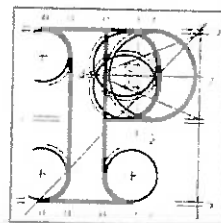


Our Case Number: ACP-324264-26



An
Coimisiún
Pleanála

Department of Housing, Local Government and Heritage
The Manager
Development Applications Unit
Government Offices
Newtown Road
Co. Wexford
Y35 AP90

Date: 24 June 2026

Re: Proposed Development of Mental Health Hospital Facility
St. Edmundsbury Hospital, Lucan Road, Lucan, Co. Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this matter.

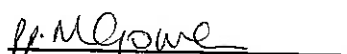
Please be advised that a copy of all submissions / observations received in relation to the application will be made available for inspection on the Commission's website at the following link:
<https://www.pleanala.ie/en-ie/case/324264>.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Commission.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Lauren Griffin
Executive Officer
Direct Line: 01-8737244

PA09

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64 Sráid Maoilbhríde
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64 Marlborough Street
Dublin 1
D01 V902

Muirin Gowen

From: David OConnor (Housing) <David.OConnor@npws.gov.ie>
Sent: Tuesday 23 June 2026 15:47
To: LAPS
Subject: ACP-324264-26 St. Edmundsbury Hospital
Attachments: South Dublin ACP-324264-26.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara

Please find attached Archaeological and Nature Conservation observations/recommendations for the above-mentioned ACP notification.

Kindly forward a copy of your decision to manager.DAU@npws.gov.ie as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.DAU@npws.gov.ie

Kind regards,

David O'Connor
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

—
David.oconnor@npws.gov.ie
Manager.DAU@npws.gov.ie



Your Ref: ACP-324264-26

Our Ref: SID-SD-2026-017

23 June 2026

The Secretary
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

Development proposed new Mental Health Hospital Facility and associated site development, in the grounds of the existing St. Edmundsbury Hospital site in Lucan, Co. Dublin.

PROTECTED STRUCTURE: RPS REF. NOS. 003, 008, 012, 013.

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

Nature Conservation

Having considered the various documents submitted in support of this application, including the Planning Statement, Environmental Impact Assessment Report (EIAR), and Appropriate Assessment (AA) Screening Report, the Department notes that the proposed development relates to a site of circa 8.1 ha within the grounds of the existing St. Edmundsbury Hospital, Lucan, and that the principal element of the proposed development involves the construction of a 200 bed psychiatric hospital. In the current South Dublin County Council Development Plan (CDP) 2022-2028, the St. Edmundsbury Hospital lands have the Zoning Objective 'HA-LV': "To protect and enhance the outstanding character and amenity of the Liffey Valley", and the proposed site is adjacent to, and to a very minor extent overlaps, with the area subject to the Liffey Valley Special Amenity Area Order (SAAO). According to Table 12.13 in



Chapter 12.2 of the CDP a hospital is not permitted on land subject to this zoning objective, but in the CDP's Chapter 3: Natural, Cultural and Built Heritage, one of the Specific Local Objectives (SLOs) set out in relation to Policy NCBH 7 concerning the Liffey River Valley and Special Amenity Area Order is NCBH7 SLO2 :

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

It is proposed to construct the proposed 200 bed hospital on the southern third of the site on land primarily classified during ecological surveys in February, May and September 2023 and June and August 2025 as a mosaic of the Fossitt habitats, GA1 'Improved agricultural grassland' and GS2 'Dry meadows and grassy verges. Much of this area was in the past a kitchen garden and some of the garden's enclosing walls and remnants of farmyard buildings survive on the site and have been classified as the Fossitt habitats BL1 'Stone walls and other stonework' and BL3 'Buildings and artificial surfaces' are also present on the proposed hospital site. At present part of the land classified during the 2023 and 2025 ecological surveys as GA1/GS2 mosaic supports a crop of barley.

The proposed footprint of the hospital at its northern end also encroaches beyond the old kitchen garden walls into a section of the belt of woodland separating the immediate environs/garden of the existing St. Edmundsbury Hospital from the former kitchen garden and farm buildings which is part of the Liffey Valley proposed Natural Heritage Area (pNHA). Altogether the construction of the hospital as proposed will involve the permanent loss of circa 0.15 ha of pNHA woodland. The belt of woodland between the immediate environs of the existing hospital and the former kitchen garden is a mixed deciduous woodland, in which small-leaved lime, sycamore and ash are prominent components, with much cherry laurel and brambles in the shrub layer, and a ground layer containing some species typical of woodland such as ivy broom rape, wood sedge and lords-and-ladies, but also species such as cleavers and nettle more typical of disturbed habitats. From its character and the evidence of historical maps included in the EIAR, this woodland belt originated from landscape planting in the late 18th century with some subsequent tree regeneration/colonisation, mainly by sycamore and ash. It does not represent ancient woodland as found elsewhere on some of the steep escarpment slopes of the Liffey Valley pNHA and which is characterised by the presence of such rare woodland associated species as yellow archangel and toothwort. It



appears to have been included in the NHA as supporting habitat to the woodland immediately to its west developed on a steep slope dropping down to the Liffey which has a ground flora more typical of woodland dominated by wild garlic, and where the protected plant species, hairy St. John's-wort, occurs on its downslope boundary circa 75 m west of the development site. As reported in the EIAR it also helps sustain a breeding bird fauna in the pNHA characteristic of woodland, including such species as long-eared owl, stock dove, blackcap, chiffchaff, spotted flycatcher, tree creeper and tit species.

The EIAR considers that without the implementation of mitigation measures during the construction phase of the proposed development, polluting materials transported in dust and surface water runoff could adversely affect the pNHA woodland, and that the loss of woodland by the time the proposed development becomes operational will result in an "irreversible permanent adverse residual impact of moderate significance" on the habitats, flora and fauna associated with the Liffey Valley pNHA. On the other hand, the actual pNHA woodland area to be encroached on by the development of the hospital exhibits a low tree stocking density and only eleven ash trees are to be removed within the pNHA's boundaries. The EIAR proposes as a measure to mitigate the loss of this part of the pNHA the translocation of turves of soil from the area to be lost together with seeds and saplings to a new area of woodland to be established to the east of the existing area of woodland within the development site on an area at present occupied by grassland, and the use of turves from the latter area to establish green roofs to be incorporated into the landscaping of the new hospital.

Other measures are also proposed in the EIAR to mitigate the possible effects of the proposed development on biodiversity, including managing runoff and dust generated during the development's construction phase, and minimising light pollution during both its construction and operational phases. As well it is intended to implement various biodiversity enhancement measures such as the installation of bat boxes and incorporation of swift bricks and nest boxes/sites suitable for house martins and swallows into the design of the hospital. These measures should compensate to some extent for the loss of nesting sites for several bird species because of the proposed removal of the remains of old farm buildings from the hospital site.

Overall, however, even with the implementation of these mitigation and biodiversity enhancement measures, because of the loss of the area identified in the EIAR as Improved agricultural grassland/ Dry meadow and grassy verges mosaic (now converted to arable) under the footprint of the hospital, the proposed development will likely lead to a net loss of biodiversity. While these habitats are of limited floristic value, they contribute significantly to the area of the St. Edmundsbury lands available to be foraged on or over by bird species,



and bat and other mammal species present in the area. Particularly for predatory bird species, such as long-eared owl, barn owl and buzzard recorded at St. Edmundsbury, the land-take for the hospital will lead to the loss of important foraging habitat and is likely to result in a reduction of these species' usage of/ or their numbers in the St. Edmundsbury area. The loss of suitable foraging habitat for other bird species will also similarly likely reduce the numbers of bird species and numbers of individual birds in St. Edmundsbury lands.

In evaluating the appropriateness of permitting the construction of the psychiatric hospital and other development works proposed for the St. Edmundsbury lands, it is recommended that An Coimisiún Pleanála should take account of the potential adverse effects of the development proposed on the fauna, flora and ecologically significant habitats present on these and adjacent lands, including in the Liffey Valley pNHA outlined above. If An Coimisiún decides to grant permission for the development proposed, it is recommended that the following conditions should be attached to the permission granted:

1. That details of the various measures set out in the EIAR submitted in support of the present application to mitigate the proposed development's potential effects on biodiversity during the construction phase should be included in a Construction Environmental Management Plan (CEMP) to be submitted for the written agreement of the planning authority before the commencement of development works on site, the CEMP to include timelines and a program for the implementation of these mitigation measures and to be implemented in full.

Reason: To minimise the potential adverse effects of the proposed development on animal and plant species and habitats of conservation importance occurring on the St. Edmundsbury lands and adjacent areas, including the Liffey Valley pNHA, during the development's construction phase.

2. That a Nature Conservation Plan should be drawn up for the St. Edmundsbury site and submitted for the written agreement of the planning authority before the commencement of site development works, this plan to include the locations within the proposed development where the various biodiversity enhancement measures outlined in the EIAR, such as the provision of swift bricks, bird nesting boxes, bat boxes and bat friendly lighting, are to be undertaken, and a program for their implementation and the monitoring of their success.

Reason: To provide nesting sites for bird species of conservation significance, including swift, house martin and swallow, and roosting sites for bat species subject to a system of strict protection under the Habitats Directive (92/43/EEC), to help maintain these species' presence on the St. Edmundsbury lands into the future.



Archaeology

It is noted that the EIAR submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by ACAS (EIAR Chapter 10; date April 2026). The Department notes that the EIAR was informed by a programme of Archaeological Monitoring of Site Investigations as well as a walkover survey. The National Monuments Service (NMS), Department of Housing, Local Government and Heritage have reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

The Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C4, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 10 of the EIAR (date April 2026) shall be implemented in full, except as may otherwise be required to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works; topsoil stripping or groundworks associated with the development.
 - a. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.
 - b. Should archaeological remains be identified during archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service, regarding appropriate mitigation.
 - c. The developer shall facilitate the archaeologist in recording any remains identified.
 - d. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.
3. The Construction Environment Management Plan (CEMP) shall include the location of all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 10 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed



to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.

4. The planning authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.DAU@npws.gov.ie, where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

David O'Connor
Development Applications Unit
Administration