

St Edmundsbury Hospital

EIAR Scoping Report

April 2026

Project number: 2023s0007

The Governors of St Patrick's Hospital

A large, abstract graphic on the right side of the page, consisting of several overlapping, parallel diagonal lines. The lines are colored in shades of teal and lime green, creating a sense of depth and movement.

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Contract

This report describes work commissioned by St Patricks Mental Health Services, by a letter dated 15/12/2022. Conor O'Neill and Anna Doyle of JBA Consulting carried out this work.

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Purpose

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Contents

Contents.....	ii
1 Introduction	1
1.1 Purpose of this Report	1
1.2 Project Background.....	1
1.3 Study Area	2
2 Legislation and Policy Context	5
2.1 Legislative Context for EIAR in Ireland.....	5
2.2 Planning Policy Context	5
2.3 Environmental Impact Assessment.....	5
3 Consultation Process	7
3.1 Requirement for Consultation	7
3.2 Formal Scoping Consultation	7
3.3 Public Consultation	7
4 Alternatives and Preferred Option	8
4.1 Need for the Proposed Development	8
4.2 Alternatives Considered	10
4.3 Preferred Option - St Edmundsbury Lucan Redevelopment	10
4.4 Development Proposal.....	11
4.5 Outline of Proposed Development	12
5 Scoping of EIAR	14
5.1 Introduction to Environmental Factors.....	14
5.2 Population and Human Health	14
5.3 Biodiversity.....	15
5.4 Land and Soil	16
5.5 Water	17
5.6 Air and Climate.....	18
5.7 Noise.....	19
5.8 Material Assets.....	21
5.9 Cultural Heritage	21
5.10 Landscape and Visual Amenity	24
5.11 Interactions	25
5.12 Cumulative Impacts.....	26
6 Conclusions	30
Appendices	31
A Consultation List	31
B Consultation Scoping Responses.....	32

List of Figures

Figure 1.1: Site Location	3
Figure 1.2: Site context showing designations in the area	4
Figure 4.1: Proposed Development	13

List of Tables

Table 3.1: List of responses received from EIAR Scoping Consultation	7
Table 5.1: Natura 2000 sites within 15km of the proposed development	15
Table 5.2: RMPs in the surrounding area	22
Table 5.3: RMPs within the Zone of Archaeological Potential	22
Table 5.4: RPS structures within the site boundary	22
Table 5.5: Recent planning applications in the vicinity of the proposed development. This list will be updated extensively during the EIAR	26
Table 6.1: Summary of the scoping assessment findings	30

Abbreviations

- AA - Appropriate Assessment
- CEMP - Construction and Environmental Management Plan
- EclA - Ecological Impact Assessment
- EIAR - Environmental Impact Assessment Report
- GSI - Geological Survey Ireland
- IFI - Inland Fisheries Ireland
- LAP - Local Area Plan
- NIAH - National Inventory of Architectural Heritage
- NMS - National Monuments Service
- SFRA - Strategic Flood Risk Assessment
- WFD - Water Framework Directive
- Zol - Zone of Influence

1 Introduction

1.1 Purpose of this Report

This Scoping Report forms the first stage in the preparation of an Environmental Impact Assessment Report (EIAR) for a proposed healthcare development within the grounds of the existing St Edmundsbury Hospital in Lucan, South Dublin. The Scoping Report introduces the proposed development, defines the location and extent of works, identifies the key environmental issues and receptors in the vicinity, the potential impacts of the proposal, and identifies the likely environmental studies that are required to inform the full EIAR.

The information in this report is based on:

- Existing environmental data from online mapping and reports; and
- Consultation with stakeholders and the public.

1.2 Project Background

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

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

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

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

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

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

1.3 Study Area

The study area for the proposed development is shown overleaf in Figure 1.1, it is located east of Lucan town centre, south Dublin. The site comprises a series of established hospital buildings and historical stone walls and artefacts all set within extensive woodland belts and open grassland.

The site is bounded to the north by farmland, a school and a farmyard area located on the eastern boundary, a pre-school to the west, with the River Liffey beyond. Lucan Road is to the south with a residential area beyond.

1.3.1 Site designations

Figure 1.2 overleaf shows the designations covering the site and its surrounds from the South Dublin County Development Plan 2022-2028. The site is adjacent to a Special Amenity Area Order which wraps around the western part of the site, additionally a proposed Natural Heritage Area woodland is within the centre of the site. There are five features from the Record of Protected Structures within the site boundary, and the site is within an area covered by Specific Local Objective EDE20 SLO:1.

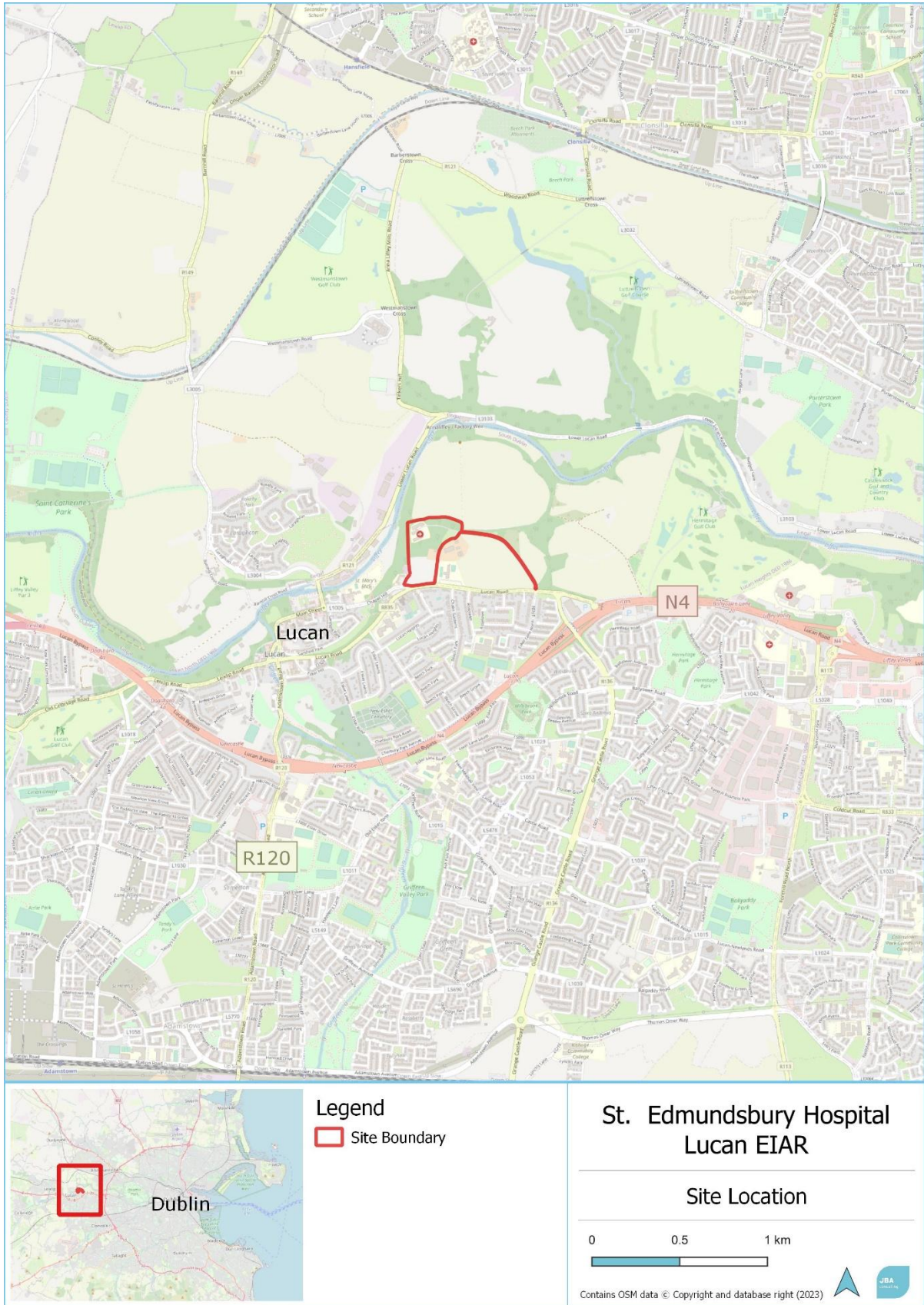


Figure 1.1: Site Location

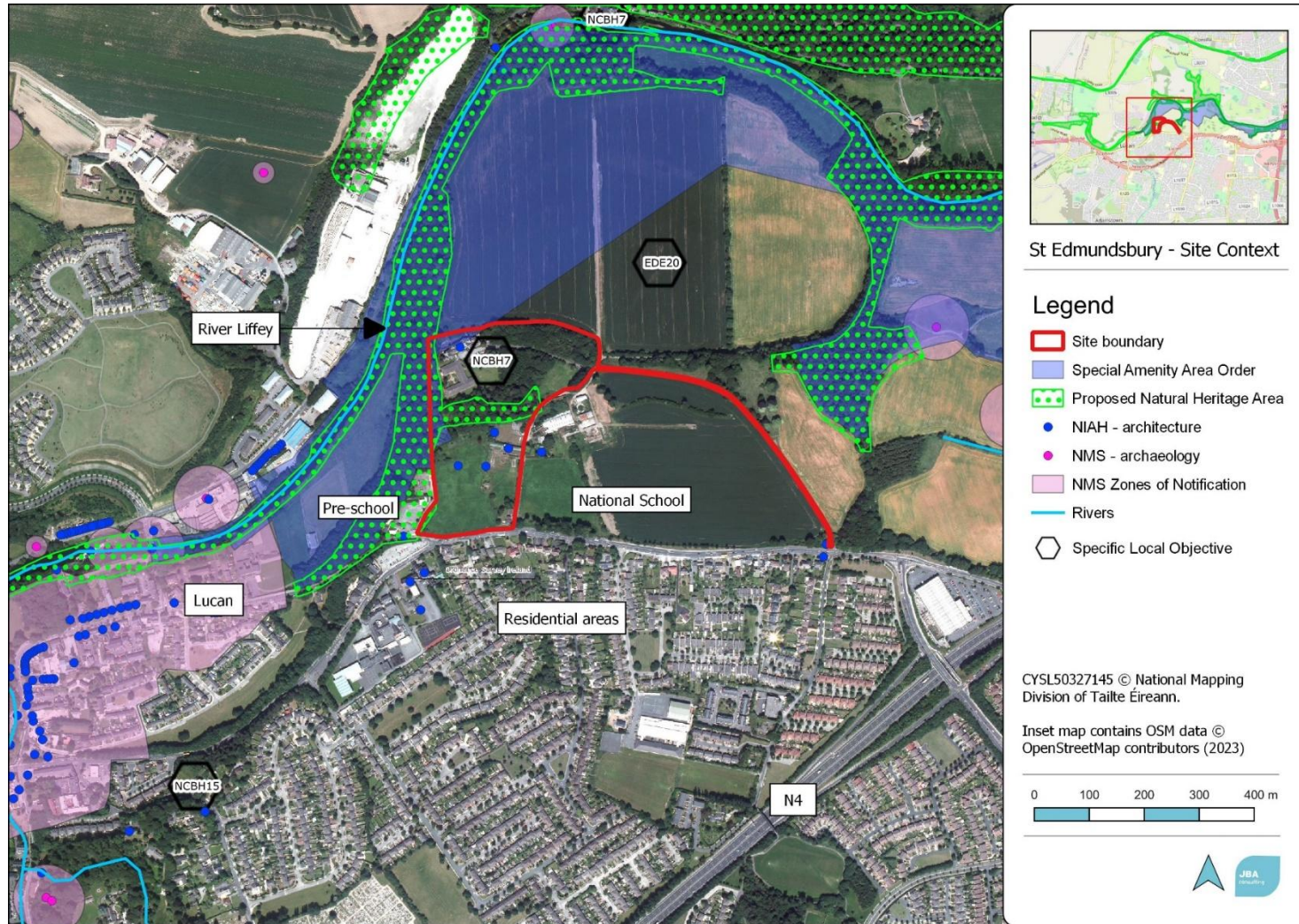


Figure 1.2: Site context showing designations in the area

2 Legislation and Policy Context

2.1 Legislative Context for EIAR in Ireland

The Planning and Development Act 2000, as amended, provides for a special planning application process for what is termed "strategic infrastructure development" (SID). Developments which fall under the definition of SID go directly to An Coimisiún Pleanála for planning permission.

Types of development which are included in the Seventh Schedule of the 2000 Act, as amended, are required to go to the Board for a pre-application consultation before making the application, under Section 37B of the 2000 Act. Part 4 of Schedule 7, as substituted by the Environment (Miscellaneous Provisions) Act 2011, is as follows:

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

The proposed development, being a healthcare facility of over 100 beds, falls within the above category, and requires pre-application consultation with the Board.

Following consultation, if the Board is of the opinion that the proposed development falls within one or more of paragraphs (a) to (c) of Section 37A(2) of the 2000 Act, the proposed development is then classed as SID, and must be submitted to the Board for planning permission.

2.1.1 The Planning and Development Act 2000 - Mandatory EIAR

The Planning and Development Act 2000, as amended, Section 37E(1) states that "an application for permission for development in respect of which a notice has been served under Section 37B(4)(a) shall be made to the Board and shall be accompanied by an environmental impact assessment report".

An environmental impact assessment is therefore required to be prepared and submitted to support the planning application.

2.2 Planning Policy Context

2.2.1 County Development Plan

The site is within South Dublin County Council. The relevant plan is the South Dublin County Development Plan (CDP) 2022-2028.

The site is zoned Objective HA-LV (High Amenity): To protect and enhance the outstanding character and amenity of the Liffey Valley. The site is also subject to a Specific Local Objective (SLO) in the CDP:

NCBH7 SLO2: To work in collaboration with the owners of St Patricks Hospital lands at St Edmundsbury, Lucan in the preparation of a Masterplan to examine the potential for the future provision of mental health services and accommodation on the existing hospital campus lands. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles and the need to provide appropriate public access including an area of accessible public realm within the lands and connectivity to adjacent lands to further the overall objective of developing a Liffey Valley public park.

2.3 Environmental Impact Assessment

The EIAR will be undertaken in accordance with the requirements of Directive 2014/52/EU on the assessment of the effects of a development on the environment. The EIAR will also be undertaken in accordance with the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022).

2.3.1 EIA Scoping

Scoping is a vital part of the EIA process, as it allows the EIA to be as tightly focused as possible. According to the EPA's 2022 Guidance, scoping should be guided by the following criteria:

- 'Likely' and 'Significant' are the principal criteria for determining what should be addressed. Any issues that do not pass this test (i.e., are not both likely and significant effects) should be omitted (scoped out) from further assessment. A section of the EIA should describe the scoping process explaining why such issues have been scoped out and they are not being considered further. All the prescribed environmental factors need to be listed in the scoping section of the EIA:
 - Population and Human Health;
 - Biodiversity;
 - Land;
 - Soil;
 - Water;
 - Air;
 - Climate;
 - Material Assets;
 - Cultural Heritage;
 - Landscape; and
 - Interactions.
- It is important to note that the environmental factors themselves cannot be scoped out and must feature in the EIA. Only subtopics and headings related to each factor can be scoped in or out. Each environmental factor should be clearly covered by one or more specific section headings in the EIA. If scoping determines that no likely significant issues arise under any heading, then an explanatory text should be included.
- Precedence - where EIAs for similar projects on similar sites or for other project proposals for the same site are available, these can be useful references.
- Interactions – careful consideration of pathways – direct and indirect – that can magnify effects through the interaction or accumulation of effects – for instance the potential for cumulative significant effects to arise from multiple non-significant effects.

3 Consultation Process

3.1 Requirement for Consultation

The EIAR requirements for consultation are defined in the EIA Directive (85/337/EEC) as amended in 2011 Directive 2011/92/EU and 2014 Directive 2014/52/EU under Article 6.

Article 6 (1)

Member States shall take the measures necessary to ensure that the authorities likely to be concerned by the project by reason of their specific environmental responsibilities are given an opportunity to express their opinion on the information supplied by the developer and on the request for development consent.

Statutory Authorities referred to in Article 6 (1) will be consulted on the specific characteristics of the project, including its location, technical capacity, and its likely impacts on the environment. Also, in accordance with the requirements of the Aarhus Convention, the public, statutory authorities, and relevant stakeholders will be given the opportunity to participate in the decision-making process, this integration will allow for the sustainable implementation of environmental management.

3.2 Formal Scoping Consultation

This Scoping Report has been issued to Statutory Consultees listed in Appendix A. Sufficient time was allocated to ensure clarity and consistency of the consultation and ensure that relevant statutory consultees have had the opportunity to participate. All submissions (responses, comments, and recommendations) will be appended to the final version of this document, they will be acknowledged in the EIAR and will inform the final scope of the EIAR.

Of the consultees contacted, the following responses were submitted (Table 3.1).

Table 3.1: List of responses received from EIAR Scoping Consultation

Consultee	Response	Response Date
Geological Survey Ireland (GSI)	Email with letter detailing publicly available GSI datasets that should be used to carry out the EIAR, and an accompanying list of dataset names and links.	12/06/2023
Inland Fisheries Ireland (IFI)	Email with letter detailing recommendations relating to maintaining the ecological status of aquatic habitats that are included within the EIAR.	21/06/2023
Uisce Éireann	Email with letter detailing recommendations with regard to water infrastructure for EIARs.	21/06/2023

3.3 Public Consultation

A public information event will be held to allow the public to learn about the proposed development and comment on the EIAR process. The comments received from the Public Consultation will be addressed in the EIAR.

4 Alternatives and Preferred Option

Directive 2014/52/EU requires the main alternatives to the proposed development to be considered and presented in the EIAR:

"A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects".

4.1 Need for the Proposed Development

St. Patrick's Mental Health Services (SPMHS) is the largest independent provider of mental health care in Ireland and comprises of two campuses: St. Patrick's University Hospital, James' Street, Dublin 8 and St. Edmundsbury Hospital, Lucan, Co. Dublin. In addition, SPMHS operate several community-based services by way of Dean Clinics located across the country. St. Patrick's University Hospital has been based in inner-city Dublin since its foundation in 1746 with money bequeathed by Jonathan Swift following his death in 1745. Since its inception, SPMHS have sought to provide the highest quality of mental health care to the people of Ireland.

SPMHS facilitates for more than 3,000 in-patient admissions per year, over 15,000-day care group therapy sessions per year, in addition to approximately 15,000 community-based individual treatment and care sessions in the Dean Community Mental Healthcare Clinics. SPMHS provides services for a wide range of mental illnesses and mental health difficulties including Addictions & Dual Diagnoses, Anxiety Disorders, Bipolar and other Mood Disorders, Eating Disorders, Depression and Psychoses. It also provides specialist services centred on Young Adults, Adolescents and Older Adults. Many services are now delivered through Technology-Mediated Interventions (TMI) where services are delivered remotely to people in their own homes on an individual and group basis.

Currently, the Board and Management are working to consolidate St. Patrick's Mental Health Services into a national centre of excellence for mental health care, research, and education. As part of the Organizations commitment in continuing to honour Swifts' vision, they now wish to redevelop their physical infrastructure for the continued benefit of future generations. This next phase in the evolution of SPMHS will consolidate and enhance their capability to provide the highest quality of care to more people, while greatly improving the physical environment and experience for future service users.

The proposed development is identified as a Specific Local Objective (SLO) in the SDCC Development Plan:

NCBH7 SLO2: To work in collaboration with the owners of St Patricks Hospital lands at St Edmundsbury, Lucan in the preparation of a Masterplan to examine the potential for the future provision of mental health services and accommodation on the existing hospital campus lands. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles and the need to provide appropriate public access including an area of accessible public realm within the lands and connectivity to adjacent lands to further the overall objective of developing a Liffey Valley public park.

4.1.1 Vision

Since 2017, TOT Architects have worked closely with the Board and Management of St. Patrick's Mental Health Services to aid in the realization of a national centre of excellence for mental health care, research, and education. This vision, as outlined below, is set within a strict requirement to maintain the level of services that currently operate at a minimum 96% In-Patient capacity on any given day. This is in addition to Day Services & TMI sessions.

Vision Outline

- Creation of an Exemplar National Mental Health Facility;
- Change Public Perception of Mental Health Issues and Service Provision;

- Provide a Robust Campus Wide Plan, Allowing for Maximum Flexibility with Adopted Designs;
- Creation of a Sense of Arrival & Individuality for Service User & Visitor;
- Enhancement of Patient Dignity and Experience;
- Upgrade & Consolidation of In-Patient Facilities;
- Upgrade & Consolidation of Day Service Facilities;
- Efficient Cross-Over of In-Patient, Day Service & TMI Packages;
- Creation of a Safe & Secure Environment for All;
- Creation of a More Radically Open Environment; and
- Future Proof New Facilities in Anticipation of Tighter Regulatory Requirements.

4.1.2 SPMHS Development Plan

4.1.2.1 James' Street Campus

The James' Street Campus dates from 1757 and currently operates a total of 255 In-patient bed spaces in tandem with the many out-patient clinical & group sessions that also overlap with In-patient services. This is coupled with extensive research, training, and educational departments. Inpatient services are spread across eight wards, some of which are still located within the original George Semple 1757 historic core. As the Campus has developed over the centuries, the standard of accommodation varies significantly in age, size and provision ranging from:

- Single bedroom with shared sanitary provision;
- Shared dormitory with shared sanitary provision; and
- Single bedroom with ensuite provision.

The campus can be divided into 3 distinct groupings namely: Adult In-Patient, Adolescent In-Patient, and Day Care Services. Supporting these departments are the many important services including Nursing, Clinical, Education, Sports, Catering, Administration, Human Resources, Housekeeping, Grounds + Garden Maintenance, and various Technical Services. The departments are spread around the campus in a diverse manner with little or no physical connections in some instances. Development of the campus has occurred on a needs basis with the result that growth has been 'ad-hoc' with little consideration given to coherent development of the site. With an ever increasing demand for mental health service provision, this has added increased pressure on the existing facility and capacity to operate in a more flexible manner, as the hospital responds to changing needs. Heretofore, the hospital has managed to utilize space within existing buildings coupled with significant expenditure in upgrade of older building stock. Where SPMHS is to realize its vision as it progresses into the 21st Century, a significant reorganization of existing infrastructure and accommodation standards shall be required.

4.1.2.2 Saint Edmundsbury Campus

Built by Edmund Sexton Pery (1719-1806) the St Edmundsbury Estate House and a significant portion of associated lands were acquired by SPMHS in 1898. The first in-patients were admitted in March of 1899, initially comprising of convalescing female in-patients from St James' Street. The surrounding site comprised of a working farm with walled gardens that serviced the hospital's needs. Sadly, the original farm and gardens have fallen into disrepair along with the dispersal of parts of the original land holdings.

Currently, St Edmundsbury is home to a 52 Bed In-Patient Facility (built 1985) linked to the Historic Building. The Historic Building is also home to Inpatient and Staff facilities in addition to accommodating a dedicated Day Service Unit. Since the outbreak of Covid 19, the 52 bed In-patient facility has served as a dedicated Covid Isolation Ward for the Dublin 8 Campus. A standalone Dean Clinic, located at the main entrance to the site, completes the community services provision on site.

4.2 Alternatives Considered

4.2.1 Do-Nothing

The do-nothing option would see SPMHS continue in their existing facilities, with no development or changes taking place.

This is not an option for the future viability of SPMHS, particularly as an In-patient Service Provider. Their existing real estate, comprising in the main of old and outdated buildings are nearing end of life and no longer provide the requisite efficiencies or built environment for mental health service provision. Where the option to do nothing is pursued, the goals set out by SPMHS vision will not be achieved and the ability to maintain provision of services in the long term will become increasingly diminished.

As the do-nothing option is not a viable option for SPMHS, it is not considered further in this report.

4.2.2 Dublin 8 Redevelopment

Since 2017, TOT Architects have worked closely with the Board and Management of St. Patrick's Mental Health Services to put in place a comprehensive Development Control Plan (DCP) for their Dublin 8 Campus (St. Patrick's University Hospital, James' Street, Dublin). This is comprised of nine (9) Main Development Phases complete with decanting, demolition, and construction subphases.

In order to maintain the existing provision of services on site, a continuous building program in excess of fifteen (15) years would be required to complete the redevelopment of the campus. This is primarily due to maintaining existing operations and the associated safety and logistical challenges in achieving same. While SPMHS have applied for and obtained Grants of Permission for the initial phases of the proposed DCP, it has become increasingly apparent that funding a rebuilding program of such magnitude and complexity, is proving cost prohibitive without a significant down scaling in provision of their current services over a several year period. This is also set against a marked increase in demand for quality mental health provision within the State. This realization has led to a renewed focus on the SPMHS folio and how best to achieve their stated vision in a more viable manner.

Under the Proposed Development Control Plan, SPMHS have applied for Planning Permission to Dublin City for the following:

- Phase 1: Relocation of Existing & Enhancement of Day & In-Patient Clinical Services. Grant of Permission: Ref - 3609/17;
- Phase 2: Construction of a new Special Care Unit and General Adult Wards complete with new Clinical Hub. Grant of Permission: Ref - 3760/17;
- Phase 3: Construction of In-Patient Extension to Existing Adolescent Unit and Establishment of a National Hub for Mentally Healthy Living. Grant of Permission: Ref - 2881/19; and
- Phase 4: The maintenance and upgrade works, to the original historic building (Protected Structure) Grant of Permission: Ref - 3387/22.

Stemming from the above, SPMHS are currently reviewing redevelopment options for their Dublin 8 campus with a clear commitment to maintaining a permanent presence within its Historic Core. This has led to a renewed focus and further detailed analysis of their Lucan facility and how this may become a more viable option for the continuance of SPMHS operations. Such a move would entail relocating the majority of existing services that are currently provided in Dublin 8, to a purpose built, state of the art facility in St Edmundsbury. It is further reasoned that the proposed development is eminently viable from a timing and capital expenditure perspective. The development can be completed as a single phase, within a circa. thirty (30) month construction program.

4.3 Preferred Option - St Edmundsbury Lucan Redevelopment

4.3.1 Overview

The proposal as outlined here is to create a world-class Adult and Adolescent Inpatient mental health facility complete with Daycare, Dean Clinic Services, Research, Educational and Advocacy programs on the site of St Edmundsbury Hospital. These will compliment retained services in Dublin

8. Paramount to this will be the enhancement of service user dignity, experience and the breaking down of public misconceptions surrounding mental health issues.

In achieving this, it is recognized that Saint Edmundsbury holds no less challenges than exist in Dublin 8, in particular, integration of such a facility within the 'Natural, Cultural and Built Heritage-Liffey River Valley and Special Amenity Order' zoning (South Dublin County Council Development Plan 2022 – 2028). Best Evidence Based Clinical Design recognizes that a greater connection to, and integration of biophilia, set within a positive sense of place, contributes significantly to the wellbeing and positive experiences of mental health service users. On first visit to St Edmundsbury, it was clear these qualities permeate throughout the site, if having somewhat fallen into neglect.

4.3.2 Existing Site

St Edmundsbury Hospital (C. 7.03Ha) is accessed off the R835 Lucan Road at two locations that also form a long - established public right of way 'walking loop' around the inner edges of the site. The Existing Hospital facility is located to the northwest corner of the site, set within secluded wood lands. Access to the hospital buildings is via the loop road. The public are not encouraged to detour into and around the immediate facility. The southern portion of the site comprises of an overgrown and derelict farmyard and partly demolished walled garden. Both elements are associated with the original estate and are not accessible to the public. The derelict building areas have also become a home for antisocial activity adjacent to the hospital site.

The adjoining lands comprise of the following:

- North: Arable Farm and Mature Wood Lands;
- South: Lucan Road (R385) with predominant residential housing fronting onto south side;
- East: Arable Farmlands, Semi Derelict Farmyard and St Andrew's National School; and
- West: Mature Wood Lands, ESB Step Down Station and 'The Village' Montessori Pre-School.

4.3.3 Proposed Key Site Interventions

- Retain public walking loop and enhance public interaction / experience;
- Increased woodland and site wide planting;
- Refurbishment and repurposing of historic farm building(s) into proposed new hospital facility;
- Creation of a public Café in the historic barn interface with walking loop;
- Repurposing of the historic walled garden into proposed new 200-bedroom in-patient adult hospital facility with surrounding gardens;
- Demolition of existing 52 bed adult in-patient facility (currently connected to St Edmundsbury House) and construction of a new standalone: 14 bed in-patient adolescent unit on same site;
- Refurbishment and repair of St Edmundsbury House as may be required from undoing of contemporary alterations;
- Creation of a welcoming and open interface between SPMHS and its surroundings;
- Creation of feature landscaping and natural screening and associated hospital carparking provision; and
- Widening of site entrance located at existing Dean Clinic Service.

4.4 Development Proposal

The principal development will comprise of a 200 Bed In-patient, general psychiatric Adult Hospital set in and around the existing historic walled garden, refurbishment, and repurposing of Historic Farm Buildings in support of Adult Hospital operations, the construction of a new 14 Bed In-patient, general psychiatric Adolescent Unit to be located on the site of existing 52 bed unit and continued use of St Edmundsbury house for extended Day Care Service Provision.

4.5 Outline of Proposed Development

The proposed development will consist of a 214 no. bed mental health facility and all ancillary site development, site services, utilities and landscaping works (“the proposed development”), all at the c. 7.03 ha site, located at St Edmundsbury Hospital, Lucan Road, Lucan, Co. Dublin, K78 NW63. The development will consist of a new c. 19,240 sqm mental health facility within the grounds of the existing St. Edmundsbury Hospital (Protected Structures: RPS Ref Nos. 003, 008, 010, 012, 013, 028.) The cumulative area of all proposed new and refurbished buildings is c. 21,652 sqm.

The proposed development will consist of 200 no. adult in-patient beds and 14 no. adolescent in-patient beds, located in and around the existing historic walled garden within the southern portion of the site, arranged in X no. 1-2 no. storey blocks. The new mental health facility blocks will provide adult and adolescent in-patient service rooms; adult and adolescent day services rooms; patient care services rooms; patient pharmacy; laboratories; staff and patient restaurant facilities; consultant and hospital administration accommodation; staff welfare facilities; reconfigured and additional new car and cycle parking facilities; signage and wayfinding. The development is to be constructed through the refurbishment, repurposing and reorganisation of existing historic farm buildings (c. 1,040 sq m) and associated structures to the southern part of the St. Edmundsbury hospital site, with c. XXX sqm of existing structures to be demolished to facilitate the proposed development. This includes the demolition of the existing 52 no. bed X no storey unit (c. XXXX sq m) located at X. A c. 128 sq m 1 no. storey energy centre building is also to be constructed to the north of the proposed XXX sq m X no. storey Consultant Building, replacing an existing c. xx sq m shed, within the cluster of derelict farm buildings.

Description of access arrangements and wall etc

Associated site development works will include the provision of XXXX sq m public open space, including public walking and cycling facilities; private and secure user gardens (XXXX sq m); XXXX sq m plant and associated screening, including gas infrastructure tanks; public lighting; all piped infrastructure and ducting; EV charging facilities; X no. ESB substation; X no. attenuation tanks; rainwater harvesting tanks; PVs; SUDs including green roof provision; services provision; boundary treatments; waste marshalling compound storage area; hard and soft landscaping; changes in level and retaining walls; internal roads and paths, including vehicle set down areas; site clearance works; services provision and related ducting, piping and cabling; retaining walls; and all associated site development and excavation works above and below ground.

The proposed development is shown in Figure 4.1.



Figure 4.1: Proposed Development

5 Scoping of EIAR

5.1 Introduction to Environmental Factors

In accordance with Directive 2014/52/EU and the EPA Guidance (2022) the environmental factors to be addressed in the EIAR are:

- Population and Human Health;
- Biodiversity;
- Land and Soil;
- Water;
- Air and Climate;
- Noise;
- Material Assets;
- Cultural Heritage;
- Landscape and Visual Amenity;
- Interaction between the above elements; and
- Cumulative Impacts.

The following Sections outline the receiving environment and the sensitive environmental receptors for the study area. Each environmental factor will be addressed identifying the following:

- Receiving Environment and Sensitive Receptors
- Potential Impacts
- Assessment Methodology
- Summary.

5.2 Population and Human Health

5.2.1 Receiving Environment and Sensitive Receptors

St Patrick's Mental Health Services provides in-patient and out-patient services and care at three facilities St Edmundsbury House. The facility has 52 beds for in-patient services, and additional out-patient space. The facility caters mainly for people who reside outside Dublin City, with out-patient surveys showing nearly 85% travel from County Dublin and the rest of the country.

Lucan is within the suburbs of Dublin City, located on the busy N4 corridor. Lucan is regarded as one of the critical areas for delivering services, retail, and economic activity in the suburb areas. According to the SDCC CDP 2022-2028, the population of the Lucan/Adamstown/Palmerstown area is anticipated to grow by 16%, to over 68,000.

5.2.2 Potential Impacts

During construction there is a risk to the health and safety of workers on the development, as with any construction project. There is also potential for negative impacts and disturbance to the community from construction.

Once operational, the proposed development will not result in significant negative impacts for population and human health. Long-term positive impacts will result from the operation of the scheme.

5.2.3 Assessment Methodology

A desktop study will be carried out to establish the baseline associated with economic activity, employment opportunities, settlement and social patterns. Noise and dust generation during construction will be assessed in air and noise chapter, positive impacts and improved quality of life due to the scheme will be discussed in the EIAR.

5.2.4 Summary

This section has assessed that there are likely to be potential impacts on population and human health during the construction phase of the scheme, therefore these aspects will be considered further in the EIAR Construction chapter. No significant impacts are expected during operation, and this can be scoped out.

5.3 Biodiversity

An initial scoping assessment of the potential impacts of the proposed development on biodiversity was undertaken.

5.3.1 Receiving Environment and Sensitive Receptors

Baseline data has been and will be gathered, from a comprehensive desk-based assessment and fieldwork surveys conducted by JBA Ecologists.

Natura 2000 sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) and proposed Natural Heritage Areas (pNHA) within 15km of the proposed development are shown in Table 5.1. The AA Screening will assess the Natura 2000 sites, while the EclA will assess the pNHAs and any other sensitive ecological receptors within the proposed developments Zone of Influence (ZoI).

Table 5.1: Natura 2000 sites within 15km of the proposed development

Natura 2000 site	Site Code	Approximate distance from site
Liffey Valley pNHA	000128	0.0km (partially within site boundary)
Royal Canal pNHA	002103	1.4km
Grand Canal pNHA	002104	3.2km
Rye Water Valley/Cartron pNHA	001398	3.4
Rye Water Valley/Cartron SAC	001398	3.4
Lugmore Glen pNHA	001212	10.0km
Dodder Valley pNHA	000991	10.3km
Slade of Saggart and Crooksling Glen	000211	10.6km
Glenasmole Valley pNHA	001209	12.1km
Glenasmole Valley SAC	001209	12.1km
Santry Demesne pNHA	000178	12.6km
North Dublin Bay pNHA	000206	13.3km
South Dublin Bay and River Tolka Estuary SPA	004024	13.6km
Wicklow Mountains SAC	002122	14.2km

5.3.2 Potential Impacts

A portion of the development site is designated as the Liffey Valley pNHA. The site also contains protected woodland, part of which is proposed to be removed to facilitate the new hospital building. These designated sites and other valued local ecological receptors may be subject to significant adverse impacts via surface water, groundwater and air source-receptor pathways. These impacts may extend downstream into the River Liffey or Dublin Bay, impacting aquatic habitats and the aquatic and semi-aquatic species which inhabit them.

There is potential for the spread of non-native invasive species during the construction phase. This could lead to significant negative impacts, particularly within the Liffey Valley pNHA.

5.3.3 Assessment Methodology

Ecological receptors that must be examined include protected Natura 2000 sites under the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), as well as species protected under the Wildlife Act (1976), and any ecological receptors which may be negatively impacted by the proposed development, both directly and indirectly.

Extensive desk-based assessment and site surveys will be undertaken. These will determine the species and habitats on site that might be impacted during the development's construction and operational phases.

An Ecological Impact Assessment (EclA) will also be completed. This will assess the likely impact of the development on ecological receptors, including species and habitats. The EclA will also outline strict mitigation measures where required.

The following surveys will be undertaken:

- Bird;
- Habitat (including protected flora and invasives);
- Bat; and
- Mammals.

Should these surveys reveal the presence of further, previously un-recorded protected species, the need to conduct additional surveys may arise and shall be carried out.

In parallel with the EIAR, an Appropriate Assessment (AA) Screening will be completed by JBA Consulting for this project to determine whether there is a potential for impacts on Natura 2000 sites within the proposed development's ZoI. If impacts to Natura 2000 sites are found to be significant and likely, a Stage 2 Natura Impact Statement (NIS) will be completed.

5.3.4 Summary

This section has assessed that there are likely to be potential impacts on biodiversity aspects during the construction and operation phase, therefore these aspects will be considered further in the EIAR.

5.4 Land and Soil

5.4.1 Receiving Environment and Sensitive Receptors

The underlying bedrock of the eastern section of the site is composed of Calcareous shale limestone conglomerate from the Tober Colleen Formation. The bedrock of the western section of the site is composed of dark limestone and shale of the Lucan Formation.

The underlying subsoil is composed of Limestone till in the southern half of the site whilst the northern half is comprised of mainly of made ground with a small section of limestone sand and gravel at the most northern part of the site.

A detailed understanding of the subsoil environment at the site will be obtained through site investigations.

5.4.2 Potential Impacts

There is potential for impacts to the soil and geology underlying the site during construction. However, deep excavations are not required so any impact is not expected to be significant.

5.4.3 Assessment Methodology

A number of walkover surveys, and the installation of trial pits and boreholes as part of site investigations will furnish relevant information on geology at the site.

The methodology for assessment of the impacts on the soil and geology will be undertaken in accordance with recommendations in "Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements" by the Institute of Geologists of Ireland (2013). The Directive requires EIA practitioners to consider the sustainable use of soil and land.

A Conceptual Site Model for the site will be developed based on the site investigations undertaken, the information on groundwater levels in the boreholes and the proposed flood management scheme. The impacts of the scheme on geology, groundwater and hydrogeology and water dependant habitats and species will be assessed, and any significant impacts will be mitigated.

The interaction between geology/soils and hydrology/hydrogeology on water dependant ecology will be discussed in the chapter of the EIAR dealing with interactions of the foregoing.

5.4.4 Summary

This section has assessed that there are likely to be potential impacts on geology and soils during the construction phase, therefore these aspects will be considered further in the EIAR.

5.5 Water

5.5.1 Receiving Environment and Sensitive Receptors

Surface Water

The proposed site lies within the Water Framework Directive (WFD) Liffey and Dublin Bay catchment and Liffey_SC_090 sub-catchment (EPA, 2020). The River Liffey flows northwards approximately 100-380m west of the proposed development and has a WFD status of "Moderate". Urban runoff and urban wastewater are pressures acting on the Liffey.

A Strategic Flood Risk Assessment (SFRA) was completed as part of the South Dublin County Development Plan 2022-2028. The development site is outside Flood Zones A (1 in 100 chance in any given year) and B (1 in 1000 chance) according to the South Dublin County SFRA.

Groundwater

The groundwater body underlying the site status is currently under review according to the EPA. Groundwater vulnerability, a measure of the likelihood of groundwater contamination occurring, within the site is classified by the Geological Survey Ireland (GSI, 2020) as 'Extreme Vulnerability'. This classification is a function of the underlying bedrock and subsoils at the site.

5.5.2 Potential Impacts

5.5.2.1 Surface Water

During construction, there is the potential for emissions of dust and silt into nearby watercourses or adjacent drains. This could therefore lead to a reduction in water quality.

5.5.2.2 Groundwater

Groundwater vulnerability underlying the site is extreme, indicating a high likelihood of groundwater contamination by human activities. The risk of groundwater contamination will only be present during the construction phase of the development; once operational, the development is unlikely to result in hydrological impacts.

5.5.3 Assessment Methodology

A review will be undertaken of construction method statements to understand if the construction activities have the potential to pollute surface water or groundwater.

The impacts on water will be assessed using the source - pathway - receptor model. A Conceptual Site Model will be prepared for the site to assessment the likelihood of an impact on groundwater during construction from the site investigations and boreholes and from the presence of any hazardous materials and during operation of the scheme. The interaction between water/groundwater and water dependant habitats and species will be explored.

The assessment methodology and significance criteria will be developed, and an assessment of the magnitude, duration and sensitivities of the receptors will be determined.

Where significant impacts are identified, recommended mitigation measures to reduce/remedy the impacts will be described. Mitigation measures during the construction of the scheme and operation of the scheme will be provided in the EIAR. A monitoring programme to assess the effectiveness of

the mitigation measures will be developed during the project. The residual impacts and cumulative impacts with other developments will be assessed.

Consultation will be undertaken with the NPWS and IFI.

5.5.4 Summary

This section has assessed that there are likely to be potential impacts on surface watercourses and groundwater during the construction and operational stages, therefore these aspects will need to be considered further in the EIAR.

5.6 Air and Climate

5.6.1 Receiving Environment and Sensitive Receptors

The Construction Phase study area is focused on potential impacts generally due to dust. These impacts occur within 500m of the dust generating activity as dust particles fall out of suspension in the air. Dust impacts during the Construction Phase due to material handling activities, including excavation and construction works, on site may typically emit dust. Deposition typically occurs in close proximity to each site and therefore the study area is limited to a 500m radius from any dust generating activities.

The study area with respect to impacts from air quality emissions from construction vehicle and HGV movements is limited to sensitive receptors less than 200m from road links which are affected by significant changes in volume (i.e., above 5%). This study area is the same for designated areas of conservation (either Irish or European designation) with respect to ecology as the potential to impact is highest within 200m of the Proposed Project and when significant changes in AADT (>5%) occur.

A desktop review of available baseline air quality data within the study area will be undertaken. The following data sources will be referred to during the desktop air quality assessment:

- Environmental Protection Agency – National Ambient Air Quality Monitoring Data Archive;
- Environmental Protection Agency – Air Quality in Ireland 2021 Report; and
- National Parks and Wildlife Service Envision Maps

5.6.2 Potential Impacts

The Air & Climate chapter will examine the potential effects of the proposed development on air quality at nearby residential properties, nearby educational facilities, nearby ecologically designated sites and at the proposed St. Edmundsbury Hospital development, in terms of air pollutant concentrations and carbon emissions impact on sensitive receivers from the permanent future impacts brought about by the development.

5.6.3 Assessment Methodology

It is proposed that an assessment of air quality and climate will be carried out in accordance with the following guidance and established best practice, and will be tailored accordingly based on professional judgement and local circumstance:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA 2022);
- Transport Infrastructure Ireland, Air Quality Assessment of Specified Infrastructure Projects (Dec. 2022).
- Transport Infrastructure Ireland, Air Quality Assessment of Specified Infrastructure Projects (Dec. 2022).
- Institute of Air Quality Management, Land-Use Planning & Development Control: Planning For Air Quality (January 2017)
- Institute of Air Quality Management, Guidance on the assessment of dust from demolition and construction (2014)
- Institute of Air Quality Management, A guide to the assessment of air quality impacts on designated nature conservation sites (2020)

In line with the above guidance, the assessment will cover potential impacts to air quality and climate by describing the existing conditions and the likely potential impacts associated with the construction and operation of the proposed development. The impact assessment process will involve:

- Assigning the receptor sensitivity;
- Determine potential for significant road traffic emissions if there is an AADT increase on the Lucan Road by >500 vehicles per day;
- Determine potential for significant heating emissions if there is a proposal to use fossil fuel for space heating requirements. It is most likely to be a renewable energy source that will be used for such a building;
- Identifying and characterising the magnitude and significance of any potential impacts;
- Incorporating measures to avoid and mitigate (reduce) these impacts; and
- Assessing the significance of any residual effects after mitigation.

The air quality assessment carried out on the proposed development will include the following elements:

- Review of standards and legislation;
- Identification of air quality issues relevant to the components of the Proposed Project;
- Review of background ambient air quality in the vicinity of the Proposed Project (relevant air quality baseline data will be obtained from the EPA);
- Assessment of potential air quality impacts of plant and equipment processes.

The assessment will take account of sensitive receptors relevant to the Proposed Project. Sensitive receptors within the vicinity of the Proposed Project may include:

- Residential dwellings;
- Recreational areas and sports grounds;
- Schools and educational establishments;
- Designated ecological area of conservation (pNHA);
- Existing & proposed hospital and healthcare facilities

A series of mitigation measures to minimise any foreseen impacts for both the Construction Phase and Operational Phase of the Proposed Project will be proposed as required as part of the EIAR.

5.6.4 Summary

Impacts on Air Quality & Climate are likely to occur both during construction and operation, and have the potential to be significant if not properly managed or mitigated. These aspects will need to be considered further in the EIAR.

5.7 Noise

5.7.1 Receiving Environment and Sensitive Receptors

Potential noise and vibration impacts associated with the proposed development are predicted to be at their most significant close to the construction works boundary, but potential impacts may be observed at further removed locations. The general area surrounding the proposed development will be assessed in order to identify the receptors that have the potential to be impacted by noise emissions associated with the project works. Noise sensitive receptors which could potentially be adversely affected by the noise and vibration impacts of proposed development construction works will be considered. The study area will encompass the nearest sensitive receptors to the proposed development site, including the nearby residential properties, nearby educational facilities, nearby ecologically designated sites and at the proposed St. Edmundsbury Hospital development.

5.7.2 Potential Impacts

The Noise chapter will examine the potential increase in noise levels during construction and operation of the development at nearby residential properties, nearby educational facilities, nearby ecologically designated sites and at the existing and proposed St. Edmundsbury Hospital development.

5.7.3 Assessment Methodology

The assessment of noise and vibration will be conducted under the relevant legislation and guidance including:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA 2022);
- World Health Organisation (WHO) Guidelines for Community Noise 1999;
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';
- British Standard 8233: 2014 Guidance on Sound Insulation and noise reduction for buildings.
- ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (Institute of Acoustics - May 2017)
- BS 4142:2014 + A1:2019 'Method of Rating and Assessing Industrial and Commercial Noise'.

In line with the above guidance, the noise impact assessment will cover potential noise impacts by describing the existing noise levels in the area and the likely potential noise impacts associated with the construction and operation of the proposed development. The impact assessment process will involve:

- Assigning the receptor sensitivity;
- Determine potential for significant road traffic noise levels if there is an AADT increase on the Lucan Road by >500 vehicles per day.
- Determine potential for significant noise emissions due to renewable energy source and other plant and equipment as required for such a healthcare building.
- Identifying and characterising the magnitude and significance of any potential noise impacts;
- Incorporating measures to avoid and mitigate (reduce) these potential noise impacts; and
- Assessing the significance of any residual effects after mitigation.

The noise impact assessment carried out on the proposed development will include the following elements:

- Review of standards and legislation;
- Identification of potential noise issues relevant to the components of the Proposed Project; and
- Assessment of potential noise impacts due to associated plant and equipment and identify suitable mitigation measure design.

The assessment will take account of sensitive receptors relevant to the Proposed Project. Noise sensitive receptors within the vicinity of the Proposed Project may include:

- Residential dwellings;
- Recreational areas and sports grounds;
- Schools and educational establishments;
- Designated ecological area of conservation (pNHA);
- Existing & proposed hospital and healthcare facilities

A series of mitigation measures to minimise any foreseen impacts for both the Construction Phase and Operational Phase of the Proposed Project will be proposed as required as part of the EIAR.

5.7.4 Summary

Noise impacts are likely to occur both during construction and operation, and have the potential to be significant if not properly managed or mitigated. These aspects will need to be considered further in the EIAR.

5.8 Material Assets

5.8.1 Receiving Environment and Sensitive Receptors

5.8.1.1 Traffic

The existing site is served by two entrance roads, both from the Lucan Road. The proposed development will close to the N4 and M50 roads, and from there to the Dublin and National road network.

The site is also served by multiple bus routes. While train and Luas routes do not serve the site directly, these services do interchange with bus routes to the site.

5.8.1.2 Utilities

Underground utilities are likely to be found in multiple locations around the site, and already serve the existing St Edmundsbury Hospital.

5.8.2 Potential Impacts

An assessment of the disruption to utilities from the proposed development will be undertaken in the next stage of the project i.e., detailed design, to understand where any utility diversions or upgrades are required. Potential impacts may result during the construction stage from any diversions or upgrades as may be required resulting in short-term effects on Roads, Footpaths and Traffic.

5.8.3 Assessment Methodology

The assessment of material assets will include a desk-based exercise, to identify properties, utilities and resources that may be affected by the proposed scheme. This may be followed by test trenching on site with the utility companies to accurately locate services in proximity to proposed construction excavation sites.

Traffic assessment will be undertaken using desk-based study and traffic count surveys. The assessment of roads and traffic will include a desk-based exercise, to identify roads, footpath, cycleways and public transport routes that may be affected during the construction phase of proposed scheme. Discussion with SDCC will be carried out in relation to required road infrastructure upgrades resulting from the proposed development in association with other planned projects.

5.8.4 Summary

Impacts during construction on material assets, including underground services, will be assessed during the Construction chapter of the EIAR.

Impacts on traffic will be reported separately in a Traffic Impact Assessment (TIA) and summarised within the Material assets Chapter of the EIAR.

5.9 Cultural Heritage

5.9.1 Receiving Environment and Sensitive Receptors

Prehistoric period: Lucan, located on the banks of the River Liffey and at the junction of the river Griffeen is located within a rich archaeological landscape where settlement activity is known to have occurred from Neolithic times. There is evidence of prehistoric settlement in Lucan as the features that attracted early people such as river access, fishing, well-drained soil and hunting were all present. Finds of polished stone axe heads (NMI Reg. No. 1975:90) and worked flints (NMI Reg. No. 1975:90, 1966:4 & 1968:151-71) all point to possible tool use in the general area from at least as early as the Neolithic (Deery, 2021).

There are eight RMP's recorded within a 1km radius of the site. The zone of archaeological potential (ZAP) in the Record of Monuments and Places (RMP) for the Historic Town of Lucan (DU017-019) is located c. 300m to the southwest of the site. The river Liffey is located c. 85m to the west of the site at the nearest point.

Although there are no recorded archaeological monuments (RMP) within the study area there is the potential for the presence of sub-surface archaeological sites, features and artefacts within the proposed site.

Table 5.2: RMPs in the surrounding area

RMP's in the surrounding area (within 1km)		
RMP	Description	Approximate proximity to site
DU017-006	Castle	747m east
DU017-016	Bridge	912m southwest
DU017-018	Castle	365m southwest
DU017-019	Lucan Historic Town	min/max 306m-1100m
DU017-076	Fish weir	546m northeast
DU017-088	Burial	413m northeast
DU017-097	Enclosure	856m east

Table 5.3: RMPs within the Zone of Archaeological Potential

RMP's within the Zone of Archaeological Potential (DU017-019- Lucan Historic Town)		
RMP	Description	Approximate proximity to site
DU017-019001	Castle - tower house	905m southwest
DU017-019002	Church	905m southwest
DU017-019003	Graveyard	905m southwest
DU017-019004	Cross	905m southwest
DU017-019005	Fish weir	453m southwest
DU017-019006	Bridge	553m southwest

As the site is on the RPS all buildings within the curtilage are afforded protection.

The study area also contains several architectural heritage constraints including the below:

Table 5.4: RPS structures within the site boundary

Record of Protected structures within the site boundary			
NIAH Reg No.	RPS Ref	Location	Description
11202003	003	St Edmundsbury, off Lucan Road	Three storey house, Porch with colonnades, & Out offices
11202008		St Edmundsbury, off Lucan Road	Outbuilding
11202007	008	St Edmundsbury, off Lucan Road	Barn and coach house
11202006	012	St Edmundsbury, off Lucan Road	Walled garden
11202005	013	St Edmundsbury, off Lucan Road	Uncoursed rubble limestone wall with attached bell tower

RMPs and Protected Structures are afforded legal protection through their inclusion in the Record of Monuments and Places (RMPs) in accordance with the National Monuments Act 1930-2014; or through their inclusion in the Record of Protected Structures (RPS) in accordance with the Planning

and Development Act 2000 (as amended). Conservation Areas also have non-statutory protection as objectives within Development Plans. The cultural heritage resource within the study area is not limited to these known designated constraints and also includes other potential tangible and intangible assets of significance including, but not limited to the above

While such cultural heritage assets are not afforded protection under current legislation, unless they form a component of an existing RMP, RPS or are included within an existing Architectural Conservation Area (ACA), they are features which can be of very high local importance and, therefore, comprise constraints of cultural heritage merit.

5.9.2 Potential Impacts

The construction phase will have the potential to result in direct negative impacts on cultural heritage constraints, including sub-surface archaeological remains and above ground structures of architectural heritage significance. These potential construction phase impacts on archaeology may arise during ground reduction works undertaken during elements of the proposed development including but not limited to site investigations, enabling works, excavation including services, drainage and hard and soft landscaping.

The design phase should allow to negate any possible impacts when in full operation however, there are always factors unforeseen and these will be addressed when the challenges are presented. It is anticipated that issues of archaeological and cultural heritage interest will have been resolved during the design phase and prior to or during the construction phase.

5.9.3 Assessment Methodology

The cultural heritage assessment will require a comprehensive policy, plan and guideline review, including (but not limited to) the documents listed in Section 2, and:

- National Monuments Act 1930 (as amended)
- Planning and Development Act 2000 (as amended)
- Frameworks and Principles for the Protection of the Archaeological Heritage, Department of Arts, Heritage, Gaeltacht and Islands (DAHGI) 1999
- Land Contamination and Archaeology Good Practice Guidance, Historic England 2017
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, International Council on Monuments and Sites, (ICOMOS) 2011
- Heritage Acts 1995 (as amended).
- Architectural heritage protection – guidelines for planning authorities

The assessment of the proposed scheme will include a comprehensive consideration of the potential direct, indirect, residual and cumulative impacts and will include, where applicable, an assessment of visual impacts on cultural heritage constraints.

The assessment will be based on a combination of

- desk-based research,
- site inspections and
- the results of non-invasive and invasive archaeological investigations the strategy for which will be agreed in consultation with the Minister for HLGH via the National Monuments Service of DHLGH.

These studies will be undertaken to identify known and previously unrecorded features of archaeological, architectural, or cultural heritage significance which may be potentially impacted by the proposed scheme. The programme of desktop research will entail systematic reviews of available and relevant documentary sources which will include, but not be limited to, the following:

- Record of Monuments and Places (RMP) and Sites and Monuments Record (SMR)
- National Inventory of Architectural Heritage (NIAH)
- Topographical files of the National Museum of Ireland
- Cartographic and written sources relating to the study area
- South Dublin County Development Plan 2022-2028

- Reference material including (journals, papers, books etc.) held by the National Library of Ireland, local libraries and/or on-line search facilities/collections (e.g., excavations.ie; archaeology.ie; heritage maps.ie; JSTOR etc.)
- Aerial imagery
- Record of Protected Structures.
- Dublin City Industrial Heritage Record.
- Dublin County Heritage Webmap
- National Inventory of Architectural Heritage: Building and Garden Surveys.
- Irish Architectural Archive.
- Geological Survey of Ireland industrial heritage database; and
- Relevant ACA documentation.
- Local libraries and other historic documents.

A preliminary site inspection will be carried out to assess the potential for the presence of subsurface archaeological remains and will include a written, photographic and drawn record as required. Other on-site investigations required during the design and assessment processes may include geophysical surveys and targeted archaeological test excavations that may be deemed necessary.

An ongoing process of consultation with the wider Project Team, including designers, landscape/visual will be maintained to ensure that cultural heritage considerations form part of the design and assessment phases.

Any invasive surveys for other disciplines e.g., GI or utility slit trenches, will also be reviewed for their potential to result in archaeological impacts. This review will also assess the need for, and scope of, archaeological monitoring of such surveys and the results of any required monitoring will inform the EIA chapter.

5.9.4 Summary

Where required, mitigation measures will be provided to avoid or minimise construction and operational phase impacts on identified constraints. This will include a process of consultation with other disciplines to ensure that the potential for interaction with other mitigation measures has been scoped and assessed. These may include, but not be limited to, mitigation measures for other disciplines in relation to landscape, invasive species and utilities.

While the development of detailed mitigation measures will be formulated during the design, assessment, and consultation processes, they may include the following examples:

- Preservation by avoidance (design phase)
- Archaeological monitoring of geotechnical investigations, utility slit trenches and construction phase ground works
- Potential preservation by record (archaeological excavation)

All elements of the built heritage will be properly recorded, and conservation best practice will prevail – all materials will be repaired where possible with minimal interventions and where repairs and/or replacements are inserted materials will be carefully selected to be a perfect match.

5.10 Landscape and Visual Amenity

5.10.1 Receiving Environment and Sensitive Receptors

Landscape Character -- The proposed development sits within the Liffey Valley Landscape Character Area (LCA). The area has a distinct sense of place, defined by the River Liffey and its valley, and the ecological corridor along it. The LCA is particularly at risk from urbanisation which threatens this sense of place and ecology. The woodland at St Edmundsbury is part of the riparian corridor of the river, and contributes significantly to the landscape character. The LCA is defined as having a Medium to High Landscape Value.

The Liffey Valley is also subject to a Special Amenity Area Order (SAAO), part of which is inside the proposed development boundary.

It is an objective of the CDP to restrict development within this area and to ensure that new development is designed to minimise visual impacts and enhances the County's green

infrastructure. A separate objective of the CDP states that non-residential development will only be permitted in this area where it:

- comprises the redevelopment of or extensions to existing commercial or civic uses or development of new commercial or civic uses within an existing established area of commercial or civic activity; and
- preserves the amenity value of the river valley including its biodiversity value, its landscape value, and views or vistas of the river valley.

Visual Amenity - Residences in the area enjoy views over the woodland and open space south of St Edmundsbury House, while there are views over the proposed development site from public rights of way. There are no designated protected views which could be impacted by the proposed development.

5.10.2 Potential Impacts

During the construction phase, landscape character and visual amenity could be affected by the presence of cranes, construction compounds, and lighting, site offices and hoarding. The recreational amenity of the open space areas will also be affected during the construction of the scheme, particularly on the public rights of way through the site.

Operation stage impacts on visual amenity are possible for residential receptors in the area. Impacts on landscape are also possible once the development is operational, as the development could change the character of the Liffey Valley and its surrounding woodland.

5.10.3 Assessment Methodology

The landscape and visual amenity chapter will examine the potential effects of the proposed development on views from residential properties and nearby open spaces, in terms of visual intrusion and visual obstruction and the impact on landscape character areas from the permanent physical changes to the site brought about by the development.

The Landscape and Visual Impact Assessment in the EIAR will involve consideration of aerial photography, emerging design drawings, relevant various publications and reports, together with visits to the site and environs of the proposed development. The Assessment will be carried out in accordance with:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA)¹ as published by the Landscape Institute (UK) and the Institute of Environmental Management and Assessment (3rd Edition, 2013); and
- Draft Landscape Character Assessment (LCA) of South Dublin County (Draft Report May 2021), appendix 9 of the South Dublin County Development Plan 2022-2028.

Photomontages will be prepared, and liaison with the Conservation Architect will take place to agree on the likely impact and possible mitigation measures for protected architectural features.

5.10.4 Summary

Impacts on landscape and visual amenity are likely to occur both during construction and operation and have the potential to be significant if not properly managed or mitigated. These aspects will need to be considered further in the EIAR.

5.11 Interactions

Potential impacts that may arise as a result of relationships between sensitive receptors within and outside of the site will be addressed in the EIAR and AA Screening/NIS, particularly those on ecological receptors due to the proximity of the woodland and pNHA to the proposed works. Guidance for the assessment of indirect and cumulative impacts, as well as impact interactions will be taken from the European Commission document: Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (Walker and Johnston 1999) and Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland (CIEEM 2016 and 2006).

¹ Landscape Institute and Institute of Environmental Management & Assessment, 2013 *Guidelines for Landscape and Visual Impact Assessment 3rd Edition*. Routledge

5.12 Cumulative Impacts

The cumulative impacts of the proposed development together with other existing and proposed projects will be addressed in the EIAR. The proposed projects that will be considered will be compiled at the time of the EIAR. However, a summary of available recent planning applications at the time of writing of the EIAR Scoping Report on adjoining lands is shown below. These largely relate to applications associated with the adjoining St. Andrew's National School and the Canon Despard Centre, and proposed residential development applications to the south of Lucan Road, near the site access.

It is expected that this list of developments will be updated during the EIAR.

Table 5.5: Recent planning applications in the vicinity of the proposed development. This list will be updated extensively during the EIAR

Application Reg. Ref	Applicant	Development Proposal Summary	Decision
SD22A/0324 ABP Reg. Ref. ABP-314994-22	Frances Dowling	Demolition of an existing house; Ancillary outbuildings and the construction of 1no. two to four storey building accommodating 19no. apartments comprised of 6 one bedroom apartments and 13no. two bedroom apartments; Vehicular access to the proposed development will be via Lucan Road with traffic calming measures onto Lucan Road; 11no. car parking spaces and 20no. bicycle parking spaces and ancillary services including a detached water storage tank and bin store housing all on a site of 0.1925 Ha	Notification of Refusal of Permission on 03/10/22 subject to 1 no. planning condition (proximity to junction on R835 deemed to be a traffic hazard) Appealed to ABP on 01/11/22 Grant permission on 18/11/2024 subject to 19 no. planning conditions
SD21A/0245	The Select Vestry, Leixlip Union of Parishes	Retention of 2 no. prefabs as childcare facilities within the curtilage of a Protected Structure 025 - James MacCarten slab 1807 within a National Heritage Area adjoining Liffey Valley	Grant Permission on 09/02/22 subject to 10 no. planning conditions
SD20A/0142 ABP Reg. Ref. ABP-309525-21	Frances Dowling	Demolition of an existing house, Hillhouse, Lucan Road and ancillary outbuildings and the construction of one 4 storey building accommodating 20 apartments comprised of 5 no. one bedroom apartments and 15no. two-bedroom apartments. Vehicular access to the proposed development will be via Lucan Road and Lucan Heights with 13no. car parking spaces and 12no. bicycle parking spaces and ancillary services including a detached water storage tank and bin store housing all on a site of 0.1925Ha	Notification of Grant of Permission on 28/01/21 3rd Party Appeal to ABP on 24/02/21 and subsequently refused permission on 22/12/21
SD16A/0072/EP	Board of Management, St. Andrew's	(1) Demolition of existing single and two storey post primary school buildings (1050sq.m) to the east of the main	Grant Extension of Duration 26/07/21 subject

	National School	<p>school buildings. (2) Construction of a part two, part three storey post primary school extension (3346sq.m in total) configured as follows; (a) three storey extension (1817sq.m) north of main school building along the Lucan Road forming a new post primary school pedestrian entrance off the Lucan Road, (b) two storey extension (1340sq.m) to the east of main school buildings, (c) two storey extension (escape stairs 55sq.m) to the south of main school buildings on the west side of the two storey classroom block, (d) single storey extension (133sq.m) at first floor north of the existing PE hall. (3) Reconfiguration of the existing vehicular and pedestrian access off Lucan Heights to form the main post primary school vehicular entrance and secondary pedestrian entrance. (4) The reconfiguration of the existing primary school pedestrian entrance in its current location off the Lucan Road and the redesignation of the existing post primary school vehicular entrance as the primary school vehicular entrance. (5) All associated site works</p>	to 2 no. planning conditions
SD21A/0020	Presentation Sisters	Removal of portion of existing boundary wall to front and construction of new vehicular and pedestrian entrances	Grant Permission on 12/08/21 subject to 8 no. planning conditions
SD20A/0333	Presentation Sisters	<p>Subdivision of existing bedrooms and the formation of openings in partition walls to form a total of 5no. ensuite bedrooms on ground floor level and 11no. ensuite bedrooms and one bedroom on first floor level to include associated new foul drainage and the removal of existing first floor ensuite structure to rear, ; demolition of existing single storey 20th century laundry/stores extensions to side; construction of new single storey kitchen and stores; demolition of existing porch and reconstruction of new porch in kitchen yard; the removal of existing bathrooms on ground and first floor over to accommodate the installation of a lift; change of use of existing chapel for use as mission office and associated works</p>	Grant Permission on 31/05/21 subject to 12 no. planning conditions
SD19A/0198	Frances Dowling	Demolition of existing house and ancillary outbuildings and the construction of 1 four storey building accommodating 21 no. apartments comprised of 6 no. one bedroom apartments and 15 no. two bedroom	Refuse Permission subject to 4 planning conditions

		apartments; vehicular access to the proposed development will be via Lucan Road with 13no. car parking spaces and 12no. bicycle parking spaces and ancillary services all on a site of 0.1925 Ha	
SD18A/0132	The Select Vestry of Leixlip Union COI	Retention of change of use of existing single storey national school building premises from education to childcare facilities in classrooms and to recreational facility for mixed use in general purpose hall. Retention of 2no. pre-fabs – Prefab No. 1 (southwest of site) to be retained as recreational facilities for mixed use, Prefab No. 2 (northeast of site) to be retained as childcare facility. Retention of boiler house extension. Retention of secure play area to north classrooms. Proposed signage and logo at east gable (at entrance) titled Canon Despard Centre within a curtilage that includes Protected Structure 025, James MacCarten memorial slab 1807 within a natural heritage area adjoining Liffey Valley	Grant Permission for Retention subject to 7 no. planning conditions
SD22A/0390 ABP Reg. Ref. ABP-318412	Nacul Developments Ltd.	Demolition of house and associated outbuildings; construction of 7 houses and all associated site development works including car parking, open spaces and landscaping.	Grant permission on 27/08/2024 with revised conditions
FW24A/0145E ABP Reg. Ref. ABP-319993	Steven McEleney	Retention of concrete yard and construction of surface water drainage infrastructure and a soak pit with all associated site works	Notification of Refusal of Permission on 01/11/24 subject to 1 no. planning condition (zoning objective of land 'high amenity')
FW24A/0306E ABP Reg. Ref ABP-321008	Steven McEleney	Retention of agricultural entrance with all associated site works.	Awaiting decision (due to be decided 19/02/2025)
SD23A/0292 ABP Reg. Ref. ABP-320513-24	Esker Lawn Cemetery Limited	The construction of a new 485 m2 crematorium within the grounds of Esker Lawn Cemetery consisting of a congregation space, 1 no. electric cremator and associated plant and services spaces, and the provision of visitor toilets, and ESB substation; provision of new car parking area and minor adjustments to existing parking resulting in the net addition of 2 parking spaces; amendments to existing site landscaping involving removal and reduction of existing hard surfaces and roadway surfaces and all associated	Grant permission on 08/08/2024 subject to 17 no. planning conditions

		works; the construction of new landscaping works including a contemplation pond, water feature, planted landscape berms and swale drains at the building perimeter and at the adjacent area designated for grave spaces under SD10A/0331 as part of a combined suds drainage and biodiverse planting strategy; temporary access for construction traffic to be provided from the eastern boundary, and the existing boundary treatment reinstated post construction.	
SD24A/0198	Canon Despard Centre	Permission for the removal of existing prefabricated structure on site with replacement permanent detached two storey/domer structure located to the north-east of the site for mixed flexible community uses (such as childcare/creche/playschool/community uses) and all associated site works. The development is within the curtilage of a site that includes protected structure 025, James Mc Carten memorial slab 1807 and within a natural heritage area adjoining the Liffey valley.	Awaiting decision (due to be decided 27/01/2025)
ABP Reg. Ref. ABP-314942	National Transport Authority	BusConnects Lucan to City Centre Core Bus Corridor Scheme	Grant permission on 29/08/2024 subject to 18 no. planning conditions

6 Conclusions

Table 6.1 summarises the findings of the initial scoping exercise. It was decided that there are likely significant impacts for the environmental factors shown, and the EIAR will assess these aspects.

Table 6.1: Summary of the scoping assessment findings

Environmental Topic	Construction Phase	Operational Phase
Population and Human Health	x	
Biodiversity	x	x
Land and Soil	x	
Water	x	x
Air and Climate	x	
Noise	x	
Material Assets	x	
Cultural Heritage	x	x
Landscape and Visual Amenity	x	x
Interactions	x	x
Cumulative impacts	x	x

A specific Construction Impacts chapter will be included in the EIAR. This Chapter will assess the potential for impacts during construction on Population and Human Health, Land and Soil, Air and Climate, Noise, and Material Assets (Impacts on traffic will be reported separately in a Traffic Impact Assessment (TIA) and summarised within the Material Assets Chapter of the EIAR). Significant impacts are not likely during operation in these topics.

This Scoping Report is intended to outline key issues to be addressed in the preparation of the EIAR and Appropriate Assessment (AA) Screening for the proposed development. Consultation with the public, statutory organisations, and non-statutory organisations is being undertaken, based on this document, to ensure input from all interested parties from the earliest stages of the EIAR preparation.

The completed EIAR and Appropriate Assessment (AA) Screening will be submitted to An Coimisiún Pleanála as part of the formal planning application process.

Appendices

A Consultation List

(Responses to consultation will be summarised in the EIAR)

South Dublin County Council

- Heritage Officer
- Biodiversity Officer
- Parks Department
- Planning Department
- Roads and Traffic Department
- Environment Department
- Water Drainage Department

Government Departments

- Department of Agriculture, Food, and Marine
- Department of Communications, Climate Action, and Environment
- Department of Housing, Planning, and Local Government
- Department of Transport, Tourism, and Sport

Other Consultees

- Environmental Protection Agency
- Geological Survey Ireland
- Inland Fisheries Ireland
- National Monuments Service
- National Parks and Wildlife Service
- Office of Emergency Planning
- OPW
- Failte Ireland
- Transport Infrastructure Ireland
- Irish Water
- Health Service Executive (HSE)
- An Taisce - The National Trust for Ireland
- Bat Conservation Ireland
- Birdwatch Ireland
- Coillte
- Irish Heritage Trust
- Irish Wildlife Trust
- Teagasc
- The Heritage Council
- Eastern & Midlands Regional Assembly
- Local Authority Waters Programme (LAWPRO)
- Irish Environmental Network
- Sustainable Water Network Ireland (SWAN)
- Dublin Urban Rivers LIFE
- Dublin Fire Brigade

B Consultation Scoping Responses

B.1 Geological Survey Ireland



Bernadette O'Connell
Unit 8, Block 660
Greenogue Business Plaza
Greenogue Business Park
Rathcoole, D24 YN81

12 June 2023

Re: EIAR Scoping Report for St Patrick's Mental Health Services at Saint Edmundsbury

Your Ref: n/a
Our Ref: 23/134

Dear Bernadette,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your letter/email received on the 26 May 2023, concerning the EIAR Scoping Report for St Patrick's Mental Health Services at Saint Edmundsbury, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for South Dublin was completed in 2014. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed development.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.



The Groundwater Data Viewer indicates two aquifers classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' underlie the proposed development.

The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.

Further information on the bedrock and Quaternary 3D models of Dublin is available [here](#) and [here](#).

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).



We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments for Dublin Region

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. **This page also hosts urban geochemistry mapping (Dublin SURGE project) which may be useful to the project.**

Geological Survey Ireland has completed a geochemical characterization of the subsoil beneath large parts of Dublin, known colloquially as the Dublin Boulder Clay. The report documents the analysis completed on a third-party geochemical dataset obtained from the private sector and is accompanied by an excel spreadsheet containing the database of geochemical observations. Further details can be found at: <https://www.gsi.ie/en-ie/publications/Pages/Geochemical-characterization-of-the-Dublin-Boulder-Clay.aspx>

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geological Survey Ireland

Trish Smullen
Geoheritage and Planning Programme
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

B.2 Inland Fisheries Ireland



**Iascach Intíre Éireann
Inland Fisheries Ireland**

21/06/2023

RE: EIAR Scoping Report for St Patrick's Mental Health Services at Saint Edmundsbury

To whom it may concern

The following observations and comments are of necessity of a general nature, as construction proposals and method statements are not as yet available. While they apply to the proposed development in general, the waters in fisheries terms likely to be impacted act primarily as contributories to downstream habitat for juvenile salmonids, lampreys and other species. They also, in the context of the proposed works, have the potential to convey deleterious matter from those works such as concrete, silt, fuel, lubricating and hydraulic oils from construction plant and equipment downstream unless proper safeguards are in place. IFI request you have particular regard to the following in the proposed development:

The Liffey system is exceptional in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) in addition to resident Brown trout (both *Salmo trutta*) populations. The Liffey River also supports populations of the Freshwater Crayfish (*Austropotamobius pallipes*) and Lamprey (*Lampetra* sp.) species listed under Annex II of the EU Habitats Directive. The Liffey estuary serves as the natural linkage for species such as Salmon, Sea trout and Eels migrating between freshwater and ocean environments, providing the necessary habitat for their transition. Previous surveys in Dublin city area of the Liffey have recorded Eel and river lamprey.

Pollution of the adjacent fresh / estuarine waters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this surface water system. A comprehensive and integrated approach for achieving estuary and river protection during construction and operation should be implemented through environmental construction management planning.

Best practice should be implemented at all times in relation to any activities that may impact on surface water. Any discharges to surface streams present on the site must not impact negatively on the salmonid status of the Liffey system. Comprehensive surface water management measures must be implemented at the construction and operational stage to prevent any pollution.



**Iascach Intíre Éireann
Inland Fisheries Ireland**

It is recommended that the "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016) <http://www.fisheriesireland.ie/fisheries-management-1/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters> should be consulted when planning to undertake works near any of the relevant rivers and streams. The maintenance of habitat integrity (both in-stream and riparian) is essential in safeguarding the ecological value of this important urban natural resource. The specific details of any works directly affecting watercourses or riparian habitats in the area, in particular surface water discharges to streams must first be submitted to IFI directly for assessment.

Pre-construction baseline data (biotic and abiotic) is essential within the EIA process and IFI would be delighted to contribute any information that may be relevant to the fishery section. Potential impacts (likely and significant effects) of the development on the system should be comprehensively assessed and recommendations and mitigation measures should be formulated. The identification of good baseline data across a range of sites, both close to the development and at a distance from the site will allow for comparison between the current situation and that which may develop over time if the project proceeds.

IFI have also published revised "Planning for watercourses in the urban environment" which can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats. This should be referred to in the EIAR. It can be accessed on our website www.fisheriesireland.ie

I trust you will take our observations on board.

Kind regards,

Roisin O' Callaghan

Fisheries Environmental Officer
Inland Fisheries Ireland - Dublin
**Iascach Intíre Éireann
Inland Fisheries Ireland**

Telephone: +353 (0) 1 8842651

EMail: roisin.ocallaghan@fisheriesireland.ie

B.3 Uisce Éireann



For the attention of Conor O'Neill

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
D01 WA07
Éire

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

21st June 2023

By Email: Conor.oneill@jbaconsulting.ie

Re: EIA Scoping Request – Proposed healthcare development within the grounds of St Edmundsbury Hospital in Lucan, South Dublin.

Dear Mr O'Neill,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to a proposal for the provision of a healthcare development within the grounds of the existing St Edmundsbury Hospital in Lucan, South Dublin

Please see below, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and the EIA scoping opinions below should be directed to planning@water.ie

PP. *Ali Robinson*

Yvonne Harris

Connections and Developer Services

Stiúthóirí / Directors: Tony Keohane (Chairman), Niall Gleeson (CEO), Christopher Banks, Fred Barry, Gerard Britchfield, Liz Joyce, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh

Oifig Chláraithe / Registered Office: Teach Colvill, 24–26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24–26 Talbot Street, Dublin 1 D01 NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.

Uimhir Chláraithe in Éirinn / Registered in Ireland No.: 530363

Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.

All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.

- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.

The logo for JBA consulting is a teal-colored rounded square. Inside the square, the letters "JBA" are written in a large, bold, white sans-serif font. Below "JBA", the word "consulting" is written in a smaller, white, lowercase sans-serif font.

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