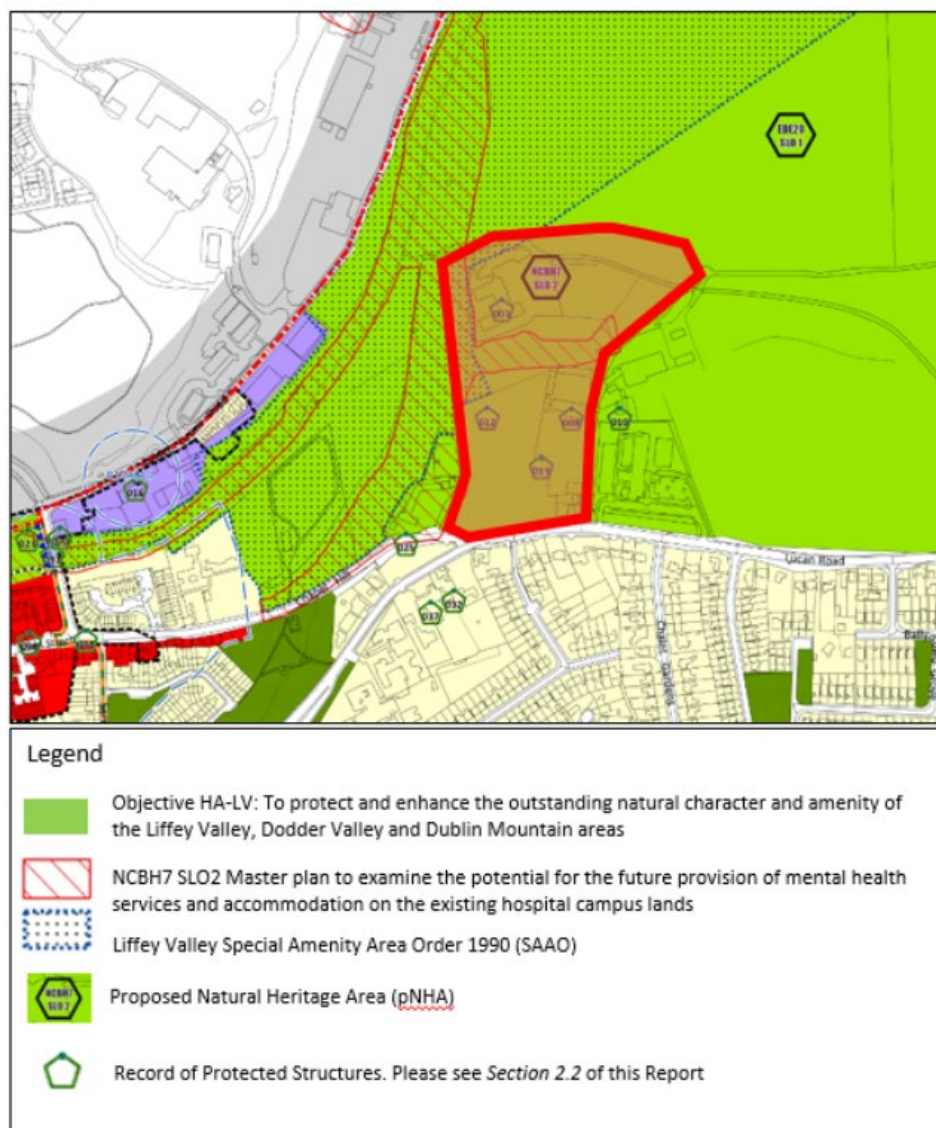


Figure 6.2: Extract from the South Dublin County Development Plan 2022-2028. The subject site is indicated through a red outline. [Source: South Dublin County Development Plan 2022-2028, cropped and annotated by TPA 2026].

The 'HA-LV' land use zoning states that developments such as hospitals are not to be permitted. However, there is the provision to provide developments that are not residential, subject to certain circumstances under Planning Objective 'NCBH7 SLO2'. The development standards associated with the HA-LV land use zoning are further outlined below.

NCBH7 Objective 1: *To restrict development within areas designated with Zoning Objective 'HA-LV' (To protect and enhance the outstanding character and amenity of the Liffey Valley) and to ensure that new development:*

- *does not significantly impact built or cultural heritage assets, sensitive habitats, species, or ecosystem services;*
- *is related to the area's amenity potential;*

- *is designed and sited to minimise environmental and visual impacts; and;*
- *enhances the County's green infrastructure network". [Our Emphasis]*

It is an objective of the Development Plan to ensure all future development within the Liffey Valley not only has regard for but also enhances the receiving environment. The Development Plan has aspirations to facilitate the improvement and expansion of the County's green infrastructure network.

"NCBH7 Objective 2: Within areas designated 'High Amenity – Liffey Valley' ('HA-LV'), non- residential development will only be permitted where it:

- *relates to the area's amenity potential or to its use for agriculture or recreational purposes, including recreational buildings; or*
- *comprises the redevelopment of or extensions to existing commercial or civic uses or the development of new commercial or civic uses within an existing established area of commercial or civic activity; and*
- *preserves the amenity value of the river valley, including its biodiversity value, its landscape value, and views or vistas of the river valley."*

Under *NCBH7-Objective 2*, non-residential development is acceptable in theory if the proposed development is in relation to the extension or the redevelopment of an existing commercial/civic use building. St. Edmundsbury has operated as a hospital for a number of decades and therefore is a well-established use within the Liffey Valley. As outlined above, we believe that the expansion of an existing, well established health care facility use should be considered a non-conforming use under the Development Plan.

6.4.2 Definition of Non-Conforming Use as Per South Dublin County Development Plan (2022-2028)

Section 12.2.1 (VI) of the current South Dublin Development Plan (2022-2028) sets out the definition of non-conforming use, and how the Local Authority wishes to assess development proposals which constitute non-conforming uses as follows:

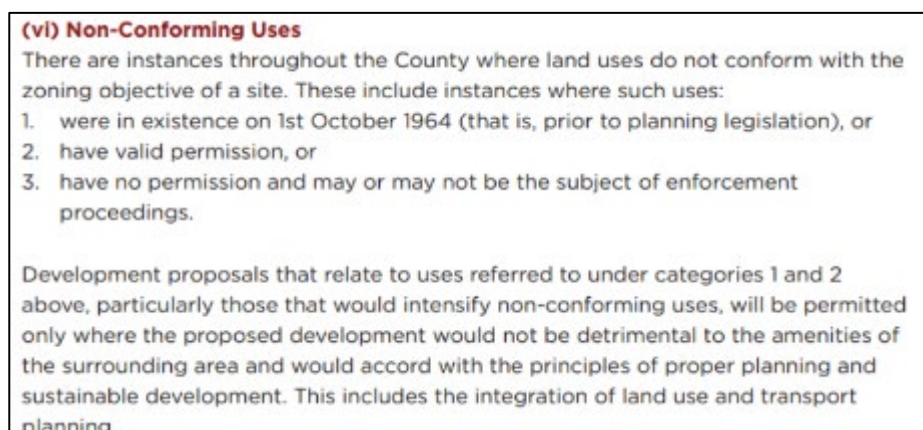


Figure 6.3 -Extract from current South Dublin County Development Plan (2022-2028)).

In this case, as noted in detail above, the established hospital use of the lands fall into Category 1 (i.e., were in existence before 1st October 1964 (i.e. prior to planning legislation) and future proposals “...that would intensify non-conforming uses will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning”

In this respect, it is submitted that the proposed development will have no discernible negative impacts upon the amenities of the local area and would accord with the principle of proper planning and sustainable development for this region as detailed within the following sections. This matter is also assessed in greater detail in the enclosed suite of supporting documentation that demonstrate compliance with relevant policy objectives in a comprehensive and evidence-based manner.

Environmental Considerations

An EIAR has been prepared by JBA Consulting Ireland and submitted with this Report. The subject Report assesses the potential for environmental impacts on several factors, including air, water, soil and heritage quality of/connected to the subject site.

Overall, the Report found no indication that the subject development will lead to any unacceptable degradative environmental impact. An Appropriate Assessment (AA) Screening has also been undertaken and is enclosed in this regard.

Visual Amenity

From the inception of the subject proposal, the required consultants have been involved in order to ensure that negative impacts on the visual amenities of the area have been avoided in regard to the local landscape, considering the sensitive context of the subject site.

It is submitted that the proposed development is to be situated in a manner and limited in height scale and massing in order to ensure that no significant visual impact will arise within the local area.

Residential Amenity

The subject development has been designed with careful consideration for the residential amenities of surrounding established residential neighbourhoods and dwellings within proximity to the subject site. As detailed within the accompanying drawing pack prepared by TOT Architects, the subject application is both situated and scaled in a manner which ensures no degradative impact upon local residential amenities through overbearing and/or overshadowing. A more than adequate separation distance between existing residential properties and the proposed development has also been ensured. In regard to noise pollution affecting residential amenity, it is submitted that noise during the construction stage will be limited by hours of operation and noise during the operation of the development will not create any significant nuisance.

Detailed construction management proposals are included with this application to reduce potential for impact on residential amenity in this regard.

Traffic Impact

The proposed development incorporates a comprehensive and considered approach to traffic and transport, as detailed in the enclosed Traffic and Transport Assessment prepared by Egis. The scheme provides for an appropriate level of car parking, commensurate with the scale and function of the development, together with substantial cycle parking provision to support and encourage sustainable modes of travel for staff and visitors.

A Mobility Management Plan has also been prepared, setting out a range of measures designed to promote modal shift and reduce reliance on the private car. It is submitted that these provisions are consistent with the requirements and objectives of the South Dublin County Development Plan in relation to sustainable transport and accessibility.

In order to assess the potential traffic impacts arising from the proposed development, Egis has undertaken a detailed Traffic and Transport Assessment, informed by established best practice methodologies. The findings of this Assessment demonstrate that the local road network has the capacity to accommodate the development, subject to the implementation of agreed mitigation measures.

In this regard, it is noted that South Dublin County Council has issued correspondence confirming its support for the proposed development, subject to certain conditions. These include the delivery of junction improvement works by the local authority and the requirement for the Applicant to make an appropriate special contribution towards the cost of these works.

Having regard to the foregoing, it is considered that, subject to compliance with the identified conditions and mitigation measures, the proposed development will not give rise to any unacceptable traffic or transport impacts and will integrate satisfactorily with the existing and planned transport infrastructure in the area.

Flood Risk

As noted above, a Site Specific Flood Risk Assessment has been undertaken and is enclosed with the planning application. The site is located in Flood Zone C. It is submitted that the subject Assessment, which accompanies this Report, clarifies that there is no significant flood risk for development on site.

Protected Structures and Heritage

In consideration of the heritage and historical significance of the subject site and the presence of numerous protected structures throughout, heritage-based considerations have been central to the subject's proposed development. In this regard, Carrig Conservation International has been present on the Design Team from inception. As detailed within their AHIA documentation submitted to the Commission along with relevant drawings and particulars, the subject proposal will not have an unacceptable detrimental impact upon the heritage/historical quality of any part of the St. Edmundsbury House or demesne. For ease of reference, these structures are noted overleaf.

RPS Ref.	Address/Location	Description	Sheet
003	St. Edmundsbury House, Old Lucan Road	Three Storey House, Porch with Colonnades, and Out-offices	Map 01
008	St. Edmundsbury House, Old Lucan Road	Barn and Coach House	Map 01
010	St. Edmundsbury House, Old Lucan Road	Detached Two-Bay Two-Storey House and Stable Block	Map 01
012	Off Lucan Road, St. Edmundsbury	Walled Garden	Map 01
013	Wall and Bell Tower, Off Lucan Road, St. Edmundsbury	Uncoursed Rubble Limestone Boundary Wall with Attached Bell Tower	Map 01
028	St. Edmundsbury House, Lucan	Gate Lodge, Pillars & Gates	Map 01

Table 7.1 Record of Protected Structures. [Source: South Dublin County Development Plan 2022-2028, Appendix A: Record of Protected Structures]

Further to this, the following structures are currently registered within the National Inventory of Architectural Heritage:

Reg No.	Structure	Description	Appraisal
11202003	Country House	Detached multiple-bay two-storey over basement house, c.1740, with projecting Doric entrance portico. Rendered, ruled and lined walls with quoins and balustraded parapet. Various replacement windows, set beneath bracketed pediments to the ground floor, and within segmental-headed openings having carved timber decoration to the first floor. Hipped slate roof with lead flashing. Substantially extended and altered, in the early nineteenth century, and again, c.1986. Now in use as a psychiatric hospital	This house, originally considerably smaller, has been much extended and retains elements of the various phases of construction, such as window types and façade enrichments. Still situated in its own mature grounds, with a collection of farm buildings within the grounds.
11202008	Outbuilding	Detached irregular-bay double-height former byre, c.1870. Roughcast rendered walls with various window openings, some blocked, some with timber ventilation	An important part of the estate group, retaining much of its original form and character

		slats. Plain doorways to the south and east walls. Pitched slate roof with ventilators to the ridge. Remnants of stalls and hay loft to the interior	
11202007	Barn	Detached multiple-bay double-height cattle barn, c.1880, with various later pitched-roofed extensions. Rubble stone walls retaining patches of render, with assorted small openings. Large round-headed archways with brick reveals running through each end. Corrugated iron roof on steel trusses. Dovecote to the eastern end. Barn currently unused	This barn is an imposing building associated with the remains of a large farm, probably once associated with the St. Edmundsbury Estate, and indicates the former scale of works.
11202006	Walled Garden	Walled garden, c.1825, with uncoursed rubble limestone boundary wall to south and east, and brick walls retaining patches of lime mortar to north and west. Gateways with granite surrounds and cast-iron gates in the north wall. Remnants of lean-to structures to the north	Associated with St Edmundsbury country house, this walled garden is a valuable surviving element of the estate group. The cast-iron gates are identical to those at the demesne entrance.
11202005	Gates/railings/walls	Uncoursed rubble limestone boundary wall, c.1825, with attached medieval bell tower. Detached single-storey farm building with brick and rubble walls and a pitched slate roof nearby	An important constituent of this agricultural complex- an increasingly rare type in this now suburban area- which retains the archaeological fabric of significance
11201129	Monument	Carved limestone memorial slab, dated c.1807, set into limestone rubble wall. Inscription to the main panel, with low-relief religious imagery to the pediment	A finely executed memorial slab and a very valuable historical document, dating from a period when the Catholic

			church was still under restrictions
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Table 7.2 National Inventory of Architectural Heritage. [Source: myplan.ie 2026]

As noted above, two of the above referenced protected structures have been excluded from the assessment due to the detachment of these structures from the context of the site over time. Please refer to the Carrig Conservation documentation for further information in this regard.

The *South Dublin County Development Plan (2022-2028)* states the following with regard to the development proposals involving officially designated Protected Structures:

Policy NCBH19:

*“Protected Structures Conserve and protect buildings, structures and sites contained in the Record of Protected Structures **and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure, including its historic curtilage, both directly and indirectly**”. [Our Emphasis].*

NCBH19 Objective 2:

*“To ensure that all development proposals that affect a Protected Structure and its setting, **including proposals to extend, alter or refurbish any Protected Structure, are sympathetic to its special character and integrity and are appropriate in terms of architectural treatment, character, scale and form. All such proposals shall be consistent with the Architectural Heritage Protection Guidelines for Planning Authorities, DAHG (2011 or any superseding documents), including the principles of conservation**”. [Our Emphasis].*

NCBH19 Objective 3:

*“To address dereliction and to welcome, encourage and **support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures consistent with RPO 9.30 of the RSES**”. [Our Emphasis].*

NCBH19 Objective 4:

To support alternative uses for Protected Structures, including former institutional sites, in order to provide continued security of the heritage value of these buildings, attendant grounds and associated landscape features. To this end, the relaxation of site zoning restrictions may be considered to secure the preservation and conservation of the protected structure where the use proposed is compatible with the existing structure and where the proposed development is consistent with best practice conservation policies and the proper planning and sustainable development of the area”. [Our Emphasis]

Further to this, the *South Dublin Development Plan (2022-2028)* states the following concerning built heritage:

Policy NCBH1:

“Overarching Protect, conserve and enhance the County’s natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.” [Our Emphasis].

NCBH1 Objective 1:

“To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development.” [Our Emphasis].

Likewise, the Development Plan notes further guidance in regard to the utilisation of existing historic structures within proposed developments:

Policy NCBH24:

“Adapting and Reusing Historic Buildings Support and encourage the reuse and adaptation of historic, traditional, and older vacant and derelict buildings as a key component of promoting sustainable development and achieving compact growth and as a catalyst for the revitalisation of historic village and town centres”. [Our Emphasis].

NCBH24 Objective 1:

“To encourage the repurposing and reuse of older vacant and derelict structures, particularly within towns, villages and Architectural Conservation Areas”. [Our Emphasis].

NCBH24 Objective 2:

“To prohibit demolition or full replacement, where there are re-use options for historic buildings in order to promote a reduction in carbon footprint”. [Our Emphasis].

NCBH24 Objective 3:

“To encourage and support the delivery of projects that repair and conserve historic structures in accordance with national grant schemes for architectural conservation”. [Our Emphasis].

NCBH24 Objective 4:

“To ensure the reuse, adaptation and upgrade of historic buildings is in accordance with conservation principles, including minimal intervention, reversibility, respectful alteration and repair”. [Our Emphasis].

It is submitted that the presence of these structures has informed the subject application, with the subject proposal striving to integrate these Protected Structures into the design and use of the proposed development.

The reuse and integration of these structures within the subject proposal is further detailed within the accompanying *Architectural Heritage Impact Assessment* prepared by Carrig Conservation International, which precisely addresses the integration of each Protected Structure into the subject proposal.

The proposed development thus represents the appropriate reuse, and therefore ‘*conservation in use*’ of these protected structures, thus adhering to the key development plan objectives and requirements of the *South Dublin Development Plan (2022-2028)* concerning heritage and protected structures.

Archaeology

Section 3.4.2 of the *South Dublin County Development Plan (2022-2028)* details the following archaeology-related policies and objectives pertaining to this development:

Policy NCBH13: Archaeological Heritage:

*“Manage development in a manner that protects and conserves the Archaeological Heritage of the County and **avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest**”. [Our Emphasis].*

NCBH13 Objective 1:

*“**To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest** in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document”. [Our Emphasis].*

NCB13 Objective 2:

“To ensure that development is designed to avoid impacting on archaeological heritage, including previously unknown sites, features and objects”.

NCBH13 Objective 3:

“To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately”.

As detailed throughout this *Report*, the conservation of built heritage elements and structures on site has been a key design aim of this proposal. The design of the hospital is rooted in a careful and respectful response to the historic context of the site, particularly in relation to the former St. Edmundsbury estate. Rather than treating the surviving historic structures as passive elements to be preserved in isolation, the development embraces them as active and meaningful components of the new campus, integrating them in ways that ensure their long-term use and visibility. In turn, the proposed development favours

‘*conservation in use*’ as the best approach to ensure the protection of heritage elements on site.

Further to this, it should be noted that Chapter No. 10 of the EIAR submitted with this application, entitled ‘*Cultural Heritage: Archaeology and Architectural Heritage*’, identifies, describes, and assesses the potential direct and indirect effects of the proposed development on known and unknown surrounding archaeological, architectural and cultural heritage landscapes. The assessment is based on extensive research, amalgamating a number of forms of research to identify areas of archaeological/architectural/ cultural significance or potential, likely to be impacted either directly or indirectly by the Proposed Development. An assessment of potential effects, including cumulative effects between the impact of the proposed development and other development (proposed, permitted and existing), is presented, and a number of mitigation measures are recommended where appropriate.

In turn, the proposed development accords with all relevant provisions of the *South Dublin County Development Plan (2022-2028)* concerning the preservation of heritage elements on site.

In conclusion, it is considered that the proposed development, which seeks to deliver a new mental health facility, is acceptable in principle and accords with the provisions of the South Dublin Development Plan (2022–2028) relating to non-conforming uses. The scheme would not give rise to traffic hazard or inconvenience; would not be prejudicial to public health; and would not unduly impact upon the visual, residential or recreational amenities of the area. Furthermore, it would not adversely affect the archaeological heritage or the integrity of any designated Natura 2000 site. On balance, the proposed development is considered to be consistent with the proper planning and sustainable development of the area. Further development plan considerations are outlined briefly below.

Vernacular / Traditional and Older Buildings, Estates and Streetscapes

Policy NCBH21:

“Vernacular / Traditional and Older Buildings, Estates and Streetscapes Ensure appropriate design of new-build elements and interventions in historic buildings and environments”.

NCBH21 Objective 1:

“To retain existing buildings that, while not listed as Protected Structures, are considered to contribute to historic character, local character, visual setting, rural amenity or streetscape value within the County”.

NCBH21 Objective 2:

“To ensure that the redevelopment of older buildings, including extensions and renovation works do not compromise or erode the architectural interest,

character or visual setting of such buildings, including surrounding housing estates or streetscapes". [Our Emphasis].

NCBH21 Objective 3:

"To encourage the retention, rehabilitation, renovation and re-use of older buildings and their original features where such buildings and features contribute to the visual setting, collective interest or character of the surrounding area". [Our Emphasis].

As detailed extensively within this Report, the proposed development incorporates key elements of heritage on-site into the proposed development. Rather than simply preserving these elements, the proposed development embraces them as active and meaningful components of the new campus, integrating them in ways that ensure their long-term use and visibility through their continued use.

Climate Resilience

Section 4.2.3 of the *South Dublin County Development Plan (2022-2028)* details relevant policies and objectives concerning climate resilience as follows:

Policy GI5:

"Climate Resilience Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate". [Our Emphasis].

GI5 Objective 1:

"To protect and enhance the rich biodiversity and ecosystems in accordance with the ecosystem services approach to development, enabling mitigation of climate change impacts, by absorbing excess flood water, providing a buffer against extreme weather events, absorbing carbon emissions and filtering pollution". [Our Emphasis].

GI5 Objective 3:

"To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.

- ***Increase the County's tree canopy cover by promoting annual planting, maintenance, preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.***
- ***Identify suitable sites for new urban trees, including Miyawaki-style mini woodlands, where feasible.***

- *Support the implementation of a coordinated regional approach to the maintenance of trees and support the work of the Regional Steering Group on Tree Management to which South Dublin County Council is a participant.*
- *Promote the establishment of tree trails in public parks across the County.*
- *Promote the planting of new woodlands and forestry within appropriate open space and park locations within the County.*
- *To plant “pocket forests” in tracts of open grassland to act as an oasis for biodiversity.*
- *To recognise the value of mature trees in terms of carbon sequestration and amenity over saplings”. [Our Emphasis].*

GI5 Objective 4:

“To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County’s GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet.”

GI5 Objective 6:

“To provide more tree cover across the county, in particular to areas that are lacking trees, with an emphasis on planting native Irish trees as appropriate”. [Our Emphasis].

GI5 Objective 7:

“To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council’s ongoing SuDS strategy development”. [Our Emphasis].

It is submitted that the proposed development fundamentally aligns with all policies and objectives denoted above, with an overriding objective within the landscape proposal being to enhance the existing biodiversity on site and strengthen green infrastructure links with the surrounding area and to bring a greater connection to nature for all users within the hospital.

The proposed development addresses resilience through both building design and landscape strategy. The low-rise, thermally efficient buildings are designed to mitigate overheating, manage increased rainfall, and withstand more extreme weather conditions over time. In parallel, the site landscape integrates climate-adaptive solutions to protect both the environment and the people using it.

These include permeable paving and an extensive Sustainable Urban Drainage System (SUDS) incorporated throughout the site to reduce surface water runoff and encourage natural infiltration, rainwater drainage strategies that reduce flood risk during heavy rainfall, as well as a robust green infrastructure approach that maintains biodiversity, improves air quality, and supports psychological well-being.

Green roofs are introduced across several buildings to improve insulation and stormwater management while supporting biodiversity.

The planting of native hedgerows and the inclusion of a pond and seasonal wetland area also contribute towards enhancing the existing biodiversity and habitat of the site.

Artificial nesting elements will also be erected on site for both bats and birds.

Concerning tree cover, the proposed development includes the planting of approximately 540 No. new standard and multi-stemmed trees, 2,600 No. native tree whips and 1,640 sqm of native hedge planting. There is a proposed removal of 47 No. trees to facilitate the development. This 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.

Further to this, the development integrates green and blue infrastructure to deliver strong environmental, social, and operational benefits. A Green Space Factor of 0.73 is achieved, which is in excess of the 0.7 requirement. Further to this, it is noted that the initial high-level assessment of the existing site, based on the current ecological mapping by JBA Consulting Ireland, scores 0.62, which is under the minimum required score. This amounts to an approximate 14% increase from existing landscape conditions at the site as existing to the implementation of the proposed development. Please refer to the documentation prepared by DFLA for further information in this regard.



Figure 6.3: Extract from the Landscape Design Report prepared by DFLA Architects. [Source: DFLA Architects, cropped and annotated by TPA 2026].

In turn, it is submitted that the proposed aligns with the *South Dublin County Development Plan (2022-2028)*, in respect to its provisions concerning climate resilience. For further information, please refer to the *Landscape Design Report* and drawings prepared by DFLA Architects, as well as the *Design Statement* and drawings prepared by TOT Architects.

Green Infrastructure

The *South Dublin County Development Plan (2022-2028)* is clear on its commitment to ensuring development does not disturb, but enhance where possible, existing green infrastructure networks within the administrative area of the Local Authority, with the following related objective being of relevance to the application:

Policy GI1:

*“Overarching **protect, enhance and further develop a multifunctional GI network**, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change”. [Our Emphasis].*

Policy GI6:

*“Human Health and Wellbeing Improve the accessibility and recreational amenity of the County’s GI to **enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.**” [Our Emphasis].*

GI6 Objective 1:

“To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses”.

GI6 Objective 7:

“To enhance publicly owned open spaces with further appropriate GI, including nature-based interventions to improve and diversify the services they provide”.

GI6 Objective 9:

*“To investigate the **potential to plant hedgerows** along roads to help mitigate noise and air pollution, and to increase visual amenity and enhance biodiversity”. [Our Emphasis].*

It is submitted that the proposed development sees the application of a robust green infrastructure approach that, as detailed above, improves biodiversity, improves air quality, and supports psychological well-being.

Biodiversity enhancements as detailed within this *Report* include a new water body and seasonal wetland within the proposed woodland area, with public access to a new open space area with interpretive signage outlining the ecology and active biodiversity measures undertaken in the area. Extensive native hedgerow planting is also proposed throughout this area, further increasing the existing biodiversity on site. For further information, please refer to the *Landscape Design Report* and drawings prepared by DFLA Architects, as well as the *Architectural Design Statement* and drawings prepared by TOT Architects.

Landscape

The *South Dublin County Development Plan (2022-2028)* is clear in its intention to both conserve and enhance landscapes, and to protect integral aspects, including heritage and natural features, which give landscapes their value and distinctiveness, as detailed within the following policies:

Policy GI7:

“Landscape, Natural, Cultural and Built Heritage Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the County Heritage Plan.”

GI7 Objective 1:

*“To protect, conserve and enhance natural, built and cultural heritage features and **restrict development that would have a negative impact on these assets** in accordance with the provisions of Chapter 3: Natural, Cultural and Built Heritage of this Development Plan”. [Our Emphasis].*

GI7 Objective 2:

*“To protect and enhance the landscape character of the County by ensuring that **development retains, protects and, where necessary, enhances the appearance and character of the landscape**, in accordance with the provisions of South Dublin’s Landscape Character Assessment and the provisions of Chapter 3: Natural, Cultural and Built Heritage of this Development Plan and Healthy Placemaking (QDP) There are many other relevant national and regional policy objectives. These are referenced by number within individual policies and objectives of this chapter and are set out in full in Appendix 7. 5.2 Successful and Sustainable Neighbourhoods In line with the provisions of Goal 11 of the UN Sustainable Development Goals, the NPF and the RSES, the delivery of sustainable neighbourhoods means creating the right environment which facilitates the delivery of safe and affordable housing, job opportunities, investment in public transport and active modes of transport, creates green public spaces and improves urban planning and management in an inclusive manner. Successful and sustainable neighbourhoods require a range of local services and facilities, including employment, commercial, educational, health, spiritual, civic amenities, and services. The Development Plan has a key role to play in enhancing and facilitating the delivery of successful and sustainable neighbourhoods in South Dublin County in a manner which retains the distinctive identity of each area while also ensuring residents have access to a wide range of such facilities. These facilities should be accessible from residential areas by safe and convenient routes”. [Our Emphasis].*

As detailed above, the landscape proposals within the proposed development include high-value biodiversity measures incorporated into the open spaces. This includes SUDs measures, substantial areas of green roof, a biodiversity pond and wetland area, new woodland and extensive tree planting, among other best practise measures.

Indeed, the objective of the landscape strategy for St. Edmundsbury is not simply to apply greenery to open areas but to place the new healthcare facilities within a cohesive landscape that responds to and integrates the proposed development within the site.

In turn, a key aim of this development is to enable, through planting and landscape strategy, a layout that creates meaningful connections with nature. The proposed landscape plays a therapeutic role in a patient's experience of the facility, through enclosed and wider landscape settings. Courtyards can be subdivided into sub-spaces with a variety of functions such as seating areas, activity areas and herb gardens. The Courtyards also benefit from a variety of micro-climatic possibilities, with full exposure to sun or semi-shaded and fully shaded areas.

The proposed development, it is submitted, fully integrates into the landscape, recognising both the need for its conservation and how it is an important feature in the context of mental health for patients. The proposal integrates built heritage elements into the development, also ensuring their '*conservation in use*'.

Sustainable Neighbourhood Development

Sustainable neighbourhood development is an integral element of the Development Plan, as noted within these policies:

Policy QDP1:

"Successful and Sustainable Neighbourhoods: Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities".

Policy QDP5:

"Connected Neighbourhoods: Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities".

The proposed development aligns with the principles of sustainable neighbourhoods through compact growth, with the proposed development being located in immediate proximity to population centres and high-frequency public transport.

Public Realm

Section 5.2.5 of the *South Dublin County Development Plan (2022-2028)* outlines the approach of the Local Authority concerning the public realm, with the following policy of note set out:

QDP6 Objective 1:

*"To require that all development proposals, whether in established areas or in new growth nodes, **contribute positively to the creation of new and the enhancement of existing public realm**. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also*

Chapter 12: Implementation and Monitoring - Design Statements and Public Realm)". **[Our Emphasis]**.

The proposed development gives careful consideration to the design of the public realm, aiming to create a welcoming and accessible environment that respects both the needs of the local community and the surrounding natural setting.

In addition to a more visible and open Hospital entrance, the proposed development sees the provision of a publicly accessible cafe, located in the refurbished historic farm building, which will serve as a new social hub for the locality and interface with the Hospital.

However, the main hospital building itself is designed to allow public access to selected areas such as the main entrance, café, foyer, and canteen. This approach supports the aim of reducing the stigma around mental health care by encouraging openness and transparency. Internally, the building layout clearly distinguishes between public zones and clinical areas, ensuring privacy and security where required. The retained historic walled garden structure plays an important role in this arrangement, acting as both a visual feature and a marker of the transition between public and private spaces.

For more information, please see the *Architectural Design Statement* prepared by TOT Architects and submitted with this application. In addition, the public pedestrian network within the site is enhanced as a part of the proposed development as noted above. This is explored further below.

Public Open Space

Section 8.7.1 of the *South Dublin County Development Plan (2022-2028)* sets forth the following policies and objectives relating to public open space provision:

Policy COS5: Parks and Public Open Space Overarching:

"Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County."

COS5 Objective 1:

*"To support a hierarchy of **multi-functional, accessible parks and public open spaces across the County.**" [Our Emphasis].*

The proposed development sees public open space concerning the existing walking loop and access to the future Liffey Valley Park maintained, as well as full public access to a proposed woodland open space amenity area within the site, with interpretive signage outlining the ecology and active biodiversity measures undertaken in the area.

In turn, the proposal strikes a balance between providing adequate privacy and peaceful settings for patients while maintaining public access to sections of the grounds and connectivity.

This is done through the proposed development's design layout, establishing a clear hierarchy of spaces to manage visitor access and public circulation.

Building Heights

Section 5.2.7 of the Development Plan sets down guidance in relation to building heights for new development. In respect of the proposed development, the following policy is most applicable:

Policy QDP8:

“High Quality Design – Building Height and Density Guide (BHDG) Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in South Dublin County’s Building Heights and Density Guide 2021”.

Policy QDP9:

*“High Quality Design - Building Height and Density Apply **a context-driven approach to building heights in South Dublin**, as supported by South Dublin’s Building Heights and Density Guide”. [Our Emphasis].*

The proposed development ensures a context-driven approach to height, which in turn ensures the proposal does not lead to degradation of the surrounding amenity. The proposed Adolescent Unit maintains the same height as the building it replaces, therefore leading to increased visual dominance and effect. The proposed 200 No. bed Hospital is kept to a three-storey height in order to integrate historical elements into the development and to ensure the proposal does not lead to an unacceptable degrading visual impact.

Transport and Movement

Section 7.3 of the *South Dublin County Development Plan (2022-2028)* sets forth the following policies, applicable to this proposed development, in regard to transport and movement:

Policy SM1: Overarching – Transport and Movement:

*“Promote ease of movement within, and access to South Dublin County, by **integrating sustainable land-use planning with a high-quality sustainable transport** and movement network for people and goods”. [Our Emphasis].*

SM1 Objective 1:

*“**To achieve and monitor a transition to more sustainable travel modes**, including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car / Van / HGV / Motorcycle)”. [Our Emphasis].*

SM1 Objective 4:

“To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP”. [Our Emphasis].

SM1 Objective 5:

“To ensure that future development is planned and designed in a manner that maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned, and to protect and maintain regional accessibility, in accordance with RPO 8.3 of the RSES”.

The proposed development, by being located in immediate proximity to existing population centres and through being served by high-frequency bus services, is considered to clearly align with the aims of the Local Authority in regard to the transition toward more sustainable travel modes.

Walking and Cycling

Section 7.5.4 of the *South Dublin County Development Plan (2022-2028)* details the policy commitments of the Local Authority in regard to encouraging walking, cycling and other more sustainable modes of travel than car usage, setting out the following policies and objectives applicable to this proposed development:

Policy SM2: Walking and Cycling:

“Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.”

SM2 Objective 3:

“To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas”. [Our Emphasis].

As detailed previously within this *Report*, the proposed development is both located within immediate proximity to population centres and to high-frequency public transport services, therefore encouraging the modal shift.

Further to this, the proposed development supports cycling through the provision of secure bike parking, sheltered facilities, and participation in the Bike to Work Scheme, all of which contribute to a cycle-friendly environment. A dedicated cycle lane within the site will allow bicycles to access the parking safely. All short-term cycle parking is located close to the main entrance of each building for convenience and visibility. The majority are sheltered. All long-term bicycle parking for staff is sheltered and secured. Please refer to the enclosed

documentation prepared by TOT Architects and Egis for further information in this regard including information on mobility management of staff and visitors.

Public Transport

The following policy regarding public transport contained within the *South Dublin County Development Plan (2022-2028)* applies to this proposal:

Policy SM3: Public Transport – General:

“Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.”

The proposed development is situated within immediate proximity of several present high-frequency bus stops, as detailed within this *Report*, with significant proposed public transport infrastructure in the form of the extension of the Luas to Lucan and the BusConnects Scheme set to further improve public transport connectivity to the area. It is also worth noting that the proposed development will see the provision of 104 No. long stay and 56 No. short-stay bike parking spaces in addition to the current facilities provided.

A dedicated cycle lane within the site will allow bicycles to access the parking safely. All short-term cycle parking is located close to the main entrance of each building for convenience and visibility. The majority are sheltered. All long-term bicycle parking for staff is sheltered and secured.

Car Parking

Section 7.10.2 of the *South Dublin County Development Plan (2022-2028)* sets forth the following policies, applicable to this proposed development, in regard to carparking and electric vehicle parking provision movement:

Policy SM7: Car Parking and EV Charging:

*“Implement **a balanced approach to the provision of car parking** with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities”. [Our Emphasis].*

SM7 Objective 1:

“To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility”.

SM7 Objective 2:

“To limit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available”.

It is submitted that an appropriate and balanced approach has been adopted in respect of car parking provision, mobility management and the promotion of sustainable transport modes within the proposed development. The level of parking proposed reflects the operational requirements of the facility, while avoiding excessive provision that would undermine sustainable transport objectives.

The scheme is supported by a comprehensive Mobility Management Plan, which promotes modal shift towards public transport, walking and cycling, in accordance with Development Plan policy. In addition, the provision of secure and accessible cycle parking facilities further reinforces this approach.

Full details of the transport strategy and compliance with relevant standards are set out in the Traffic and Transport Assessment prepared by Egis Consulting Engineers, which accompanies this application.

Furthermore, the development incorporates electric vehicle charging infrastructure, thereby supporting the transition to low-emission transport and aligning with national and local climate action objectives.

Bicycle Parking

Within the Development Plan, Table 12.23 of 12.7.1 sets out the minimum bicycle parking / Storage rates for all new development in the County. Bicycle parking/storage rates are divided into two main categories:

- Long-term: These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access and allow for cargo bikes.

Medical	Clinics and Group Practices	1 per 5 staff	0.5 per consulting room
	Hospital	1 per 5 staff	1 per 10 beds

Figure 6.4: Extract from the South Dublin County Development Plan (2022-2028), detailing long-term and short stay bike parking provision for proposed developments of a medical nature [Source: South Dublin County Development Plan 2022-2028, cropped and annotated by TPA 2026].

- ***“Location: Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road; [Our Emphasis].***
- ***Quantity: A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning***

authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement;

- *Design: **Cycle storage facilities shall be provided in a dedicated facility of permanent construction**, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Refer to the Apartment Guidelines for further details on design requirements, and **[Our Emphasis]**.*
- *Management: **An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking**. Refer to the Apartment Guidelines for further details on management.” **[Our Emphasis]**.*

A dedicated cycle lane within the site will allow bicycles to access the parking safely. All short-term cycle parking is located close to the main entrance of each building for convenience and visibility. The majority are sheltered. All long-term bicycle parking for staff is sheltered and secured.

A *Mobility Management Plan* is prepared by Egis Engineering Ireland and is submitted with this application, which further details the proposed bicycle infrastructure to be provided with this development.

Overall, it is submitted that the proposed development accords with all relevant provisions of the *South Dublin County Development Plan (2022-2028)* in relation to bicycle storage location, quantity and design. The proposed development is in full adherence to its provision of additional bike parking spaces as part of this development.

Healthcare Facilities

Section 12.8.3 of the *South Dublin County Development Plan (2022-2028)* details the following:

“Large medical centres, including Primary Care Centres (PCC) and group medical practices, will be favourably considered in town, district and village and in local centres where appropriate. The Council supports the provision of primary care facilities in accordance with the Department of Health standard of one facility per 7,000-10,000 population. **[Our Emphasis]**.

*All planning applications for health facilities, including medical practices and primary care centres, **should include full details to allow an understanding of the nature and extent of the proposed development, including the following:***

- ***Details of proposed medical or related professional activities (for example, GP, dentist, physiotherapist);***
- ***Any associated commercial activity (for example, pharmacy);***
- ***Proposed number of practitioners and support staff;***

- *Intended hours of operation;*
- *Confirmation of support from HSE (in the case of Primary Care Centres);*
- *Mobility management plan (in the case of large Primary Care Centres). Location, siting and design should take account of the following elements:*
 - *Location that maximises accessibility to public transport, walking and cycling;*
 - *Architectural design that adds visual interest and a sense of place;*
 - *Inclusion of universal design principles;*
 - *Incorporation of climate action measures, including siting and design to take advantage of solar gain and the use of renewable energy and technologies (for example, solar and wind power, heat pumps)". [Our Emphasis].*

The proposed development, it is submitted, accords with the policy extract highlighted above in full. In this regard, details of the proposed medical uses of the site have been adequately addressed. Associated commercial activity in regard to the proposed Café has been detailed. The total number of staff concerning the proposed development is not yet clarified, but the proposal will generate several direct employment opportunities, which will be of benefit to the area during its operation.

It is clear, as demonstrated within the *Traffic and Transport Assessment* and *Construction Traffic Management Plan* prepared by Egis Engineering Ireland and submitted with this application, that the proposed development will not, during its construction and operation phases, lead to any unacceptably detrimental traffic-related impacts within the locality.

Further to this, as detailed within this *Report*, the proposed development, through its location within immediate proximity of population centres and high frequency public transport links, as well as its provision of bicycle parking facilities and linkages to existing cycling infrastructure, encourages the modal shift and ensures the development is aligned with the Council's aims to reduce car dependency.

An inclusive and universal standard of design has been applied to this proposal in order to create social equity and an enhanced user experience for people regardless of physical mobility level.

Concerning climate action, the hospital design incorporates a wide range of passive and active strategies to reduce operational energy use and support long-term environmental performance including: extensive use of roof-mounted solar photovoltaic (PV) panels to generate renewable electricity onsite, a modern, high-efficiency heating and cooling system that minimises fossil fuel reliance, a building layout and envelope optimised for thermal performance, daylight access, and natural ventilation to reduce energy loads, a compact footprint that supports energy efficiency and enhances connectivity with the landscape.

These measures will combine to reduce the operational carbon footprint of the development while improving user comfort and overall energy performance.

In conclusion, the proposed development is supported by all policy provisions of the *South Dublin County Development Plan (2022-2028)*, which explicitly concern the provision of healthcare facilities.

Designations

The subject lands are located in the Liffey Valley. Due to the site's sensitive location, there are several designations that bear relevance in this instance. The Development Plan states the following in relation to the Liffey Valley:

- The valley is a proposed Natural Heritage Area (pNHA);
- The Liffey Valley is identified as a Strategic Corridor, the “*Liffey Valley Corridor*”, and
- There is also a special amenity order in place to preserve the Liffey Valley. This is further discussed in detail below.

Proposed Natural Heritage Area

The River Liffey Valley is a designated proposed Natural Heritage Area (pNHA). Once a site is proposed to be an NHA, it is awarded EU-level protection. The Development Plan outlines several planning objectives regarding pNHAs; these are outlined in further detail below.



Figure 6.5: Liffey Valley pNHA Location Map. The subject site is indicated by a red outline. [Source: EPA Maps, cropped and annotated by TPA 2026]

NCBH4:

“Proposed Natural Heritage Areas: Referral to NPWS and other relevant prescribed bodies. Source: National legislation and APAS;

NCBH4 Objective 1:

“To ensure that any proposal for development within or adjacent to a proposed Natural Heritage Area (pNHA) is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the pNHA, particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive, including their habitats.”

NCBH4 Objective 2:

“To 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.”

An *Environmental Impact Assessment Screening Report (EIAR)* prepared by JBA Consulting Ireland has been submitted as part of the planning application. The EIA Report ensures the proposed development’s impact on the receiving environment is as minimal as possible, outlining appropriate mitigation measures where necessary.

Policy NCBH5:

“Protection of Habitats and Species Outside of Designated Areas: Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected;

NCBH5 Objective 1:

“To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals;

NCBH5 Objective 2:

“To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.”

As a part of the Planning Application, an *Arboricultural Impact Assessment Report* has been prepared by Arbor Care Arborist and Tree Consultant.

It is an underpinning objective of the Development Plan to ensure the protection of natural heritage within the county. The proposed development, in turn, accords with this principle and treats the location’s natural heritage as a key asset to aid the mental healthcare of patients.

Strategic Corridor: Liffey Valley Corridor

The Liffey Valley is classed as *Strategic Corridor 4: Liffey Valley Corridor* within the Development Plan. The valley is described as the city’s green lung and provides opportunities to strengthen the visual and landscape amenity of the county. It is an objective of the *Plan* to protect such amenity; this is summarised as follows.

“Strategic Corridor 4: Liffey Valley Corridor: The River Liffey traverses the northern boundary of the County and is a GI corridor of regional importance. It provides a ‘green lung’ for Dublin City / County and is a key element of the wider regional GI network, running from its origins in the Wicklow Mountains through the plains of County Kildare and through County Dublin into Dublin City Centre, where it enters the sea;

Sections of the River Liffey are designated as proposed Natural Heritage Areas, while the portion within South Dublin County and Fingal County is also subject to a Special Amenity Area Order. These designations reflect the variety of habitats and protected species supported by the River Liffey;

The majestic open parkland setting of sections of the River Liffey Valley provides opportunities to strengthen the visual and landscape amenity value of the valley and create appropriately designed pedestrian and cycle routes that can traverse the County and link with amenities in adjoining counties;

Overreaching Objectives: To protect and enhance the outstanding character and ecology of the Liffey Valley Corridor, recognising its value as a key regional landscape and GI feature that supports important habitats, species, and a range of ecosystem services;

- ***To protect and enhance the recreation and amenity value of the Liffey Valley Corridor, recognising its environmental sensitivities;***
- ***To enhance connectivity with the surrounding regional GI network infrastructure;***
- *To facilitate and support the development of the Liffey Valley as an interconnected network of parklands and support the development of a carefully considered greenway in collaboration with Dublin City Council, Fingal County Council, and Kildare County Council;*
- ***To protect green and blue infrastructure within the River Liffey corridor based on the riparian corridors outlined in the Development Plan Green Infrastructure Map;***
- *To protect and enhance the outstanding landscape character and amenity of the Liffey Valley (see Appendix 9: South Dublin County Landscape Character Assessment, for landscape character details)". [Our Emphasis].*

The Development Plan identifies the St. Edmundsbury site as a core area within the Liffey Valley. In Section 4.3.2, the Plan addresses objectives for strategic corridors, this includes envisioned pathways for the development of the area which are listed below.

"Table 4.1 Strategic Green Infrastructure Corridors;

- *To investigate the potential for enhanced connectivity between Lucan Demesne and St. Edmundsbury lands;*
- ***To investigate the potential for enhanced access to St. Edmundsbury lands from Lucan;***
- ***To preserve and enhance existing woodlands and hedgerows at St. Edmundsbury". [Our Emphasis].***

The proposed development aims to retain the natural attributes of the site and implement mitigation measures where portions of the site will be altered to facilitate construction. This is further outlined within the accompanying *Arboricultural Report* prepared by Arbor Care Arborist and Tree Consultant, as well as the *Landscape Design Report* prepared by DFLA and submitted with this application.

Liffey River Valley and Special Amenity Order

Under the Special Amenity Order, the Liffey Valley is protected for its landscape, visual, recreational, ecological, geological, and built heritage values.

It is an objective of the *Plan* to increase the permeability of the St. Edmundsbury Site by facilitating and promoting increased connections and access to the subject lands.

The proposed development aims to achieve the Council's aspirations regarding St. Edmundsbury, laid out in the *Plan*, to increase connections with the Lucan area and the grounds of St. Edmundsbury.

Section 3.3.4 Liffey River Valley and Special Amenity Order:

*"A Special Amenity Area Order (SAAO) was made for the Liffey Valley by Dublin County Council in 1990 and now straddles the administrative boundaries of South Dublin County Council and Fingal County Council. **The extent of the area covered by the SAOA is from Lucan Bridge to Chapelizod**; the area within the County is identified on the County Development Plan Land-Use Zoning maps that accompany this written statement". [Our Emphasis].*

Policy NCBH7:

*"Liffey River Valley and Special Amenity Area Order Protect and enhance the special amenity value of the Liffey Valley, **including its landscape, visual, recreational, ecological, geological, and built heritage value, as a key element of the County's Green Infrastructure network and implement the provisions of the Liffey Valley Special Amenity Area Order (SAOA)**." [Our Emphasis].*

NCBH7 Objective 3:

"To improve and extend the Liffey Valley Special Amenity Area Order along the Liffey Valley area in South Dublin from the border with Dublin City administrative area to Kildare County and promote its tourism potential, subject to the protection of its biodiversity and ecological value".

NCBH7 Objective 4:

To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA-LV') as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, and Kildare County Council;

the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAOA by:

- *Carrying out a study of the lands that comprise Liffey Valley, inclusive of the Special Amenity Area Order (SAOA) and adjacent lands;*
- *Investigating and determining, as part of the study, viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley*

Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network;

- Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with 'Towards a Liffey Valley Park' (2007) or any superseding plan, including potential permissive access routes.*
- Universal accessibility for all should be balanced with ensuring that environmental and built heritage sensitivities are not negatively impacted upon;*

NCBH7 Objective 5:

"To ensure that development proposals within the Liffey Valley, including local and regional networks of walking and cycling routes:

- avoid impacts on the Valley's sensitive landscape character and ecological network;*
- maximise opportunities for enhancement of existing features;*
- protect and incorporate natural and built heritage features as part of the County's Green Infrastructure network;*
- do not prejudice the future creation and development of interconnected public parklands".*

NCBH7 Objective 6:

"To actively pursue the extension of publicly owned lands, either by direct purchase or land swap within and adjacent to the Liffey Valley Special Amenity Area to create a linked series of parkland and open spaces."

NCBH7 Objective 7:

"To work in collaboration with the owners of lands along the length of the river to seek to provide appropriate public access."

The proposed development includes adequate provision to increase public accessibility to the St. Edmundsbury grounds, as detailed extensively within proceeding sections of this *Report*. It is an underpinning value of the proposed development to ensure the surrounding environment is protected and enhanced. The St. Edmundsbury grounds are a key aspect of the River Liffey Valley, and the redevelopment of the site has been mindful of such.

Tree Protection

Section 3.3.6 of the *South Dublin County Development Plan (2022-2028)* concerns tree protection, detailing the following objective:

NCBH11 Objective 3:

“To protect and retain existing trees, hedgerows, and woodlands which are of amenity and/or biodiversity and/or carbon sequestration value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.”

The proposed development is fully cognisant of the role the natural environment surrounding St. Edmundsbury Hospital has played, and continues to play, in the mental healthcare of patients.

The proposed development aims to retain the natural attributes of the site and implement mitigation measures where portions of the site will be altered to facilitate construction. This is further outlined within the accompanying *Landscape Design Report* prepared by DFLA Architects and submitted with this application.

Development of the Wider St. Edmundsbury Lands and Lucan Area

The *South Dublin County Development Plan 2022-2028* contains several policies that relate to the development of the wider Lucan area and the St. Edmundsbury site; these are discussed in further detail below.

The subject site is within the *Masterplan NCBH7 SLO 2*, the *Plan* provides the provision for the future development of the Mental Health Facility on site. It is an objection of the *Plan* to ensure the expansion of the hospital can be achieved while ensuring the preservation of and proper regard to the surrounding environment and existing character.

NCBH7 SLO 2:

“To work in collaboration with the owners of St Patrick’s Hospital lands at St Edmundsbury, Lucan, in the preparation of a Masterplan to examine the potential for the future provision of mental health services and accommodation on the existing hospital campus lands. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles and the need to provide appropriate public access including an area of accessible public realm within the lands and connectivity to adjacent lands to further the overall objective of developing a Liffey Valley public park”. [Our Emphasis].

The Development Plan states that it is an objective of South Dublin County Council to facilitate the development of the St. Edmundsbury site. The Council has provided the scope to assess and work together with the owners of St. Edmundsbury to expand the existing hospital facility on site. In this regard, as noted above, the masterplan approach to the lands was agreed with SDCC over several years of consultation with the local

authority. It is an objective of the Council to ensure that adequate public access is provided to the St. Edmundsbury site. Planning Objective *EDE20 SLO1* outlines the following.

EDE20 SLO 1:

“To work in collaboration with the owners of lands at St. Edmundsbury, Lucan, to seek to provide appropriate public access to these lands in the Liffey Valley.”

The proposed development includes plans to ensure increased connections, where appropriate, between the St. Edmundsbury Site and the Lucan area. This is further outlined in the accompanying *Architectural Design Statement* prepared by TOT Architecture, as well as the Landscape Masterplan and Report prepared by DFLA Architects and submitted with this application.

The County follows an urban hierarchy with Lucan forming one of the larger centres. It is key to ensure the continued delivery of essential services and developments that boost economic activity to drive growth in the urban environment. The Development Plan addresses expected growth targets for the settlements of Lucan, Adamstown, and Palmerstown as one area. In *Table 11* of the *Core Strategy*, it is stated that the area’s population is expected to increase from 59,000 people in 2016 to c. 68,483 in 2028. This is a 21% increase. As the area grows, there is a need to increase the availability of essential services and employment in the greater Dublin area.

In Figure 10 of the *Core Strategy* of the *South Dublin County Development Plan*, Lucan is identified as an ‘Existing Urban Centre within Dublin City and Suburbs’.

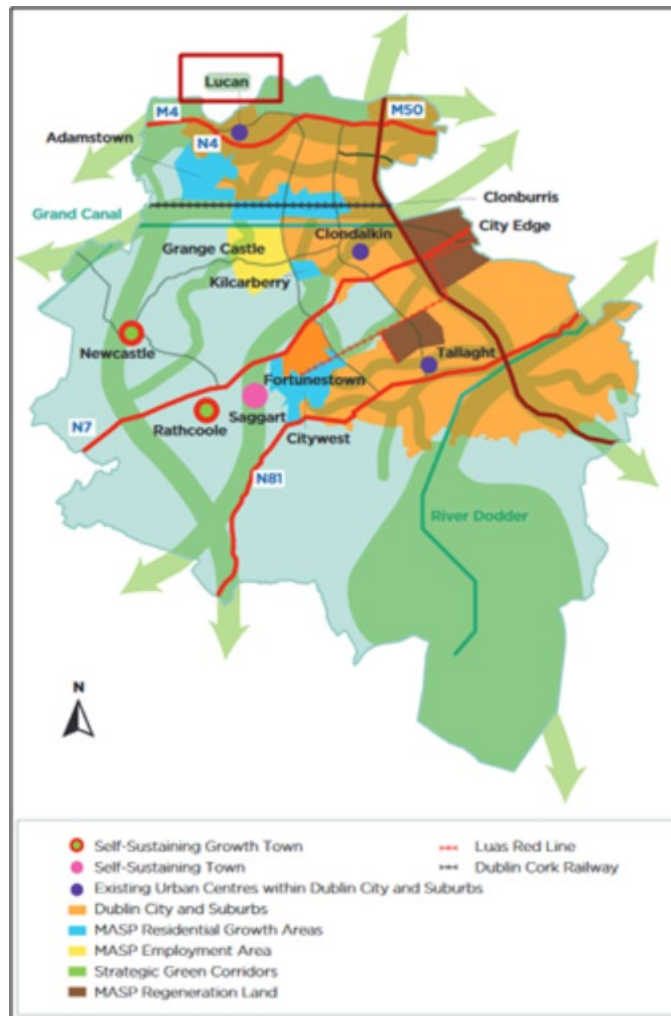


Figure 6.6: South Dublin County Core Strategy Map (2022-2028). Subject site indicative of red outline. [Source: South Dublin County Development Plan (2022-2028), cropped and annotated by TPA 2026].

“Dublin City and Suburbs: international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture, and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment”. [Our Emphasis]

Lucan is considered to be a level 3 district centre, well connected with high-frequency bus routes, the Dublin-Kildare rail line services, and is located c. 14 km to the west of Dublin City, accessed by the N4. In the Development Plan, the town is considered to be an employment hub for the surrounding lower-density suburban neighbourhoods. There are future proposals to extend the Luas line to Lucan from Dublin City and to implement an upgrade to the Kildare line involving electrification and high-frequency commuter services.

SM3 Objective 2:

“To facilitate and secure the implementation of major public transport projects as identified within the NTA’s Transport Strategy for the Greater Dublin Area (2016-2035) as updated to 2042, or any superseding document, including BusConnects, the DART expansion programme along the Kildare route,

the opening of the new rail station at Kishogue and the Luas to Lucan; [Our Emphasis].

SM3 Objective 16:

“To support a review of bus corridors in the N4 environs to expand into the commuter belt towns of bordering County Kildare with a view to meeting future demand of the surrounding Lucan and Adamstown area; [Our Emphasis].

Table 7.4 Park and Ride Proposals: (N4 Bus Corridor):

“Availability of site for the provision of park and ride to be investigated, including potential for Park and Ride at location on N4 immediately adjacent exit 4A, and subject to this location being acceptable to the NTA;

SM3 Objective 19:

“To promote the delivery of the Luas to Lucan and facilitate the reservation of any identified or emerging route”.

The planned expansion of the Luas to Lucan will further increase connectivity to Lucan and promote economic growth. The proposed development would benefit from this increased connectivity, but it must be stated in the interest of clarity, is not reliant on such.

It is our opinion that the proposed development achieves the objectives outlined in the *South Dublin County Development Plan (2022-2028)*. The development of the St. Edmundsbury site is identified as an opportunity to enhance connections between the Lucan area and the River Liffey Valley, improving the area’s green network and utilising the amenity of the River Liffey Valley to its full potential. The development of the St. Edmundsbury site is outlined in planning objectives EDE20 SLO 1 and NCBH7 SLO 2. The Council has taken into consideration the possibility of the hospital expansion and is prepared to work in conjunction with the owners to ensure the site is developed to benefit the wider Lucan area through their own development plan policy support.

As detailed extensively throughout this section, the proposed development fundamentally aligns with the core strategy of the *South Dublin County Development Plan (2022-2028)*, in proposing a much-needed form of development, within an appropriate area, situated in immediate proximity to both population centres and high-frequency public transport. The proposed development is of adequate scale and integrates into the surrounding environment and landscape, ensuring no unacceptable effect upon either stemming from the development. Further to this, through the reuse of historic elements and protected structures on site within the proposed development, the proposal ensures that built, historic and architectural heritage elements of St. Edmundsbury are protected and indeed integrated into the development, ensuring their restoration and long-term conservation through use. The proposed development sees the provision of an adequate quantum of car and bicycle parking and fully accords with the relevant policies, objectives and overall development management standards of the *South Dublin County Development Plan (2022-2028)*.

Having regard to the policies and standards prescribed at the local level, and the rationale for the nature of the proposal as discussed above, it is submitted that there are several significant planning gains associated with this application which can be considered to represent the proper planning and sustainable development of the subject site. We contend that the proposed development is fully in accordance with the proper and sustainable development of the area.

6.4.3 Proposed Variation No. 2 to the South Dublin County Development Plan (2022-2028)

As noted above, it is submitted that, at this time of writing, the land located to the immediate east of the subject site of this application is proposed to be rezoned by South Dublin County Council, by way of variation to the *South Dublin County Development Plan (2022-2028)*. The purpose of the proposed variation is to respond to recent changes in National planning policy, namely the publication of the *National Planning Framework First Revision (2025)* and the publication of Ministerial Guidelines published under Section 28 of the *Planning and Development Act 2000 (as amended)*, which seek an increase in residential zoning nationally.

In turn, the proposed variation, as highlighted below, sees a change of zoning designation from Objective – HA (to protect and enhance the outstanding character and amenity) to Objective – RES – N (to provide for new residential communities in accordance with approved area plans).

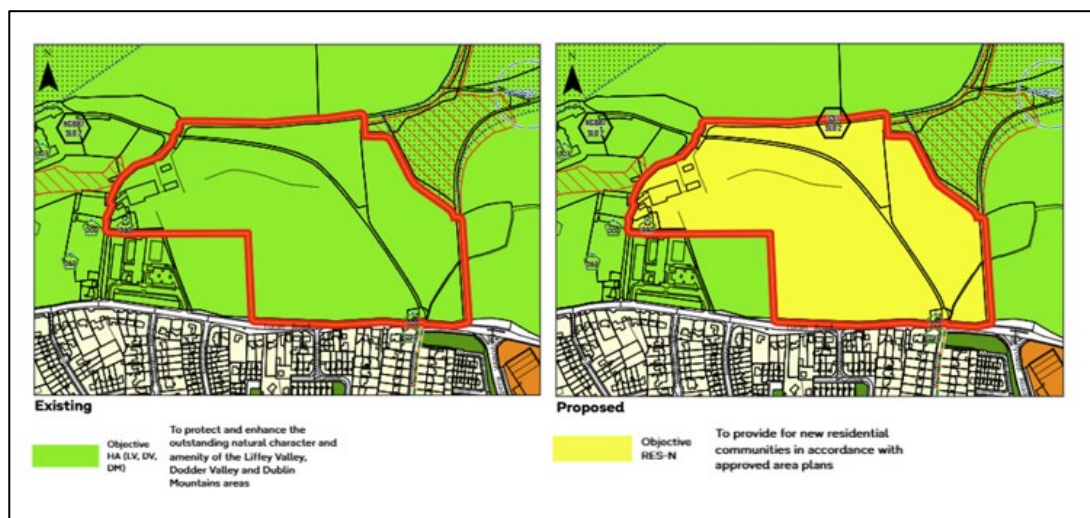


Figure 6.7 Extract from proposed variation of the South Dublin County Development Plan (2022-2028). The subject site is indicated through a red outline. [Source: South Dublin County Development Plan (2022-2028), cropped and annotated by TPA 2026].

While it is worthwhile to bring this variation to the attention of the Commission, it is submitted that whether the proposed zoning change is enacted or not, neither outcome would negatively affect the suitability of lands within St. Edmundsbury for development of the nature and scale proposed.

7.0 ASSESSMENT

7.1 Is the Proposal Required?

As outlined in great detail above, it is submitted that the proposal represents the necessary and needed provision of development of a proposed new Mental Health Hospital Facility and associated facilities, in the grounds of the existing St. Edmundsbury Hospital site in Lucan, Co. Dublin.

As detailed within this *Report*, there is a clear and recognised need for the provision of mental healthcare facilities in the face of both increasing demand and a current shortfall of facilities of this nature. As detailed previously within this *Report*, there are also clear and established trends of increasing mental health issues concerning younger individuals. As detailed within this *Report* and the accompanying EIAR submitted with this application, there is a clear shortfall of facilities of this nature within the Greater Dublin Region. There is, therefore, a clear and established requirement for the creation of care facilities of this nature and of scale within the most suitable of sites.

Concerning the subject site itself, it is demonstrated to be most suitable for development of this nature, given the current mental healthcare use of St. Edmundsbury Hospital, and the site's connected nature to population centres, roads, infrastructure and public transport.

Further to this, as detailed previously within this *Report*, historically, the entirety of the lands of the land within St. Edmundsbury House and demesne were intrinsically linked to the operation of the hospital, and so the proposal seeks to continue this historic use within a most suitable site.

It is therefore submitted that the subject proposal is both necessary in regard to the national interest to expand much-needed mental healthcare facilities and that the proposal is also located within the most appropriate of sites.

7.2 Does the Proposal Align with Relevant Planning Policy?

It is submitted as extensively detailed within the previous section of this *Report* that the development of this subject site is to align with relevant policy documents from the local to the national level, which preside over this development with a more than sufficient justification provided about the proposed use on this site.

Concerning national policy, it is submitted that the proposed development aligns with various documents, including the *Revised National Planning Frameworks* and *Programme for Government*, which are clear in their support for the increased provision of mental healthcare services and facilities. Further to this, through utilisation of an appropriately located site, which is located close to population centres and in proximity to operational and planned high-capacity public transport services, the proposed development aligns with the vision of compact growth and utilisation of sites with capacity within urban environments, as advocated under national planning policy and guidance.



With regard to regional planning policy, the proposed development aligns with all relevant policy provisions within the *Spatial and Economic Strategies – Eastern and Midland Assembly 2019-2031*, and the *Dublin Metropolitan Area Spatial Plan* contained within. The proposed development accords with the aims of both documents concerning the need to address gaps in the region’s healthcare infrastructure and to ensure the provision of such infrastructure within urban and connected areas.

In our opinion, the proposed development, it is submitted, does not materially contravene any other policy contained within the *South Dublin County Development Plan (2022-2028)*, with the proposal in accordance with the current use of the Hospital and the historic use of the wider site. The proposed development integrates protected structures on site into the development, ensuring their refurbishment and protection through conservation in use. However should the Commission consider this development to be in material contravention of the proposed development, we believe that a sufficient rationale and justification for same has been provided above and in the enclosed documentation.

Further to this, the preservation of green space and biodiversity is central to the proposed development, with the proposal seeing a robust green infrastructure approach that maintains biodiversity, improves air quality, and supports psychological well-being. In turn, each policy objective applicable to the receiving environment is adhered to in full.

The development further adheres to the Development Plan concerning various matters, including parking, public transport, and traffic impacts, with the layout proposed ensuring DMURS compliance and a parking provision of bike and car, adhering to development plan standards.

Having regard to the rationale put forward concerning the material contravention of the site’s zoning, for all relevant policy for the site as set out in the *South Dublin County Development Plan (2022-2028)*, all relevant policy at regional and national level, it is considered that, the proposal would not seriously injure the visual amenities of the area, would not have a detrimental impact on architectural heritage or the environment, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be proper planning and sustainable development of the area.

7.3 Are There Any Unacceptable Negative Effects Stemming from the Proposal?

It is concluded that the proposed development will not lead to any unacceptable degradative effect upon any local amenity, whether it be residential, ecological, heritage-based, etc. Rather, it is assumed that the proposed development will have a positive impact on the site and wider vicinity in regard to services provided, as well as the significant biodiversity gain set to occur from landscaping and planting strategy which forms part of this application.

As detailed previously, this team includes specialists in fields of ecology, town planning, and heritage-based concerns, given the location of the site within an architectural conservation area. In turn, it is submitted that these applications will be designed in a manner that ensures compliance strict compliance with all best relevant policy and best practice for development of this nature and setting.

Concerning ecology, the *Ecological Impact Assessment Report* have been prepared by JBA Consulting Ireland and submitted with this application, as well as a range of other comprehensive assessments, illustrating that the subject application will not have an unacceptable degradative effect, either by itself or in combination, upon European Sites or the receiving environment.

Ensuring that the proposed development does not have unacceptably degradative effects upon the residential amenities of surrounding residential development has been a key design aim since the inception of the project. As such, the proposed development abides by key design criteria in this regard contained in both local and national guidance, concerning scale, massing, overshadowing, window-to-window separation requirements and other elements. In turn, the proposed development has been designed in accordance with all applicable guidance and ensures that the amenities of surrounding residential areas are protected.

9.0 CONCLUSION

In conclusion, it is respectfully submitted that the proposed development represents a development of exceptional planning merit, delivering a critical piece of healthcare infrastructure of national and regional importance on an established institutional site. The proposal will provide a modern, purpose-built mental health facility, addressing a clearly identified and pressing deficit in mental healthcare provision across the State. In doing so, it will support the delivery of Government policy, including Sláintecare, by facilitating enhanced capacity, improved patient outcomes and the consolidation of services within a high-quality therapeutic environment. The development will also ensure the long-term resilience and adaptability of mental health services, having regard to projected population growth and evolving healthcare needs. The subject site represents a uniquely suitable location for such development, given its longstanding healthcare use, its spatial capacity, and its accessibility to the wider metropolitan area. The proposal optimises the use of these lands in a manner that is both sustainable and consistent with the overarching objectives of national, regional and local planning policy.

It is further submitted that the design of the scheme has been carefully considered, ensuring the sensitive restoration, integration and active reuse of Protected Structures, thereby safeguarding the architectural and historical significance of the site while enabling its continued and enhanced use. The landscape strategy and provision of substantial open space further contribute to the quality of the development, creating a therapeutic setting that is integral to patient care and well-being. Having regard to the comprehensive assessments undertaken, including environmental, transport and heritage considerations, it is demonstrated that the proposed development will not give rise to any significant adverse impacts and will not seriously injure the amenities of the surrounding area. Rather, it will contribute positively to the area through the delivery of essential social infrastructure.

In the context of its clear strategic importance, its strong alignment with policy at all levels, and the established use and suitability of the site, it is submitted that the proposed development constitutes proper planning and sustainable development. Accordingly, and in circumstances where any material contravention may be identified, it is considered that there are compelling and robust grounds to justify the grant of permission. The development is of national strategic importance and delivers significant social benefit to the State.

It is therefore respectfully requested that An Coimisiún Pleanála give favourable consideration to the proposed development.

Yours sincerely,



Órla Casey
Associate
Tom Phillips + Associates



Appendix A – Letter of Comfort - SDCC

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

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