

Comhairle Chontae Atha Cliath Theas

PR/1533/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD21A/0273 **Application Date:** 05-Oct-2021
Submission Type: New Application **Registration Date:** 05-Oct-2021

Correspondence Name and Address: Moloney O'Beirne Architects Oyster Point, Temple Road, Blackrock, Co. Dublin

Proposed Development: Demolition of single storey derelict hospital building known as St Annes & St Brendans unit and associated boiler room.

Location: St. Annes and St. Brendans Unit, Peamount Hospital, Newcastle, Co. Dublin

Applicant Name: Peamount Healthcare

Application Type: Permission

(SW)

Description of Site and Surroundings

Site Area: stated as 0.7093 Hectares on the application.

Site Visit: 1 November 2021

Site Description

The subject site is to the rear of Peamount Hospital, off Newcastle Road. Hospital buildings lie to the east and south, open space lies to the west and north (these lands are zoned EE). The land is generally flat.

Proposal

Permission is being sought for:

- **Demolition** of single storey derelict hospital building known as St Annes & St Brendans unit and associated boiler room.

Zoning

The subject site is subject to zoning objective 'RU': *'To protect and improve rural amenity and to provide for the development of agriculture'*.

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Consultations

Waste Management:	No report received at time of writing.
Water Services:	No objections, subject to conditions
Roads:	No report received at time of writing.
Parks:	Additional Information (Condition supplied)
Heritage Officer:	Additional Information
Architectural Conservation Officer:	Additional Information
EHO:	No objections, subject to conditions.

SEA Sensitivity Screening – overlap with Rural 2016 layer indicated.

There are a number of Protected Structures within the grounds of Peamount Hospital, outside the redline.

Submissions/Observations /Representations

None.

Relevant Planning History

Subject site

None.

Wider Hospital Complex

SD18A/0333 Alterations to previously granted permission (SD16A/0019) for a 2 storey healthcare unit comprising of accommodation for 100 people; ancillary healthcare services; catering; staff facilities; associated site works; access roads; landscaping; an internal link to the existing Rehabilitation Unit; together with redistribution of existing car parking spaces and the demolition of a disused building; such alterations to include reconfiguration of the proposed car park (and drainage of same) and the removal of a total of 34 first floor balconies from the proposed development. The proposed works are located on the site of Protected Structures. **Permission Granted**

SD17A/0086 The construction of a single storey accessible toilet extension to the existing southeast elevation of St. Brid's unit which is located within the curtilage of a Protected Structure and includes associated site works.

SD16A/0019 Construction of a new 2 storey healthcare unit comprising of accommodation for 100 people, ancillary healthcare services, catering, pharmacy and staff facilities, associated site works, access road, landscaping, an internal link to the existing rehabilitation unit, together with

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redistribution of the existing car parking spaces and the demolition of a disused building. The proposed works are located on the site of a Protected Structure. **Permission Granted**

SD06A/0323 Proposed new external disability ramp to right hand side of main entrance, new internal wheelchair lift and stairway from ground floor to second floor level to administration building. (This is a Protected Structure). **Permission Granted**

SD05A/0785 Single storey rehabilitation unit between St. Ita's Pavilion and St. Teresa's Pavilion and new single storey nurses station extension to St. Teresa's Pavilion. The proposed building is located on the site of protected structures. **Permission Granted**

SD04A/0335 Single storey extension to existing Day Care Activation Centre consisting of 8 no. Activity Base Rooms, Conservatory, Oratory and associated ancillary facilities. **Permission Granted**

S01A/0784 Retention of temporary medical records building. **Permission Granted**

S99A/0639 2 single storey extensions at St. Brigs Ward. **Permission Granted**

Other sites

SD188/0009 Grange Castle West Access Road in the townlands of Brownstown, Clutterland, Loughtown Upper and Milltown... **Part 8 approved**

Relevant Enforcement History

None recorded for subject site according to APAS.

Pre-Planning Consultation

None recorded for subject site according to APAS.

Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

Chapter 3 – Community Infrastructure

Policy C11 Healthcare Facilities

Policy C11a It is the policy of the Council to support the Health Service Executive (HSE) and other statutory and voluntary agencies in the provision of appropriate healthcare facilities, including the system of hospital care and the provision of community based primary care facilities.

Policy C11b It is the policy of the Council to support and encourage the integration of healthcare facilities within new and existing communities that are appropriate to the size and scale of each settlement

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C11 SLO 1: To support and facilitate the appropriate future development of Peamount Healthcare for rehabilitation and continuing care facilities.

Chapter 9 Heritage, Conservation and Landscapes

Policy HCL3 Protected Structures

Policy HCL7 Landscapes

Policy HCL15 Non-Designated Areas

Chapter 7 Infrastructure and Environmental Quality

Policy IE 1 Water & Wastewater

Policy IE 2 Surface Water & Groundwater

Policy IE 3 Flood Risk

Policy IE Waste Management

Policy IE 7 Environmental Quality

Chapter 11 Implementation

Section 11.6.0 Infrastructure and Environmental Quality

Section 11.6.5 Waste Management

(iv) Construction and Demolition Waste

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

Relevant Government Guidelines

Project Ireland 2040 National Planning Framework, Government of Ireland, (2018).

Regional Spatial & Economic Strategy 2019 - 2031, Eastern & Midlands Regional Assembly, (2019).

Eastern Midlands Region Waste Management Plan 2015 – 2021, Eastern Midlands Waste Regional Office, (2015).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).

Assessment

The main issues for assessment relate to:

- Zoning and Council Policy;
- Visual Amenity;
- Services and Drainage;
- Environmental Impact Assessment; and
- Appropriate Assessment.

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Zoning and Council Policy

The site is zoned 'RU' '*To protect and improve rural amenity and to provide for the development of agriculture*'. Hospitals are not generally permitted within this zoning objective. However, the site in question is subject to a specific local objective:

C11 SLO 1: To support and facilitate the appropriate future development of Peamount Healthcare for rehabilitation and continuing care facilities.

The applicant has not provided any justification within their application as to how this proposal would meet the zoning objective. In addition to this, no rationale has been given for the need for the demolition, or what would happen to the land post demolition.

The applicant is therefore requested to provide the following information **via additional information**:

- Details of how the proposal meets the SLO *To support and facilitate the appropriate future development of Peamount Healthcare for rehabilitation and continuing care facilities.*
- Details of the need for the structures to be demolished
- Details of any future proposals for the land, as well as a timeframe for any future development.

Visual Amenity

The buildings proposed for demolition involve a single storey derelict hospital building, as well as the associated boiler house.

The applicant has stated that the buildings are derelict and it is apparent that this is the case. The removal of the structures therefore has the potential to have a positive impact on visual amenity. The removal could improve the appearance of the hospital and, whilst no development has taken place on lands to the north and west to date, the land is zoned 'EE' and the removal of the derelict buildings could also have a positive impact in terms of views from these lands.

However, the applicant has not provided any details of what would be in place on site following the demolition.

The applicant has not stated that the proposal would retain existing hardstanding or if supplementary planting would take place. This should also be addressed via **additional information**.

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Protected Structure

The structure to be demolished is located within the curtilage of a Protected Structure. It is noted that the applicant has not indicated this on the site notice. The applicant is, therefore, requested to provide, via **significant additional information**, revised site notices and newspaper notices indicating that the site is within the curtilage of the protected structure.

The Architectural Conservation Officer in a report emailed 25/11/21, has stated...

“Apart from survey drawings of the existing there is no other information provided. There is a cover letter from the architects but no details or reference to the existing buildings and why demolition is being proposed.

And has recommended the following additional information be sought:

- 1. a photographic record providing full images of the existing units proposed for demolition*
- 2. A rationale/justification for the demolition of these buildings with regard to justifying demolition within the curtilage of a Protected Structure*
- 3. A rationale/justification with regard to the embedded carbon and the potential reuse rather than demolition of these buildings.*

The Architectural Conservation Officer further states that ‘*Unless there is a justified and proper reason provided for demolition any such proposals will not be deemed acceptable. Although these buildings are not individually listed on the RPS they are located within the curtilage and are part of the wider complex of Peamount Hospital therefore full details should be provided in order to allow a full and proper assessment of the proposal.*’

Additional Information is therefore recommended.

Services and Drainage

In relation to surface water and flood risk, Water Services states no objections, subject to conditions.

Waste Management

No report has been received from the SDCC Waste Management section at the time this report was written.

In accordance with Section 11.6.5(iv)

“Construction and demolition waste management plans should be submitted as part of development proposals for projects in excess of any of the following thresholds:

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- *New residential development of 10 units or more,*
- *New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,000 sq metres,*
- *Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of construction and demolition waste, and*
- *Civil engineering projects in excess of 500 cubic metres of waste materials used for development works on the site.*

A Construction and Demolition Waste Management Plan, as a minimum, should include provision for the management of all construction and demolition waste arising on site, and make provision for the re-use of said material and/or the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, excavated material from development sites should be re-used on the subject site”.

The applicant is requested to confirm via **additional information**, whether they meet the above threshold. If so, the appropriate waste management plan should be provided.

Landscape and Ecology

The Parks and Public Realm Section has assessed the proposed development in accordance with the County Development Plan and has stated that the main concerns are:

- *Potential Impact of the proposed development on existing trees, hedgerows and local biodiversity including lack of suitable mitigation or compensation measures*
- *Potential impacts on bats (foraging routes)*

The Heritage Officer, in an email received 25/11/21, states that the landscape in this area of the county is identified as supporting the right habitat types for most Irish bat species and requests that a survey to identify the presence of a roost or to identify the potential for a roost to be present can be undertaken over the winter months, (an experienced bat expert will know the evidence to look for in determining whether the buildings are used as a roost by local bats). A bat activity survey can also be undertaken as early as April, depending on weather conditions in spring, *i.e.* a milder spring will bring bats out of hibernation earlier. This could happen within the timeframe of the Additional Information.

Given the scale of the proposal and its location, it is considered that a survey to identify the presence of a roost or to identify the potential for a roost to be present should be carried out.

The Heritage Officer also states that given the surrounding ‘bat landscape’, outdoor lighting could be an issue and requests the retention/enhancement of existing or new planting to screen lighting from the wider landscape should be explored and proposals submitted. It is considered that in the event of a grant of permission, no additional lighting shall be included.

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Screening for Environmental Impact Assessment

Having regard to the nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Screening for Appropriate Assessment

The applicant has not provided information to assist the screening for Appropriate Assessment. Having regard to the nature of the development, connection to public services and the distance from the Natura 2000 sites the proposed development would not require a Stage 2 Appropriate Assessment.

Conclusion

Having regard to the:

- provisions of the South Dublin County Development Plan 2016-2022,
- the site located within the curtilage of a protected structure
- the established character of the area, and
- the nature and scale of the proposed development,

it is considered that **Additional Information** is required to ensure the proposed development would be in compliance with Council policy, would not seriously injure the amenities of the area or of property in the vicinity, and would, therefore, be in accordance with the proper planning and sustainable development of the area.

Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. (A) The structure to be demolished is located within the curtilage of a Protected Structure. It is noted that the applicant has not indicated this on the site notice. The applicant is, therefore, requested to provide, via significant additional information, revised site notices and newspaper notices indicating that the site is within the curtilage of the protected structure.
(B) The Architectural Conservation Officer has raised concerns regarding the lack of information submitted to facilitate a full assessment to be carried out. The applicant is requested to submit the following:
 - (i) A photographic record providing full images of the existing units proposed for demolition.
 - (ii) A rationale/justification for the demolition of these buildings with regard to justifying demolition within the curtilage of a Protected Structure.

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(iii) A rationale/justification with regard to the embedded carbon and the potential reuse rather than demolition of these buildings.

The applicant should note, that although these buildings are not individually listed on the RPS they are located within the curtilage of one and are part of the wider complex of Peamount Hospital therefore full details should be provided.

2. (A) The Peamount Hospital Site is supported by SLO C11-1 'To support and facilitate the appropriate future development of Peamount Healthcare for rehabilitation and continuing care facilities'. The Planning Authority request that the applicant submit a rationale and justification for the demolition of the structure and indicate how it complies with the sentiment of the SLO to facilitate continuing care at this location. This should include:
 - (i) Details of the need for the structures to be demolished.
 - (ii) Details of any future proposals for the land,
 - (iii) Timeframe for any future development.(B) The Planning Authority has concerns in relation to the lack of clarity about the use/condition of the site after the demolition. The applicant has not stated that the proposal would retain existing hardstanding or if supplementary planting would take place. The applicant is requested to provide details of planting (temporary or permanent) for the site (In the instance that there are no proposals to redevelop the site in the short term - if it is proposed to redevelop the site then details should be provided in accordance with Item A.)
3. In accordance with Section 11.6.5(iv) of the County Development Plan, 'Construction and demolition waste management plans should be submitted as part of development proposals for projects in excess of any of the following thresholds:
 - Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of construction and demolition waste, andA Construction and Demolition Waste Management Plan, as a minimum, should include provision for the management of all construction and demolition waste arising on site, and make provision for the re-use of said material and/or the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, excavated material from development sites should be re-used on the subject site'.

The applicant is requested to confirm, whether the proposal meets the above threshold. If so, the appropriate waste management plan should be provided. (Refer also to Item 1 of this Additional Information Request).
4. The Planning Department has concerns regarding the impact of the proposed development on existing trees and hedgerows. The applicant has not provided any information indicating the impacts on these features as part of the application.
 - (i) The applicant is requested to provide a detailed tree survey of the site comprising a plan and schedule indicating the precise location, species, spread, height and condition of each tree accurately plotted and showing those trees to be retained and those to be felled with a reason for felling

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(ii) The applicant is requested to provide an Arboricultural Impact Assessment (AIA) which should provide information to show how trees/hedging worthy of retention would be sustainable and justification and mitigation measures for any tree removal proposed. The AIA shall identify areas to be excluded from any form of development, specify protective fences for these exclusion areas and for individually retained trees, life expectancy of trees, recommendation for any remedial work, identify acceptable routes for all mains services in relation to tree root zones, identify acceptable locations for roads, paths, parking and other hard surfaces in relation to tree root zones, suggest location for site compound, office, parking and site access, identify location(s) for replacement planting and show existing and proposed levels.

5. The Planning Department has some concerns regarding the impact of the proposed development on existing ecology, including bats. The applicant is therefore requested to provide:

(i) A bat survey, to include the identification of the presence of a roost or identify the potential for a roost to be present (an experienced bat expert will know the evidence to look for in determining whether the buildings are used as a roost by local bats).

(ii) The Heritage Officer also raises concern that given the surrounding 'bat landscape', outdoor lighting could be an issue and requests the retention/enhancement of existing or new planting to screen lighting from the wider landscape. The applicant is requested to comment and confirm that no additional lighting is proposed.

All items above should be undertaken by a qualified and experienced bat expert at the appropriate time of the year and under the weather conditions appropriate for the survey for the survey of such species. The requirement of the Heritage Officer shall be ascertained in this regard.

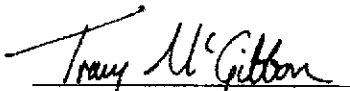
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REG. REF. SD21A/0273

LOCATION: St. Annes and St. Brendans Unit, Peamount Hospital, Newcastle, Co. Dublin



**Tracy McGibbon,
A/Senior Executive Planner**

ORDER: I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date:

29/11/21



Eoin Burke, Senior Planner