



AN BORD PLEANALA  
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**PASCHAL DONOHOE TD**

Dublin Central Constituency

Constituency Office:

6A Phibsborough Plaza,  
 Phibsborough, Dublin 7.

Tel: 01 618 3689

E Mail: paschal.donohoe@oir.ie

Web: www.paschal-donohoe.ie

The Secretary  
 An Bord Pleanala,  
 64 Marlborough Street,  
 Dublin 1.

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 TIME 4:50 BY Hand  
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14<sup>th</sup> September 2011.

Dear Sir / Madam,

**RE: Proposed development of a new children's hospital at Eccles Street, Dublin 7 on a development site known as the Mater Misericordiae University Hospital Campus**

Please find attached submission from Paschal Donohoe TD and Councillor Ray McAdam to the construction of a National Children's Hospital on the Mater Hospital site and the specific impact of this project on the districts of Phibsborough and Mountjoy.

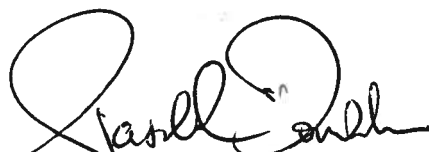
In lodging this submission we want to highlight our support for the Government's decision to proceed with the Mater site as the best location for a new National Children's Hospital. This decision has been supported by the work of the Independent Review Group led by Chief Executive Officers and Clinical Directors from four of the world's leading Paediatric Hospitals. It is further supported by the work undertaken by a leading global expert in Medical Infrastructure development as part of that Independent Review.

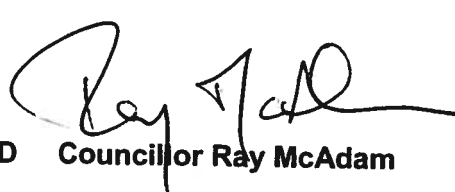
Whilst we fully support the decision to locate the Children's Hospital on the Mater Site, we have submitted a number of recommendations which we request An Bord Pleanala examine and consider so that the least impact possible will be felt by the communities living in the immediate vicinity of the proposed development.

We request that An Bord Pleanala hold an Oral Hearing into this application and that we have an opportunity to participate in such a process.

We look forward to engaging with you as the planning process continues.

Regards

  
 Paschal Donohoe TD

  
 Councillor Ray McAdam

## 1. THE NEED FOR AN ORAL HEARING INTO THIS PROJECT

As this application is being considered as of strategic importance in accordance with the Planning and Development Acts 2000 – 2010, the communities we represent have only had eight weeks to consider the detailed documentation lodged with An Bord Pleanala. We would contest that the timeframe from when the documents were submitted to the Board, to them becoming available and the subsequent deadline for receipt of submissions is insufficient for detailed consideration of all the various issues of concern to residents. Given the scale and size of the project, there will likely be a substantial impact upon the local community; we believe it is only through the holding of an Oral Hearing that these matters and other potential difficulties will be resolved.

### RECOMMENDATIONS:

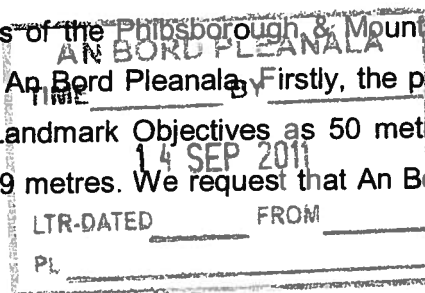
- That in the event of an Oral Hearing being held into this project, resources and/ or professional services should be made available to assist local community groups in their submissions to the oral hearing.

## 2. CONFORMITY OF THIS PLANNING APPLICATION WITH THE DUBLIN CITY DEVELOPMENT PLAN 2011 – 2017 & PHIBSBOROUGH & MOUNTJOY LOCAL AREA PLAN

Although this application for planning permission is being sought through the Strategic Infrastructure route, it is important that it conforms to the aims and objectives of the Dublin City Development Plan 2011 – 2017 and the Phibsborough & Mountjoy Local Area Plan. Local residents over the past number of years have been actively involved in the formation of both these plans and although provision was made for this facility, there has been understandable concern about the height and density of what is proposed in such a built up area.

Dublin City Council has confirmed that the application now before An Bord Pleanala is supported by the National Development Plan 2007 – 2013, the Core Strategy of the Dublin City Development Plan 2011 – 2017 and a number of provisions and objectives of the Phibsborough & Mountjoy Local Area Plan. The Local Area Plan also set the Mater Hospital site as a Key Development Site in which “an appropriate quantum of floorspace....to facilitate....a world class medical institution and the delivery of a paediatric facility of national and international significance” could be provided.

There are a number of issues surrounding objectives and aims of the Phibsborough & Mountjoy Local Area Plan that we believe require further examination by An Bord Pleanala. Firstly, the plan contains a maximum permitted height as set out in the Key Landmark Objectives as 50 metres whereas the highest point of the proposed development is 94.49 metres. We request that An Bord



Pleanala examine the potential impact of a building of this height on the local area with particular regards the obstruction of sunlight, the creation of possible wind tunnels and whether it negatively impacts upon the sustainable conservation of protected structures locally. These are all factors contained in the Local Area Plan that the development must take cognisance off.

**RECOMMENDATIONS:**

- **That An Bord Pleanala request further information from the applicant in respect of the high-rise design of the building on the immediate vicinity of the Mater campus. Photomontages and 3D models should be provided so that the full impact of the design can be further examined.**
- **That the Georgian heritage of the area be respected, preserved and enhanced by the development.**
- **We support the recommendation submitted by Dublin City Council with respect of a further assessment of the potential for wind tunnels to be a consequence of the height of the building and what impact that may have on the area in the immediate vicinity of the development.**

**3. EFFECTIVE TRAFFIC MANAGEMENT REQUIRED**

The construction and operation of the new National Children's Hospital will lead to increased levels of traffic in the vicinity of the Eccles Street, Berkeley Road, North Circular Road and the wider Phibsborough district. Although a traffic impact assessment examined how much traffic will be generated by the provision of the National Children's Hospital in the area, insufficient information was provided about the potential impact of construction traffic. Residents are concerned about how construction vehicles and associated traffic will effectively be managed to prevent further traffic gridlock locally. How will such movement work and what priority will be afforded to the movement of local vehicles? No information was provided regarding the level of on-site parking for construction traffic. Parking is already at a premium on a variety of streets in the immediate area of the Mater campus. Local residents are fearful that their on-street parking will no longer be available to them due to the inevitable influx of privately owned vehicles of construction workers. Whilst Dublin City Council in its' report to the Board has suggested that a construction traffic management plan be agreed in advance of the construction phase, we would further suggest that 'Scheme Traffic Management Plans' for each individual phase of the construction process be developed in consultation with key stakeholders.

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Further consideration is required to deal with increased levels of traffic during morning and afternoon peak hours. North Circular Road, Berkeley Road, Eccles Street and Phibsborough Road are regularly backed up by traffic at these times and we believe it is necessary that more effective traffic management plans be drawn up in consultation with Dublin City Council to address this issue. There is also insufficient information in the EIS about the proposed link road between Eccles Street and the new vehicular entrance on North Circular Road.

**RECOMMENDATIONS:**

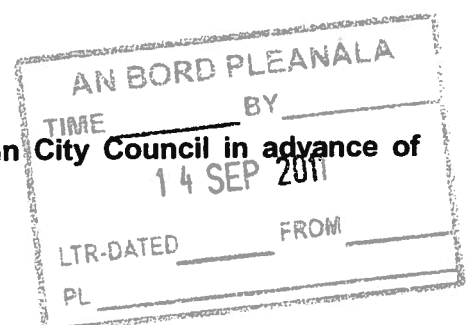
- **A project traffic management plan for all stages of construction traffic is agreed with Dublin City Council in advance of construction beginning on the development. This traffic management plan should also contain separate parking provisions for construction workers throughout the construction phase.**
- **A Mobility Management Plan is drawn up and agreed with Dublin City Council Traffic Department in advance of any construction works beginning.**
- **With regard to the proposed traffic alterations on Eccles Street, we suggest that traffic lights be installed at the western end of Eccles Street and that a pedestrian crossing be put in place at the junction of Nelson Street.**
- **We share the view of Dublin City Council that the proposed works to Eccles Street be completed prior to the opening of the National Children’s Hospital and the associated car park.**

**4. DETAILED DRAINAGE PLAN NECESSARY**

Residents are concerned about the impact that this development will have on the existing drainage network in the immediate vicinity of the Mater site. The local drainage network is facing capacity constraints and it is necessary that the applicant address what assessment it has undertaken in drafting its drainage plans and what level of consultation has been undertaken to date with the Drainage Division of Dublin City Council? Has the applicant examined what impact the excavation works may have upon the water surface levels on the site and subsequently for neighbouring areas? We welcome Dublin City Council’s request that a flood risk impact assessment be completed and that the results of such documentation be provided to the local authority in advance of any construction work taking place.

**RECOMMENDATIONS:**

- **That a drainage plan be prepared and submitted to Dublin City Council in advance of construction beginning on site.**



- That a flood risk assessment be undertaken and that all steps necessary are completed to minimise the potential for flooding.
- That a comprehensive surface water management plan be carried out given the scale of the proposed development.
- Part of the development levy is ring-fenced and used for the upgrade of the local drainage network.

**5. CONSTRUCTION MONITORING COMMITTEE NEEDED TO DEAL WITH MITIGATION MEASURES**

A number of areas which will require mitigation measures have not been dealt with adequately by the EIS. The security of residents, especially the elderly in the area will be compromised as vibrations produced by demolition and deep excavation works are likely to set off care and property alarms. No evaluation of what steps can be taken to reduce this interference was made in the EIS. Changes in the quality of local air also needs to be assessed. Residents within a 150 metre boundary face a range of increased costs as the dust produced will necessitate increased window, road and gully cleaning and residents will not be able to hang their washing outside to dry. As a result of this, we believe the question of mitigation measures with respect of air quality requires further consideration. It is also essential that the contractors employed on behalf of the applicant minimise the level of noise throughout the construction process. We would ask that the noise control scheme be put in place following consultation and agreement of Dublin City Council particularly for the construction phase of the project. The noise control scheme should include a maximum acceptable level of noise and that baseline measurement should account for the fact that the development is in a residential area. We would ask the Board to examine whether mitigation measures are necessary to deal with the impact of glare caused by the amount of glazing to be used in the development.

**RECOMMENDATIONS:**

- That a Monitoring Committee comprising of Dublin City Council officials, representatives of the applicant, City Councillors and local residents be established for the duration of the construction phase. This monitoring committee should provide an opportunity for issues that may arise throughout the construction phase to be resolved directly and as efficiently as possible.
- Further information is provided in respect of the assessment undertaken to measure the amount of solar glare from the development on the local area.

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- That an effective noise control scheme be developed in consultation with key stakeholders and that it be agreed with Dublin City Council in advance of construction works beginning.
- That an air quality assessment be completed and baseline figures agreed with Dublin City Council in advance of construction works beginning.

## 6. MISCELLENEOUS ISSUES

We would request that An Bord Pleanála direct as part of any approved planning permission that a **local employment clause be inserted so as to ensure that the development of this scale will also provide some employment gain for the local community.** We would request that the Board direct the applicant to engage with local community groups so as to agree a comprehensive community or planning gain programme as recommended by Dublin City Councillors which forms part of the Dublin City Council report into this application numbered 245/2011.

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<sup>1</sup> Dublin City Council Report No. 245/2011, P.34

