**Cllr. Adrian Henchy**

**Submission in respect of An Bord Pleanála planning application REG. REF. PL06F.PA0037, WHICH COMPRISES OF A STRATEGIC INFRASTRUCTURE DEVELOPMENT FOR THE PROPOSED NATIONAL FORENSIC MENTAL HEALTH SERVICE (NFMHS) HOSPITAL AT ST. ITA’S HOSPITAL, PORTRANE, COUNTY DUBLIN.**

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# **INTRODUCTION**

# Councilor Adrian Henchy

Was elected to Fingal County Council in May of this year. My full time employment is that of a Community Mental Health Nurse working at the Mater Hospital. Since my Election in May I have joined the Board of the HSE regional forum.

Born and raised in Portrane where I grew up on Portrane Avenue with both my parents and grandparents worked as nurses in St. Ita’s Hospital. I am still a resident on the Peninsula and very much involved within the Community not only through politics but also my volunteering across numerous Sport Clubs and Organisations. I would like to note that I previously submitted an observation on the variation plan on the 29th of January 2014.

# THE PROPOSED NATIONAL FORENSIC MENTAL HEALTH HOSPITAL

I am cognisant of the long history of Mental Health provision at Portrane dating back over 100 years with St. Ita’s forming the heart of the Portrane and greater Donabate community offering employment and a social hub to the area throughout this 100 year plus history.

I am fully supportive of the location of the proposed new National Forensic Health Hospital in this current planning application, acknowledging it’s long history and culture and I believe the location of the National Forensic Hospital at St. Ita’s Portrane will be a positive development for the locality. The redevelopment of the St. Ita’s complex will bring about renewal to the area as a whole, and the proposal will bring positive benefits for the economy and social life of Portrane and Donabate.

I, as a locally elected Councillor recognize that the location of the National Forensic Hospital at Portrane is both sustainable from a cultural and heritage perspective, given that St. Ita’s Hospital formally an Asylum or the Mentally ill, was constructed and run as a Psychiatric Hospital up until earlier this year, which demonstrates a long local culture and history which is sympathetic and supportive community and therapeutic location for the new National Forensic Hospital.

Notwithstanding this support, I do have serious concerns regarding the proposals and would specifically request An Bord Pleanála to address the following topics which I have concerns about and identified here in this submission elaborated upon further in this report in the following chapters:-

1. Construction Phase, Access, Roads.
2. Community Gain
3. Operations of the New Hospital / Plans for the old Hospital
4. Forestry and Drainage
5. Residents of Portrane Avenue and Car Parking
6. The Local National schools
7. St Ita’s and the Walled Garden

Whilst I recognize that the location of National Forensic Hospital at Portrane will bring about a sizeable benefit during and post construction to the local community and as an organization, In recognizing this opportunity for the community I would want to see this development of the National Forensic Hospital done in a manner which is sustainable and knits tightly with the local economy and community of Portrane and Donabate in order to bring the maximum benefit to all in the long run, creating a whole and inclusive community, where the treatment of mental illness is done as an inclusive and holistic project involving the community and HSE working in harmony as they have done so throughout the history of the provision of Mental Health care at St. Ita’s Portrane to date for the last 100 years.

The National Forensic Hospital project will define Portrane and Donabate for the next 100 years and it is imperative that An Bord Pleanála insures that the project is done in a manner that respects the existing community, its specialist heritage and culture and its desire to see the delivery of the NFMH in a fair and sustainable manner for the next 100 years.

# Construction Phase, Access & Roads

I am quite concerned that Section 6.5.1 ‘Construction phase’ of the EIS states: “The following temporary local impacts during the construction phase have the potential to affect the local residential, and working community, increased vehicular traffic; increased noise, dirt and dust generation; temporary localised severance, however, insufficient detail is provided on the scale of these impacts that are referred to as “temporary”, but will last no less than three years. Para. 60 states approximately three years. Therefore I am not reassured by statements such as: “While temporary inconvenience may be caused to the existing communities in the area, these impacts will be limited to the temporary construction period. “The construction phase therefore is considered likely to have a slight but short-term negative impact on the immediate local population of the area”.- Para. 6.6.1 ‘Construction phase’ of the EIS states: “The proposed development does not have the potential to result in any significant negative impacts on population and community during the course of construction. Any perceived negative impacts on the immediate local population will be short term and temporary in nature. No remedial or reductive measures are therefore required beyond normal noise and construction mitigation that are outlined elsewhere within this EIS”. As a Resident in the Area and a Local Councillor in Donabate & Portrane on whose local rural roads all project traffic is proposed to travel I am not satisfied with this assessment, which appears to focus only on the construction compound itself and pays little heed to the impact that servicing this project on local rural roads will have in the absence of the as yet un-built distributor road. The EIS takes the view that it is not necessary for the project to seek to provide any measures to reduce the impacts of construction traffic arising from the project; the view appears to be that the project should take precedence over all other uses of local rural roads by the community.

Most members of the community who have reviewed the construction management plans in respect of traffic are left overwhelmed by the sheer scale of the traffic proposed. I have reviewed Volume 2 of the EIS, the Draft Construction Management Plan and the submitted Mobility Management Plan. I do not find any reassurance in these documents with respect to construction traffic proposals and mitigation measures. I ask how many trips will the community have to tolerate on what are local rural roads through the village and down to the site making our village intolerable with traffic. The HSE have submitted a planning application to seek permission to build the National Forensic Mental Hospital Scheme beside the existing St. Ita’s Facility in Portrane The application appears to suggest that construction and operational phase traffic will use the existing local road network – NO modifications are proposed despite the fact that Fingal County Council has already identified that the current traffic levels, existing road network issues and expansion of the local community necessitates the inclusion of a proposal for a new relief road in the local area development plan. As a representative of the local community I am extremely concerned at this approach within the planning application given that the proposed construction phase haul route crossing over the railway bridge runs through the village, entrance to the educational campus (main route for the Secondary School and a primary school), passing by the local scout den, Montessori ,Community Centre and then passing various entrances too large Housing estates followed by two primary Schools and the entrance to both St Ita’s AFC and St Pats GAA club before arriving at the desired destination.

The applicant does not address the impacts that vibration from trucks and HGVs using local roads for access to and from the site will have on local homes, schools, businesses, etc. This deficiency needs to be addressed given the volume of construction traffic proposed to serve the site on existing poor quality road infrastructure. This proposal also as set out will as a result guarantee that the villages of Portrane and Donabate will be permanently at maximum traffic capacity at busy times with the schools/rush hours to work with existing traffic and then on top of which it is planned to take up the slack times with a full flow of construction traffic from the proposed NFMH.

In the Application it states that construction related traffic movements will take into account the opening hours of local schools so as to avoid undue congestion on the local road network”; there is no way for the contractor to guarantee this due to the involvement of sub-contractors and there is no way for this to be enforced. I am very concerned and consider that the applicant should be required to propose an alternative haul road/route other than the use of this specific route. The proposal will seek to reduce construction traffic impact on Portrane Village by using the existing FCC Waste Water Treatment Plan access/haul road (along the southern boundary of the HSE lands)”. This proposed haul road does not address the problem of the impact that trucks will have on the route.



I would have grave concerns about traffic disruption at Donabate Railway Bridge, if it is used to route all project construction traffic to a proposed new haul road across Fingal County Council lands at Ballymastone accessible via New Road. If traffic lights are introduced at the bridge as part of a traffic management system, it will result in very serious congestion for residents, road users and emergency services who use this single access road. If traffic is congested by increasing volume and frequency of heavy trucks using the Donabate railway bridge, there are serious concerns regarding emergency vehicles gaining access to the peninsula to respond to the needs of the existing community.



# The proposed development will not be the only development using the roads:

I would like also to note that other planning applications have been granted in the area, and other land has been zoned, in recent years which will also be trying to use the same bridge at the same times. If we use zoned land as an indicator of possible development in the Donabate / Portrane area in the coming years, it is notable that land for 5525 potential new residential units remained zoned between 2005 and 2011 and will continue to be zoned until 2017 to 2019.Therefore I request An Bord Pleanála to make the following conditions in relation to traffic management to alleviate the burden of this traffic on the community of Donabate Portrane as follows;

**Option A**

Completion of the outer Ring Road in advance of Construction.

**Option B**

Widening of the approach road to bridge and Construction of the haul road on FCC land from the New Road in Donabate.

- Traffic Management plan for the duration of the Construction with a liaison Officer.

Fingal County Council own the lands indicated in the attached map, which stretch from the New Road, Donabate north to the St. Ita’s Demesne complex. The HSE/applicant should be required to create a haul Road/temporary construction road from the New Road to the construction site over this Fingal County Council lands for the duration of the project for the sole purpose of rerouting the access of the construction traffic to the site. This would have the effect of removing the construction traffic from the Village.

# Community Gain

I would like An Bord Pleanála to note that the proposed community gain as set out by the HSE/applicant is effectively miniscule and could be construed as a disrespectful gesture to the local community if taken as literal.

This supposed community gain has been represented by the applicant that the community of Donabate Portrane will gain by having the HSE giving over leases to a soccer club that has played on its site upwards of 80 years and giving a lease to another club Portrane Athletic Club on its lands which was originally swamp land until the same club reclaimed these lands, in other words the HSE/applicant is going to allow two soccer clubs to use lands that it already uses, cannot be misconstrued as community gain in the context of the relocation of the new NFMH at St. Ita’s Portrane.

I would ask that, for the reasons set out below, An Bord Pleanála disregard the list of items the applicant purports to represent “community gain” and instead note the following

I have been advised in respect of the Board’s decision that when deciding to grant permission for strategic infrastructure development, the Board may attach conditions in the normal manner. Conditions may include a condition providing for ‘community gain’. Such a condition may require the construction or the financing, in whole or in part, of a facility or the provision of a service in the area in which the proposed development would be situated and which the Board considers would constitute a gain to the community.

\_ Section 37 (G) (7) of the Strategic Infrastructure Act 2006 states:

Without prejudice to the generality of the Board’s powers to attach conditions under subsection. The Board may attach to a permission for development under this section a condition requiring the construction or the financing, in whole or in part, of the construction of a facility, or the provision or the financing, in whole or in part, of the provision of a service, in the area in which the proposed development would be situated, being a facility or service that, in the opinion of the Board, would constitute a substantial gain to the community I understand that the Act also states in Section 37 (G)(8):A condition attached pursuant to subsection (7)(d) shall not require such an amount of financial resources to be committed for the purposes of the condition being complied with as would substantially deprive the person in whose favour the permission operates of the benefits likely to accrue from the grant of the permission. However, I would like to note how the requested community gain or community dividend would represent a small percentage of the project’s overall budget. I would like to note that in requesting a community gain contribution, it is doing so in the context of the fact that this Strategic Infrastructure Development is, apparently, exempt from the requirement to pay development contributions to the planning authority. The proposed community gain would, in my opinion amount to considerably less than such levies would have been.

I believe the Community gain set out within the application is indeed not community gain. It is my strong belief the football clubs leases are not a community gain from this project. As noted elsewhere in this submission, these leases have nothing to do with this project and would exist regardless of whether the development was being proposed or not. It is my belief that both Clubs have been treated poorly and with respect to Portrane Athletic Club they have had no lease in place for a number of years and therefore could not apply for any grants. Football clubs leases are not a community gain from this project. It should also be noted that both clubs have invested a lot of resources into these grounds over many years and indeed in the case of Portrane Athletic substantial financial resources were invested into their grounds of up to €200,000.

I would like to note the following observations with respect to the proposed Community Gain

1. Local Football Club Leases: For the reasons given above, these leases do not constitute a community gain arising from the current project.

2. Commemorative Plaque: I am very disappointed by the applicant’s proposal to provide only a commemorative plaque as part of Community Gain.

3. The rejuvenation of St. Ita’s: In so far as the applicant proposes to do so, i.e. ignoring the extent of mothballing of buildings proposed, development at St. Ita’s is welcome, so long as the impacts on the community are minimised. But the planning application cannot reasonably be seen as a community gain at present as presently conceived, it will take from and not contribute to the community.

4. Re-routing & enhancing public right of way through the St. Ita’s Hospital complex: I do not consider the provision of non-legal proposals to provide walking routes through the site sufficient to replace legally defined pedestrian Rights of Way as a neutral impact but an impact which removes a legally held right. I accept that the location of the proposed NFMH will cause the disruption to the existing public rights of way through the St. Itas complex due to the new NFMH being constructed in the middle of the path of the existing rights of way. These existing rights of way are a long established and much loved and much used amenity by local members of the community for walking on a daily basis. They bring those members of the community who would have otherwise no interaction with the St. Ita’s complex into a close appreciation of the area through the use of these rights of ways for walking. I am concerned that if the existing public rights of way are formally extinguished by Fingal County Council - in accordance with Section 73 of the Roads Act 1993 – this will remove the legal right of the community to pedestrian access through the site. The applicant is not proposing to provide new legal pedestrian public rights of way. The community is being asked to accept a promise made in a planning application; a promise which has no legal basis. The planning application states that “alternative / replacement public access routes through the St. Ita’s Hospital complex will be open to the public prior to the closure of the sections of the existing public access routes through the St. Ita’s Hospital complex”. I find this very difficult to believe given how the site will be under construction that this will be complied with as it will not be a priority of the NFMH Development Team. I would request that the applicant is conditioned to formally create new legally binding rights of way which the community have a right to as opposed to an inference that they will be provided as part of the planning application which is not legally enforceable, which could ultimately lead to this right being taken away from the community easily enough if the applicant were to take that action at a later date.

5. Woodland & Biodiversity Management (including invasive species control) for St. Ita’s Demesne: These proposals set down in a planning application which contains so many impacts on the community, cannot reasonably be seen as a community gain.

6. Conservation of existing St. Ita’s hospital: Again this proposal set down in a planning application which contains so many impacts on the Community, Cannot reasonably be seen as Community Gain.

**Realistic Community Gain**

I have attended and held many meetings to ask the community what community gains a project such as the proposed St. Ita’s could deliver to them by way of a community dividend. The following suggestions were made. I would have trust that An Bord Pleanála and Fingal County Council will apply and suggest appropriate conditions, in the event of a grant of planning permission, in respect of same of the following.

**A list of Sports Clubs, Arts, Cultural and Heritage**

1. **St Pat’s GAA -Traffic and Car Parking percentage of the Community Gain**

I note from the proposed application that St Pats GAA were not consulted on the proposed development this gives me cause for great concern due to a number of reasons firstly St Pats are one of the largest Sporting Associations on the Peninsula they currently have just under 900 members approx. The Club have a long tradition with the St. Ita’s campus as originally their grounds were set within the campus. After many years on the campus the club were given the opportunity to move their grounds to Ballymastone. This ensured further development of the Club and facilities such as a clubhouse. The club access will be shared with large volumes of traffic that will enter and exit the same route the club use to access their facilities for the construction of the Hospital. The Club is utilised by all four local schools and also its members. It is worth noting on any given school day the Club could have up to three hundred children both cycling and walking up the proposed construction route for afterschool leagues and training within the Schools programme. The entrance is already extremely dangerous and narrow as it stands and the club have little parking spaces which they share with St. Ita’s AFC. Presently there is grave concern that an accident will happen and the added volume of traffic will increase the likely hood of this. The Club employ three staff members through various government schemes and they help to maintain the pitches within the Club.

1. **St Ita’s AFC – Lease to be resolved, Traffic and Car parking , percentage of the overall Community Gain**

St. Ita's AFC has had a long and distinguished association with St. Ita's Hospital, from which the Club derives its name, and the peninsular parish of Portrane/Donabate. The Club can trace its roots to the mid 1920's some two decades after the opening of the Hospital in 1901. In the early years and indeed up until the early 1990’s, membership of the club was primarily, if not entirely, made up from staff of St. Ita's Hospital which could at one time boast of its own Football, Gaelic, Hockey, Bowling and Cricket Clubs.” The Club is located at the same site adjacent to St Patricks GAA Club as well as the St.Ita’s Hospital Traditional Sports Grounds

1. **Portrane Hockey Club- Percentage of the overall Community gain full completion of the proposed All-weather pitch at Ballisk Donabate.**

Portrane Hockey Club was founded in 1909 through the hospital staff so to this day a permanent link has been with St.Ita’s Hospital. The Club today is served by Great, Great Grandchildren of founding Members. The Club was fully based in St. Ita’s from 1909 until 1996.

The Compulsory requirement that all hockey be played on Artificial Pitches and the winding down of St.Ita’s Hospital and there grounds resulted in the Club Playing there matches at Dublin Airport from 1996 This continue to play at Dublin Airport as they finalise efforts to return to Donabate/Portrane. Portrane Hockey Club provide hockey to its members from age five to Adult and to this day have an inextricable link to St.Ita’s Hospital.

1. **Lambay Sports Academy- site for Lambay Sports Academy athletics club to train/store equipment and Percentage of the Overall Community Gain**

Currently the Club have over 200 members and are without any facilities to train their members. The Members of LSA age bracket is from 7 to Adults, currently the Club on any given training night could have up to 80 Children running on the roads. This is not an ideal situation from a health and safety risk and monitoring of children on the runs. The club formed in 2011 and has grown steadily each year. This club is run entirely by Volunteers and they are a member of the National Athletics Ireland. Presently the Club have a long waiting list of children wishing to attend due to lack of training facilities the Club are not in a position to accommodate these children. This Club is the only Voluntary sporting club within the Community that caters for individuals who would not normally participate in team Sport. The Club have a holistic approach and promote the long term development of their young Athletics. Given the long sporting history on the St. Ita’s campus and indeed some pre-existing Athletics facilities this campus would an ideal location for an athletics club which can be used jointly by the Club itself and Staff of the Hospital and Grounds promoting a community atmosphere within the campus.

**5. Portrane Athletic Club- Resolved Lease agreement and Percentage of all over Community Gain.**

Started in 1950s and reconstituted in 1993. Portrane Athletic has held unbroken membership of the Amateur Football League in Dublin during that time. The Club have seven adult and under age teams offering football from the age under 10 to over 35s and have been growing rapidly in recent years. The Club have had only had one underage side three years ago, now they have four. The Club are expecting to facilitate ladies football next season, and add more under age sides. The Club have occupied the current site since 1996, and have invested €200,000 in converting it from marshland to become one of the best pitches in North Dublin. The Club have informed me when visiting teams and officials visit they agree that playing surfaces are League of Ireland standard. The Club have developed the facilities entirely through local fundraising, chiefly a weekly lottery, without any grant aid as we already discussed they could not apply for outside support due to withholding of long term tenure by HSE. The Club have two young unemployed club members visiting local schools to promote sport and association football. Local schools have also been facilitated to use our pitches when needed.

1. **Donabate Tennis Club**

Within the Community currently a group of Volunteers have come together and formed a steering committee in order to achieve the goal of a Tennis Club within the area. This club is presently at development stage.

1. **Donabate Swimming pool initiative Would request some share if percentage of overall project is to be disbursed for feasibility and/or facilities of the swimming pool**

Local Community Group with goal of providing a swimming pool serving the local schools and Community within the Peninsula of Donabate & Portrane

1. **Donabate Dramatic Society Cultural: Storage Container & Facilities for the Cultural Arts.**

Donabate Dramatic Society was founded in 1936 by the late Fr. J. Moynihan and is one of the oldest dramatic societies in Ireland. They are based in the Donabate and Portrane Peninsula. The President of the DDS is Ms Liz Walsh who is a retired nurse of St.Ita’s Hospital. The first play staged was "Don't dress for Dinner" and was produced by Fr. Moynihan. The cast were as follows: Margaret Lynders, Nora Gavin, Gerry Griffen, Aidan Branagan, Paddy Laffoy, Joe Laffoy, Mel Byrne, Martin Ryan, John Eiffe who all had strong connections with St.Ita’s Hospital. At a meeting in Saint Patrick's Hall in January 1937 it was decided that the new name of the society would be "The Donabate Dramatic and Choral Society". This society has flourished in the parish since then. Meetings were held weekly up to 1944 when interest waned somewhat. It has been revitalised since then and is now currently better than ever. In 1942 the Parish Council organised a Drama Festival. The Irish Times printed a pictorial review, which is still a keepsake in many houses locally.

**9. Contribution towards youth facilities (Skate Park, playgrounds, etc.)**

Commitment for a fixed percentage of employment opportunities for local residents in both the construction phase and the operational phase once the facility is commissioned. Proposals for enforcing this requirement to be provided.

## **Summary of Community gain**

I note a previous study on a draft proposal for the future of St. Ita’s hospital was commissioned in June 1998 where it states a study was undertaken by UCD on proposals for future use this study concluded with a number options of which I have outlined below:

The study looks at three possible options for the Donabate / Portrane area. Each Option includes a future use for St. Ita's. In Option 1 "it is envisaged that the complex will serve as a centre for the educational and community facilities.... (to) include extensive second level provision facilities for evening courses and open university .... use of the existing sports facilities .... local clubs, society meetings and cultural events”. Option 2 proposes that St. Ita's be converted into a sports centre "to provide sports halls, squash courts, meeting / lecture halls and residential accommodation for organised courses .... (reuse of) the existing playing pitches and provision of a swimming pool and a floodlit all - weather pitch". Option 3 suggests that most of the site be given over "to non- medical uses but some provision will be made to cater for medical needs in the form of sheltered housing and community based care". This option also includes the following proposals. 'To make provision on part of the site for the concentration of caravan, camping and related facilities which are at present.

This study forms the argument I am trying to make with regards to the Community Gain within the proposed development on St. Ita’s Campus.

The St Ita’s Campus provided the best part of all sporting cultural and Community Facilities for the community. For this reason it is it important that the Community see a real sense of Community gain from this proposed development as the Community will suffer through the Construction phase on the Development.

An Bord Pleaneala makes a financial contribution/levy for community set at a reasonable figure of 4-5% of the overall project cost on the basis that, this would not be onerous on the overall project budget, it is a right as set out under the act and it is the right thing to do by the community to help pave the way and welcome the new NFMH community into the community of Portrane Donabate development.

# 3. Operations of the New Hospital / Plans for the old Hospital

The concerns of isolation on the Peninsula with regard minimal Gardaí presence and security within the area is of serious concern to the community within Donabate & Portrane. I have great concerns that the Lack of a Gardaí Station on the Peninsula with the development of the National Forensic Hospital. This in my opinion is a risk of security to all on the Peninsula particularly with Patients travelling to and from the Hospital. Indeed for the Patients of the New Hospital it is equally important for them to recover within a secure and safe environment.

While I accept a provision of a Gardaí station is not the remit of the applicant at the very least there must be a strong policy direction around security involving the Gardaí, HSE, Fingal County Council and the local community. A comprehensive state of the art CCTV system which captures all of our peninsula including both St. Ita’s and the proposed National Forensic Hospital and is connected to An Garda Siochana is a minimum requirement in advance of the facility opening. There must be a strong policy direction towards a significant improvement on a visible Garda presence around our Peninsula. It is right to expect that a facility of this National Importance will see close collaboration between the Department of Health, Department of Justice and Fingal County Council.

**Transport Systems**

The current Public Transport system within the Donabate & Portrane peninsula is barely adequate to meet the needs of an expanding community and now the proposed National Forensic Hospital. While Trains into the City are adequate at peak times there are significant gaps at all other times and particularly at weekends. There needs to be early and forward planning to address the increased needs this welcome new hospital will bring. Early planning and consultation between the applicant, FCC , Irish Rail and Dublin Bus must be carried out. The Initial plan to extend the Dart Service from Malahide to Donabate before 2015 is now of even greater importance.

I would request that An Bord Pleanála seek a proper Pedestrian/Cycleway Corridor between the New Hospital /Donabate Train Station and joining Newbridge Demense this needs to be considered in Consultation with FCC. This Corridor would need to serve all areas of the community given the significant amount of Community Services we have on our Peninsula to meet the needs of various Organisations who are supporting residents in our Community with Physical Disabilities for example the National Association for visually impaired. Given the poor connectivity between Dublin Bus and Irish rail a regular bus service to supplement Dublin Bus between Donabate and Portrane must also be considered.

**Local Mental Health Services**

The welcome addition of the new National Forensic Hospital must also be complimented by a dynamic and modern Comprehensive Mental Health Service as outlined in the current Government policy document “Vision for change”. The Coming together of the National Forensic Hospital, St. Ita’s Mental Health Services and St Joseph’s intellectual disability services should see all three reach for the highest standards in Health Care provision.

**Local Employment**

As the opportunity presents itself with the proposed development of the National Forensic Hospital. I would request that at least ten percent of the construction employees including subcontractors are from the Local population. This would be of great benefit within the local community which has a wealth of skill within it’s young population.

**The Old Buildings**

The variation addresses the National Forensic Hospital, but makes very little reference to the existing buildings in St Ita’s Portrane and their future use. Both the New National Forensic Hospital and the current St. Ita’s Campus are both intertwined and interlinked. The Applicants approach to the Old Buildings in “mothballing” is not good practice for protected buildings while the proposal for the National Forensic Hospital is strong and well thought out, the plans for the regeneration of the existing St. Ita’s Campus is very weak. There needs to be a measureable and sustainable Plan for the regeneration of the old structures at St.Ita’s as part of this permission. The proposal in my opinion is weak and needs to be further worked on within the iterative process in accordance with the proper planning and sustainable development of St. Ita’s.

The forthcoming Finance Act provides for taxation measures for brownfield sites and furthermore this is now being transposed into the actual planning act with a specific planning head dealing with the encouragement and reuse of brownfield sites such as St.Ita’s.

# 4. Forestry and Drainage

I acknowledge that it is normal and standard practice during Construction projects that trees must be felled and I also recognize this. However notwithstanding this, I would ask An Bord Pleanála to request the applicant come back with a revised proposal around the felling of the number of proposed trees, which is currently in the region of just under 900 trees, a large number of which are over a hundred years old.

I would urge An Bord Pleanála to condition instructions around the felling of trees so that the HSE should as a minimum carry out the following mitigation measures to against the felling of so many trees

1. Force the applicant to reroute the proposed security boundary fence around the National Forensic Hospital by a distance to allow the trees to stay in place which would as a result negate the need to fell the majority of these trees. The Applicant has not demonstrated the absolute need for the security fence in its chosen location. The redesign of the location of the security boundary fence with the specific design intent of minimizing the felling of trees would not seriously injure the proposed design, while saving a large proportion of the trees. I would contend that with imaginative and considerate design of the location of the fence in relation to the trees around the site we feel that a large number of trees could be saved.
2. Force the applicant to employ an independent arborist to supervise the felling of all trees so that they are felled correctly, without any encroachment and felling of any unnecessary additional trees during the construction of the project, which often times happens and that the proposed replanting is supervised by the same arborist to insure that they take place.
3. Force the applicant to make these felled trees available to the community of Portrane/Donabate as a part of the community gain that is due to the community for this project, specifically for the loss of this amenity. If the HSE is to demonstrate its ‘gain’ elements to the community, what better way than by giving back to the community what has always been theirs, by way of a social dividend.

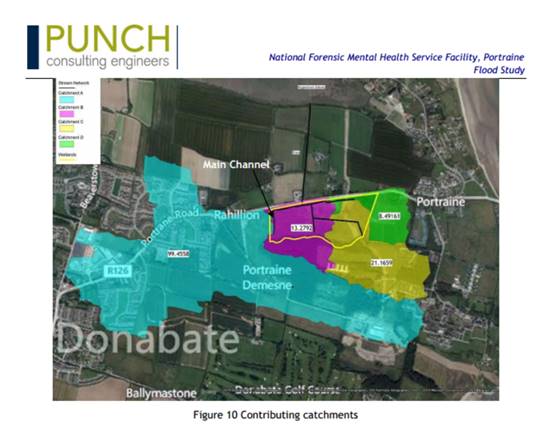
The conditioning of these requests by An Bord Pleanála on the Applicant, would improve the design, because less trees to be felled and make the development more sustainable and more welcoming and ultimately more successful.

I would also like to note with regards to drainage the felling of to many trees will seriously affect the drainage and surface water run off within the local area which is already at crisis point. An Bord Pleanála can alleviate this potential hazard by instructing the applicant to protect and manage these trees better within the proposal as presented.

It should also be noted that development as proposed includes in Summary [[1]](https://dub126.mail.live.com/ol/" \l "_ftn1" \o ") some 8,000.sq.m of demolition and some 25,000.sq.m of new build. However, in my considered opinion what is obvious within the application is that this is not fully assessed within the submitted EIS, inter alia, the fact that overall site subject to this application involves full re-grading of the entire site (some 8 hectares) of 2m below existing levels which involves serious cut and backfill including the removal of 1.2ha of woodland totalling some 980 trees

I am of the considered opinion on reading the applicant’s EIS, the submitted potential Flood Risk Assessment that this development as a result of the serious invasive work that will occur, will impact on the overall drainage of the area to the detriment of the usability of our community sporting clubs and residents.

The site is located less than 450m from the subject site of the Sports clubs with regards to playing pitches.



The Flood Risk Assessment carried out by Punch Consulting does not allude to the large amount of re-grading, earth removal and tree removal within its assessment. The SUDS strategy for such a large development relies in some parts to “permeable paving”. It also states that it will increase wetness into the “dry” wetlands area located to the front of the site abutting the Portrane Road. On a recent walk about of the Sports clubs grounds, it can be stated for the record that this area was in fact flooded. An inspection also occurred of both St. Ita’s AFC and St Pat’s GAA pitches and I can confirm that both Clubs pitches were also covered in surface water. As a member of St. Pats GAA I can inform you that the pitches were ‘out of action’ until further notice and all training had ceased for last week and the week commencing the 17th of November.

Furthermore, the lands of both St. Ita’s AFC and St. Pats GAA fall within the actual Catchment Area of the Surface Water – Catchment Area A. This is demonstrated in Figure 10 of submitted Flood Study.

# The Residents of Portrane Avenue

To give you the history of the Avenue all of the residents are either staff of the hospital or retired members of staff. Most residents currently living in these houses have resided on the avenue for many years. Ranging from 45 years occupancy to 20 years occupancy.

The Residents of the Avenue are very disappointed that no consultation between the applicant and the residents took place prior to the planning application being submitted to An Bord Pleanála.

1. It is my belief that there should be a separate entrance to the National Forensic Hospital not through the Current Portrane Avenue considering that some of the residents have lived on the Avenue for more than 40 years. In the most recent development on the St. Ita’s Campus a haul road was constructed for the Knockamann Development and the residents feel strongly that this should be reinstated as the main entrance or an alternative route for the National Forensic Hospital.
2. The Current Proposal is to build a generic Car park before you come to the houses on the Avenue. This in my opinion is not respectful of the residents who will have to park far from their homes and make simple daily tasks like bringing shopping in cumbersome. They will also have the risk of serious Anti-social behaviour as is it not in view of the Residents homes. This in my opinion is not acceptable and the Bord should seek for the restoration of the pre-existing back roads and lanes.
3. In my opinion speed ramps along the Portrane Avenue is crucial to this development in its current form. As the residents have expressed concerns with regards to speeding on the

Avenue.

1. Currently there is a number of houses boarded up on the Avenue. Given the current housing crisis these houses should be fully restored and put back in use as at the moment they are a serious fire hazard.
2. Historically the Houses of Portrane Avenue were served by side lanes and roads at the back of their houses which allowed for the easy movement of cars and parking. These services should be reinstated as they were allowed to deteriorate as the Hospital went into wind down. Now that the Campus is to be regenerated essential works & maintenance of the HSE houses on Portrane Avenue needs to be carried out as a matter of urgency.
3. The recent installation of the Security Barrier on the Portrane Avenue is causing stress to the residents living on the Avenue as this barrier is now causing traffic issues on the Avenue that were not previously there.

# 6. The Local National Schools

I would like to note that both St Patrick’s National Boys School and St Patrick’s National Girls School have serious concerns with the issue of Traffic presently and within the Planning application presented to An Bord Pleanála. I would also like to note that the Applicant made no efforts to consult with either School prior to submitting the planning application. Both schools are located together and in very close proximity to the proposed construction entrance it is also worth noting with regards to parking neither School have availability within the vicinity of the schools for parking. The Board of the Management of both Schools are very concerned that the Construction traffic travelling to the Site which will have a major impact on the Schools who already cannot encourage Pupils to cycle or walk to school presently due to the dangers of traffic within the Area. This is extremely frustrating for the schools as presently both Schools need Staff on the roads directing the Pupils to the School safely in the mornings. The Schools have spent many years lobbying FCC for a gate to the rear of the School so children can enter the school in a safer environment. In my opinion Construction Traffic using the same route as the Schools will present serious danger to the Vulnerable Road Users of both Schools even if a curfew on times of traffic is in place. In the past twelve months there has been a Traffic incident regarding a pupil within St Patrick’s National Boys schools.

The only plausible conclusion that can be drawn in relation to the safe management of the traffic around the schools is that mentioned in item number 1 above, that being the rerouting of the construction traffic away from the village and schools via the proposed alternative route using a temporary haul road.

Donabate Portrane Educate Together School currently are very pro-active in promoting age appropriate education in Positive Mental Health. The School believe that this development will bring some of the country’s most experienced and qualified mental health practitioners into our community and they would like to see links made between these experts and the groups working with young people in our community (schools, sports clubs etc.)

Donabate Portrane Educate Together School whilst in support of the application they would hope to see good planning & management of the increased traffic in the area during the construction phase and beyond. They explained in detail that the nature of our peninsula means we have only one route to the hospital grounds which takes traffic through our village and past all four local schools. This could be especially problematic in the mornings

between 8am and 9am, and at home time between 2:15 and 3:30. They would be very concerned of our vulnerable road users.

# 7. Concerns for St. Ita’s Walled Gardens

The walled gardens at St. Ita’s Portrane were constructed in the 1730’s by The Evans Family as part of Portrane House (now demolished), which was the original Portrane Demense which was subsequently bought for the building of an auxiliary hospital to the Richmond Hospital, which was completed in 1902, now known as St. Ita’s Hospital. The walled gardens at St. Ita’s Portrane were constructed in the 1730’s by The Evans Family as part of Portrane House (now demolished), which was the original Portrane Demense which was subsequently bought for the building of an auxiliary hospital to the Richmond Hospital, which was completed in 1902, now known as St. Ita’s Hospital. These gardens are the oldest structure on the whole site and although they have no architectural merit, historically, culturally and for heritage reasons they are a link going back over 350 years to the original Evans House and way of life.

Before the announcement of the relocation of the NFMH to the St. Ita’s site, initial discussions between the Local Community Group Transition Towns Donabate Portrane with the HSE were positive around making available these lands to the community as community garden.

Just to give you the background on the situation. The Local Community Group Transition Towns Donabate Portrane had met with Fingal County Council and has the full backing of the council in this regard, with motions passed by Fingal County Council at chamber level calling upon the HSE to enter into negotiations with the Local Community Group Transition Towns Donabate Portrane to bring the walled gardens at St. Ita’s back into community use, motions which I fully support.

In Sept 2012, the HSE wrote to the Local Community Group Transition Towns Donabate Portrane indicating that it had the intention of incorporating the walled gardens into its proposal for the new National Forensic Mental Hospital and that there was ‘knot weed’ present and therefore as Community Group Transition Towns Donabate Portrane could not afford to eradicate this weed and that the HSE had plans for the walled gardens, the HSE made it clear at this stage to the Local Community Group Transition Towns Donabate Portrane that they had no hope of creating a community resource at this location as the HSE wanted to do this in the new development of the National Forensic Hospital.

The proposed new development as it stands in this planning application omits the walled gardens from its current plans contrary to the correspondence previously made to the Local Community Group Transition Towns Donabate Portrane. The applicant makes vague aspirations for the walled gardens at some later date, within its reports within the EIS and Planning Statement, aspirations that I suggest are just that. Not concrete, vague and ultimately undeliverable, as ultimately the HSE is a health care provider and not the proper guardian of sites of such valuable cultural and heritage value.

I would urge the Bord to condition the applicant in this instance, that the HSE should make these lands at the walled gardens, St. Ita available to the whole community through the Local Community Group Transition Towns Donabate Portrane, to create a shared space for the local community and the new community of the Forensic Mental Hospital when it arrives. Thus creating a readymade location for the future therapeutic community reintegration of the clients of the Forensic Mental Hospital back into the real community in a real and inclusive manner.

# Summary

I would like to thank the Board for allowing the community of Donabate & Portrane to raise all concerns in support of this application. It is my considered opinion that the points I have identified within this submission must be considered and conditioned as part of the grant of planning permission.

1. Community Gain is inefficient for the Community considering the significant impact this proposed development will bring to Donabate & Portrane. The proposed Community gain is an insult to the Community presently I would like to request that An Bord Pleanála recommends a financial contribution/levy as a social dividend for community set at a reasonable figure of 4-5% of the overall project cost on the basis that, this would not be onerous on the overall project budget, it is a right as set out under the act and it is the right thing to do by the community to help pave the way and welcome the new NFMH community into the community of Portrane Donabate. The local community of Donabate/Portrane and St.Ita’s Hospital enjoy a unique and strong bond, long established and this needs to be properly recognised through a significant Social dividend.
2. Re-route the Construction traffic away from the Village, Schools, and local Graveyard via a Temporary Haul Road across Fingal Co Co.
3. Regularise the legal position guaranteeing any rerouted rights of way through the St.Ita’s complex prior to any work to these existing rights of way.
4. Re-design the location of the perimeter fencing to minimize the felling of trees and give to the Community of Portrane & Donabate the Trees that cannot be saved as a part of the Community Gain.
5. Addressing the issues of the Residents of Portrane Avenue particularly with the change of the proposed Car Park to alternative location.
6. Operations within the development to prioritise Security, Local, Policing, Transport and to ensure the provision of local Mental Health Services reach the standards as set out in Government Policy “Vision for Change”
7. Current St.Ita’s Campus. This application makes very little reference to the existing buildings and Future plans. The applicants plans for both the new National Forensic Hospital and the current Victorian buildings needs to be clearly set out within this application.
8. Forestry and Drainage. I would request the board cap the tree felling to a minimum.
9. WithiMinimum of ten percent of the staff employed for construction is from the Local Area