

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

December 2020  
[By Hand]

Dear Sir,

**RE: Environmental Impact Assessment Report (EIAR) Screening – Proposed Residential Development at Former St. Kevin’s Hospital and grounds, Shanakiel, Cork**

## **1.0 INTRODUCTION**

This Environmental Impact Assessment Report (EIAR) Screening is submitted by Tom Phillips + Associates (TPA), Town Planning Consultants on behalf of our Client, the Land Development Agency, in respect of the proposed residential development of lands at the above location. In summary, the Land Development Agency intend to apply to An Bord Pleanála (the Board) for permission for a Strategic Housing Development with a total application site area of c. 5.7 ha, on lands located at the Former St. Kevin’s Hospital and Grounds, Shanakiel, Cork (A Protected Structure, ‘Our Lady’s Hospital’ RPS Ref. PS620). The development, with a total gross floor area of c 24,344 sq m, will provide 266 no. residential units, a crèche and office enterprise centre. The development will consist of 46 no. town houses (32 no. 3 bedroom units and 14 no. 4 bedroom units) arranged in 11 no. two storey blocks; 54 no. ground floor 2 bedroom duplex apartments and 36 no. 3 bedroom and 18 no. 4 bedroom duplex townhouses above arranged in 7 no. three storey blocks and 52 no. walk-up apartments (11 no. 1 bedroom apartments and 41 no. 2 bedroom apartments) arranged in 3 no. four storey blocks. The development will also include the stabilisation, conversion, renovation and internal reordering (including new structural frame and floors) of the former St. Kevin’s Hospital building to provide 60 no. apartments (26 no. 1 bedroom and 34 no. 2 bedroom apartments) a 440 sq m crèche at ground floor level, with ancillary outdoor play area and the conversion of the 630 sq m former chapel building to provide a new Office Enterprise Centre. The proposed development will include 241 no. surface car parking spaces and 563 no. bicycle parking spaces.

The development will also consist of the demolition of 2,901 sq m of former hospital buildings and associated outbuildings (including the demolition of the 1,129 sq m former two storey St. Dymphna’s Hospital block; 672 sqm of the rear toilet blocks and contemporary stair cores to the side and rear of the St. Kevin’s Hospital building; the 220 sq m two storey former Doctors House; the 50 sq m one storey hospital mortuary building; 480 sq m of shed buildings to the rear of the Chapel; the 151 m retaining wall to the immediate south of the St. Kevin’s Hospital building and the partial demolition of the existing 350 sq m link corridor structure, to be replaced with an integrated landscaped amenity area in the footprint of the original structure.) 2 no. new 228 sq m extensions with bridge access are to be provided to the rear of the St. Kevin’s Hospital Building and 2 no. 31 sq m new glazed porch extensions to the south.

TOWN PLANNING CONSULTANTS

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The development will also include the provision of a play area to the immediate east of St. Kevin's Hospital; private, communal and public open space (including all balconies and terraces at all levels); internal roads and pathways; pedestrian access points; hard and soft landscaping; boundary treatments including the repair of some existing boundary walls; the provision of new surface water and foul drainage pipes and any associated pipe diversion works; new retaining walls; a new internal access road; changes in level; services provision and related pipework; electric vehicle charging points; attenuation tanks; SUDS; signage; the upgrading of the existing access from Beechtree Avenue; public lighting and all site development and excavation works above and below ground.

We note that the scheme includes a range of residential support amenities such as the proposed crèche and play facilities, along with woodland walks, open meadowed spaces, landscaped pedestrian zones, terraces and vantage points, which will positively contribute to the amenity of the development.

The purpose of this Report is to provide:

- An assessment of the proposed development in the context of the relevant thresholds for this form of development (residential), which require the preparation of a mandatory Environmental Impact Assessment Report (EIAR);
- An assessment of sub-threshold considerations for the proposed development, and;
- An outline of the scope and content of the proposed Planning Application including all relevant assessments, which we propose to submit in lieu of a formal EIAR regarding the proposed development.

This Report has had regard to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003. We have also considered the provisions of the *Environmental Impact Assessment of Projects (EIAR) Guidance on Screening* published by the European Union in 2017. The Screening Checklist included in that document is enclosed as Appendix A to this Report.

## 1.1 Summary

In summary, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIS (now EIAR) provision for this form of development, in our opinion, the subject proposal comprises a sub-threshold development.

Secondly, according to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development, August 2003*, a formal EIAR would not be required for this particular development. This is due, *inter alia*, to the development site area (c. 5.7 ha) and its locational characteristics, the proposed number of residential units (266 no.) and the fact that this proposal is unlikely to give rise to significant environmental effects.



Thirdly, while it is considered that a formal EIAR is not required in this instance, detailed and comprehensive assessments, as required, are enclosed with the planning application, which assess and address all of the relevant potential planning and environmental issues pertaining to the subject development. These assessments have informed development responses to the specific issues raised by development within the site. The assessments enclosed with the application are also designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.

## 2.0 STATUTORY INSTRUMENTS

### 2.1 *Schedule 5 of the Planning and Development Regulations 2001 as amended*

Part X of the *Planning and Development Act 2000* (as amended) provides a basis in primary legislation for EIA. Part X of the Act establishes a framework for EIA with the detail provided in Schedules 5, 6 and 7 of the *Planning and Development Regulations 2001* as amended (Regulations).

Schedule 5 of the Regulations sets out types of development for which mandatory EIA is required and is, therefore, an important reference point in the context of establishing the threshold for EIS preparation.

In terms of the different categories of development listed in Schedule 5 of the Regulations, the subject development relates to Part 2(10)(b)(i) and (iv) of the *Planning and Development Regulations 2001* as amended regarding 'Infrastructure Projects' respectively and provides the relevant area/development thresholds as follows:

*'Construction of more than 500 dwelling units'*

*'Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)'*

The proposed development in this case comprises 266 no. residential units, which is significantly below the above threshold. As such, it is considered that a mandatory EIAR is not required on the basis of number of dwelling units. This is further borne out by the EIAR Screening Checklist enclosed as Appendix A.

With regard to urban development and site area, the site is not located in an area that would be considered to comprise a 'business district' as per the above definition. The subject site is located in what would be considered an inner suburban residential area also characterised by a number of significant institutional (educational and religious) users. As such, the 2 ha site area threshold does not apply here.

The subject site area is c. 5.7 ha, which is very significantly below the 'other parts of a built-up area' threshold of 10 hectares. Thus, having regard to the above thresholds and the nature of the subject proposal, it is submitted that a mandatory EIAR is not required in respect of this development.



## 2.2 EIA Guidance for Consent Authorities regarding Sub-threshold Development

The issue that consequently arises is whether the proposed development, which is sub-threshold, still warrants EIAR. In this regard, we have assessed the proposal against the criteria as identified in the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003.

The primary aim of this document is:

*“To provide practical guidance for the competent/consent authorities in deciding whether or not a sub-threshold development is likely to have significant effects on the environment. The guidance should also assist developers and EIA practitioners in forming an opinion as to whether or not EIA would be appropriate to a specific sub-threshold development proposal”.*

The guidance also notes that:

*‘Irish EIA legislation mirrors the mandatory requirement in the Directive to carry out EIA in respect of certain project classes. In many cases, Ireland has adopted a substantially lower threshold than set in the Directive.’*

As illustrated above, the subject development is very substantially below the mandatory EIA thresholds identified in the Regulations.

Paragraph 3.4 further states:

*‘In light of the approach by Ireland (i) in setting mandatory thresholds for each of the Annex II project classes and (ii) in setting these thresholds at substantially lower levels than comparable Annex I thresholds in the Directive, the need for sub-threshold EIA should be fairly limited in Ireland’.*

We concur with this statement and consider that the current proposal similarly does not require the preparation of a formal sub-threshold EIS.

### Key Issues

The stated key issue for the competent/consent authorities in the context of the possible need for an EIA regarding sub-threshold developments is *‘whether or not such development is likely to have significant effects on the environment’*. The document, therefore, provides guidance to assist authorities in determining whether or not *“significant”* effects on the environment are likely in the context of sub-threshold development.

While the guidance acknowledges that *‘there are no hard and fast rules which can be applied’*, it sets out three criteria which competent/consent authorities must have regard to, in assessing whether or not the likely effects are *“significant”*.

The stated criteria for determining whether a development would or would not be likely to have significant effects on the environment are:



- Characteristics of the Proposed Development;
- Location of the Proposed Development, and;
- Characteristics of Potential Impacts.

The guidance also advises that particular attention should be paid to projects which are 'close to the national statutory thresholds', which is not the case here as illustrated above.

### **Characteristics of the Proposed Development**

The six sub-criteria which the guidelines identify as being important in terms of the characteristics of the proposed development are set out below. The relationship between the proposed development and each of these criteria is detailed below. (An amendment to the Regulations in 2008 referenced 'the nature of any associated demolition works' as being a relevant characteristic for assessment. On the basis that no significant demolition is proposed as part of this development, this is not considered a relevant assessment issue regarding the subject proposal.)

### **Size of the Proposed Development**

As previously outlined in Section 2.1, the subject development involves a site area of c. 5.7 ha and is situated in an area which would be classified as being "other parts of a built-up area". The appropriate threshold for development in such areas is 10 hectares. The subject development, therefore, involves an area which equates to just 57% of this threshold.

### **The Cumulation with other Proposed Development**

The guidance references the issue of cumulation with other projects. In this regard, the Masterplan submitted with the subject application outlines how the proposed development integrates and responds to adjoining development.

In terms of other permitted, but unbuilt, developments located outside the site but within its vicinity, the Applicant is cognisant of same and where there is a cumulative relationship between these developments and the subject proposal (e.g., sanitary services provision, water supply, cumulative traffic impact, etc), potential impacts are assessed in a cumulative manner.

### **The Use of Natural Resources**

The proposed development will not involve the use of natural resources; therefore, this is not a considered relevant consideration in terms of the subject proposal.



## The Production of Waste

The production of waste is not considered a primary characteristic of the proposed development. Waste Management is addressed as part of the planning application and will be integrated into the overall management regime for the development.

## Pollution and Nuisances

As with the production of waste, pollution and nuisances will not be primary characteristics of the proposed development. It is proposed that assessments of, *inter alia*, Conservation, Landscape, Visual Impact, Ecological and Traffic and Transportation Impact form part of the application.

## The Risk of Accidents, having regard to Substances or Technologies Used

It is proposed that the risk of accidents, having regard to substances or technologies used, will be extremely low in this case, given the nature of the proposed development.

## Location of the Proposed Development

In terms of the location of the proposed development, the guidance identifies three sub-criteria which should be considered in the context of the environmental sensitivity of geographical areas likely to be affected:

*“The existing land use;*

*The relative abundance, quality and regenerative capacity of natural resources in the area; The absorption capacity of the natural environment, paying particular attention to the following areas: Wetlands; coastal zones; mountain and forest areas; nature reserves and parks; areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC<sup>1</sup> and 92/43/EEC<sup>2</sup>; areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded; densely populated areas; and, landscapes of historical, cultural or archaeological significance.”*

The existing land use of the site is a vacant site, in former hospital use. In this regard, the proposed development of the site for residential purposes will accord with the existing long-established residential land use that characterises the wider area, which was previously confirmed as being acceptable in principle on the subject site by way of previous planning permission on the adjoining site to the west. Thus, it is not considered that the existing land use will be adversely affected in environmental terms by the proposed development.

The natural resources in the area of the subject lands will be unaffected by the proposed development.

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<sup>1</sup> Council Directive on the conservation of wild birds

<sup>2</sup> Council Directive on the conservation of natural habitats and of wild fauna and flora



The absorption capacity of the natural environment of the proposed development are addressed in the assessments enclosed with the planning application, but this is considered good in terms of existing infrastructure provision being available to serve the site. In visual terms, the proposed new build elements have been very carefully considered and sited by the scheme architects pursuant to a detailed architectural assessment of the existing built complex and review of potential impacts.

In addition, the subject proposal is sensitively designed to ensure it respects adjoining development and minimises significant visual impact. It is considered that there is adequate absorption capacity to accommodate the scale of the proposed development in this particular location.

Furthermore, the areas noted above as requiring '*particular attention*' in terms of sensitivity will not apply to the subject lands including:

- Wetlands (n/a);
- Coastal zones (n/a);
- Mountain and forest areas (n/a);
- Nature reserves and parks (n/a);
- Areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded (n/a) and;
- Densely populated areas (n/a).

The site does constitute "*Landscapes of historical, cultural or archaeological significance,*" however, a detailed *Conservation Assessment, Archaeological Impact Assessment* and *Landscape and Visual Impact Assessment* have been completed in respect of the impacts of the proposed development on the Protected Structure and in visual terms and are enclosed with the application.

### **Characteristics of Potential Impacts**

As previously outlined in above, there are no "*significant effects*" associated with the proposed development, primarily due to its characteristics (being significantly below all of the appropriate thresholds) and location (substantially within the existing built context of a well-established residential area).

Therefore, the issues which Schedule 7 lists as being important to have particular regard to, including, *inter alia*, '*the extent of the impact (geographical area and size of the affected population)*' and '*the transfrontier nature of the impact*' are not considered relevant in this context.



## Characteristics of Potential Impacts

Notwithstanding the above, detailed assessments accompany the planning application that provide a holistic and comprehensive analysis of the proposed development and an assessment of relevant potential planning and environmental impacts. Whilst not comprising an EIA in the formal legal sense, which we contend is not required in respect of this proposal, the enclosed documents provide the level of assessment required to an equivalent standard. A brief summary of the inputs included is set out below:

- *A description of the characteristics of the site location and description of development;*
- *An overview of the planning history of the lands and an examination of any issues arising;*
- *A detailed analysis of the relevant planning policy guidance at a strategic, regional and local level including Social Audit;*
- *A Site Masterplan and Design Rationale;*
- *An Architectural Heritage Impact Assessment which addresses, inter alia, the proposed development and the overall impact of the proposal;*
- *An Archaeological Assessment;*
- *A Landscape Rationale (including tree survey) and Masterplan;*
- *A Landscape and Visual Impact Assessment;*
- *A Daylight and Sunlight Assessment;*
- *An Ecological Impact Assessment, Breeding Bird Survey and Bat Survey;*
- *An Appropriate Assessment Screening Statement;*
- *A Flood Risk Assessment and Sanitary Services Report;*
- *A Traffic Impact Assessment including a DMURS statement, Mobility Management Plan and Car Parking assessment.*





### **3.0 CONCLUSION**

Collectively, it is envisaged that these assessments provide a holistic and comprehensive analysis of the proposed development and its planning and environmental implications.

We trust that this information fully addresses the issue of EIAR screening and that, in this particular case, an EIAR is not required in respect of this development.

Yours faithfully

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**John Gannon**  
**Director**  
**Tom Phillips + Associates**



## Appendix A EIAR Screening Checklist

Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the <b>Scoping Guidance</b>	Yes/ No/? Briefly describe	Is this likely to result in a significant impact? Yes/ No/?- Why?
Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes. The development will comprise the provision of a new residential development and additional population on a currently vacant, former hospital site. Thus, a new land use will be established on the site.	No. The adjoining area is characterised by significant residential development and zoning designation for the the site permits residential development in the statutory Development Plan for the area.
Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	No. Whilst zoned serviced urban land is a scarce resource in Cork, the proposed scheme will deliver a sustainable residential proposal that ensures the site will be efficiently used.	No.
Will the Project involve the use, storage, transport, handling or production of substances or material which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	No, other than the small amounts typically used in residential households.	No.
Will the Project produce solid wastes during construction or operation or decommissioning?	No. Whilst the development will require the excavation and transport of soil, this is not considered significant in the context of a residential development.	No.
Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?	No. The development comprises a residential proposal that will not give rise to pollutants. Construction activities will be subject to on-site management.	No.
Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	No. The development comprises a residential proposal that will not give rise to noise/vibration impact, light, heat energy or electromagnetic radiation. Construction activities will be subject to on-site management to alleviate any short term impacts.	No.
Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No. The development will connect to the existing public mains water supply and drainage systems. Construction management will ensure no impacts will affect surface or ground water.	No.
Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?	No. Best construction practice will alleviate the risk of accidents during the construction stage.	No.



<p>Will the Project result in environmentally related social changes, for example, in demography traditional lifestyles, employment?</p>	<p>No. The new residential development will add marginally to the local population but this is not deemed a significant impact. No traditional lifestyles or employment will be affected as a result of this development.</p>	<p>No.</p>
<p>Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the locality</p>	<p>No. There are no significant planned developments in the area that will give rise to cumulative impacts.</p>	<p>No.</p>
<p>Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for the ecological, landscape, cultural or other value, which could be affected by the Project?</p>	<p>No. This is confirmed in the assessments included with the planning application.</p>	<p>No.</p>
<p>Are there any other areas on or around the location that are important or sensitive for reasons of their ecology eg. Wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands that could be affected by the Project?</p>	<p>No. The site does not directly adjoin any environmentally sensitive areas as confirmed in the Appropriate Assessment Screening enclosed with the planning application.</p>	<p>No.</p>
<p>Are there any areas on or around the location that are used by protected, important or sensitive species of fauna or flora eg. For breeding, nesting, foraging, resting, overwintering, migration which could be affected by the project?</p>	<p>Yes. Bats are discussed in the next column. For completeness other species are noted below. There are no habitats which are examples of those listed in Annex II of the Habitats Directive and no habitat suitable for protected species of plants. No direct evidence of any mammal activity was recorded. There is no evidence that Badger use the site and no sett is present. Records from the National Biodiversity Data Centre do not indicate Badger activity in this area. There was no evidence that Irish Hare is present while habitat is considered too isolated from other woodland areas to support Deer, Pine Marten or Red Squirrel. Small mammals such as the Irish Stoat, Hedgehog and Pygmy Shrew are considered more or less ubiquitous in the Irish countryside, including on land in suburban areas (Lysaght &amp; Marnell, 2016). While Rabbits <i>Oryctolagus cuniculus</i> and Fox <i>Vulpes vulpes</i> are common in Cork along with Brown Rat <i>Rattus norvegicus</i>, House Mouse <i>Mus domesticus</i> and Field Mouse</p>	<p>No. The Bat Survey Report confirms 5 no. Common Pipstrelle roosts, 2 no. Leisler's Bat roosts and 4 no. Soprano Pipistrelle roosts were noted on site over 2 no. season surveys. All roosts were of individuals or up to three bats, with no large maternity roosts found.</p> <p>The Report recommends 11 no. impact alleviation measures, which have been integrated into the proposed development and construction strategy accordingly. This includes dark sky provision, bat boxes and bat tubes, as well as public lighting recommendations. Associated landscape design impact alleviation measures are outlined in further detail in DWG No. 60619639-SHT-20-L-0003, Bat Protection, prepared by Aecom. Construction alleviation measures are noted in the Ecological Impact Statement, prepared by Openfield Ecology and the Construction Environmental Management Plan prepared by O'Callaghan Moran &amp; Associates.</p>



	<p>Apodemus sylvaticus, these species are not protected. A breeding bird survey was carried out in May 2020 and the following species were noted: Wood Pigeon Columba palumbus, Magpie Pica pica, Blue Tit Parus caeruleus, Jackdaw Corvus monedula, Feral Pigeon C. livia and Wren Troglodytes troglodytes. These species are of low conservation concern/green list (Colhoun &amp; Cummins, 2013). Suitable nesting habitat is available for common garden birds in small patches of Brambles and Ivy as well as in large buildings. During the November survey the following birds were noted: Wood Pigeon, Hooded Crow Corvus corone, Magpie, Feral Pigeon and Jackdaw. The lands are not suitable for wintering wetland or wading birds associated with coastal inlets and estuaries. There is no suitable habitat for breeding Common Frog Rana temporaria or Smooth Newt Lissotriton vulgaris as there are no wetlands. There are no habitats on the site suitable for fish. The nearby River Lee is of fisheries value and is suitable for migratory fish such as salmonids, European Eel Anguilla Anguilla and Lamprey Lampetra sp. species. Most habitats, even highly altered ones, are likely to harbour a wide diversity of invertebrates. In Ireland only one insect is protected by law, the Marsh Fritillary butterfly Euphydryas aurinia, and this is not to be found in this area. Other protected invertebrates are confined rare to freshwater and wetland habitats which are not present on this site. This is outlined in greater detail in the enclosed Ecological Impact Statement, prepared by Openfield Ecology and the Bat Survey Report prepared by Bat Surveys Ireland.</p>	
<p>Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?</p>	<p>No. The site is not located in proximity to any inland or other waters that will be affected by this development.</p>	<p>No.</p>
<p>Are there any features of high landscape or scenic value on or</p>	<p>Yes. The development was considered in respect of potential impact on the character of a</p>	<p>No.</p>



<p>around the location that could be affected by the Project?</p>	<p>landscape protection zoning designation which applies to the south of the site. A Landscape and Visual Impact Assessment Report concluded that no impacts arise in this regard. No new development is proposed in this area, save for landscaping.</p>	
<p>Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?</p>	<p>No. The site is not open to the public at present.</p>	<p>No.</p>
<p>Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?</p>	<p>No. The Transport and Traffic assessment enclosed with the planning application confirms that the surrounding road network and transportation routes can accommodate the proposed development.</p>	<p>No.</p>
<p>Is the Project in a location in which it is likely to be highly visible to many people?</p>	<p>Yes. The Landscape and Visual Impact Assessment carried out as part of this application confirms that the proposed development will be highly visible to many people, however this impact is deemed to be acceptable.</p>	<p>No.</p>
<p>Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?</p>	<p>Yes. “Our Lady’s Hospital” is listed as a protected structure (Ref. No. PS260.) This includes St. Kevin’s Hospital which was specifically listed in 2016. The St. Kevin’s Asylum (Hospital), Corridor Link building, St Kevin’s Chapel and St. Brigid’s Hostel are separately listed in the National Inventory of Architectural Heritage (NIAH). Planning permission is in place for the demolition of St. Brigid’s to facilitate the construction of the new Irish Water Shanakiel rising water main (CCC Reg. Ref. 18/37965). Many of the original buildings of the Our Lady’s Hospital campus have been demolished and the St Kevin’s Hospital building was severely damaged in a fire in 2017. The project allows for the restoration of the St Kevin’s Hospital Building and the partial demolition of the Corridor Link Building. A Conservation Impact Report has been prepared in respect of this proposed development, in addition the archaeological assessment carried out in respect of this development confirm no impacts in this regard.</p>	<p>No.</p>



Is the Project located in a previously undeveloped area where there will be loss of greenfield land	No. Many of the original buildings of the Our Lady's Hospital campus have been demolished and the St Kevin's Hospital building was severely damaged in a fire in 2017. Thus, the lands may be better classified as 'brownfield' and are not currently open to the public.	No. The lands have no amenity value at present being unavailable for public use.
Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?	Yes. The site adjoins existing residential developments on its boundaries.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these properties will arise.
Are there any plans for future land uses within or around the location that could be affected by the Project?	No. All existing land uses in the site vicinity are well established comprising residential and institutional.	No.
Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?	Yes. The site is located within a well-established existing suburban area.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.
Are there any areas within or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the Project?	No. The subject site adjoins substantially residential uses. An existing chapel on the site, which has been decommissioned, is to be restored and converted for office use.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.
Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?	No.	No.
Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?	No.	No.
Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?	No.	No.