" HUMAN BEINGS" (KERGH

IN THE MATTER OF AN APPLICATION TO AN BORD PLEANÁLA **FOR PERMISSION FOR** STRATEGIC **INFRASTRUCTURE** DEVELOPMENT (THE CHILDREN'S HOSPITAL OF **IRELAND**)

ABP Reg. No. PL29N.PA0024

AND IN THE MATTER OF AN ORAL HEARING

Statement of Evidence of Ciara Kellett

1. Qualifications and Experience

My name is Ciara Kellett. I am a Planning Consultant and hold a degree (B.Sc) in engineering from Trinity College and DIT Bolton Street and a Masters degree in Spatial Planning from DIT Bolton Street.

I am responsible for the Human Beings Section and for co-ordination of the EIS. My experience includes:

- Preparation and Management of Environmental Impact Assessments for Clients including EirGrid, ESBI, and Intel Ireland.
- Preparation of statutory Land Use Plans on behalf of County Councils including Collinstown Local Area Plan (2010); Leixlip Local Area Plan (2010); Charlestown Local Area Plan (2010); and Swinford Local Area Plan (2009); and
- Planning Consultancy for a number of different Clients including Bord na Mona, Jacobs Engineering, Intel, Airtricity and Energy Answers.

2. Role in Proposed Development

I am giving evidence to assist the Oral Hearing on the topic of Human Beings and with respect to the co ordination of the EIS along with my colleague Conor Skehan (EIS Study Director). Helen O'Keeffe prepared the Human Beings chapter of the EIS, however, she is on Maternity leave and in her absence I will address this topic.

My role involved attendance at the weekly design meetings and various other miscellaneous meetings. I was responsible for ensuring communication of information between the design team and the environmental consultants.

In addition, I worked with Helen O'Keeffe who ultimately prepared the chapter on Human Beings, contained at Chapter 5 of the EIS.

I have also prepared responses to observations and objections made in relation to this topic which I have provided to assist this Oral Hearing.

3. Key Issues in relation to Human Beings

The proposed development was assessed and the likely significant Human Beings Impacts following mitigation are described at sections 5.5-5.7 of the EIS. These were summarised in the Non-Technical Summary which accompanies the Application and are summarised briefly as follows;-

The development will have a significant capital value and economic benefits for the local, and wider, area. There will be a direct, temporary positive impact with the creation of an average of 1000 construction jobs; and other long-term benefits from

the direct employment of approximately 2600 - 3000 people when the CHol becomes operational. There will be other local benefits as patients, visitors and staff coming to the CHol use local services e.g. coffee shops, gift shops, restaurants, accommodation etc.

There is a history of hospital and medical uses in the area. The Mater Hospital is a long established use and has co-existed with surrounding land uses for over a century. The Mater private hospital has existed since the 1980*s. The development of the CHoI will modernise the paediatric health facilities within the locality, Dublin City and Region and the Country. This has positive economic, health and social impacts for the local and wider community.

During construction there may be temporary impacts on local residents and businesses due to for example, increased traffic flows; disturbance because of ground works and building works; and changed views of the site. These will be reduced or avoided by good site management practice and implementing management plans for traffic, site security etc as outlined in various sections of the EIS.

There may be longer-term impacts experienced by some local residents due to the CHoI including: loss of sunlight and changes to views. It is predicted there will be higher demands for non-car based services – bus, rail, etc., serving the site. These impacts are all clearly articulated in the relevant sections of the EIS.

Whilst the development of a world class paediatric hospital in the area is a key piece of social infrastructure additional positive social impacts may arise from new facilities being made available to the local community as outlined in the Community Gain report and addressed today.

The proposed development will heighten the attractiveness of the area for medical practitioners to establish practices in the local area. This will further improve the health facilities within the local area and inner city. A high quality health infrastructure will also prove attractive to future development.

The economic impacts of the overall development – in terms of employment, economic activity, etc., may be significant – and largely positive, as noted in the EIS.

The incorporation of environmental improvement works to Eccles Street will also have a positive localised impact, notwithstanding the key community gain of a world class children's hospital at this location.

4. Submissions and Responses

My attention has been drawn to the following observations and objections made that appear to be relevant to my area of expertise and I have prepared responses to these that may be of assistance in the determination of this application.

5.1 Submission by Mr. Peter Sweetman

Mr. Sweetman states that the information relating to the Human Beings living in the area is fundamentally flawed.

Response

The information pertaining to Human Beings is set out in Section 5.3 of the EIS and was directly taken from a number of different sources as outlined below:

- the CSO 2006 census data;
- 2) the CSO 2011 census data (as available)
- 3) the Phibsborough/Mountjoy Local Area Plan
- 4) the Dublin City Development Plan
- 5) the Economic Impact Assessment (submitted as part of the Application) which in turn considered a number of publications and data including;
 - a. Trutz Haase, Key profile for Dublin Inner City
 - b. Dublin Chamber of Commerce, Dublin profile, February 2008
 - c. CSO Seasonally Adjusted Standardised Unemployment Rates January 2011
- 6) Meeting with residents

Accordingly the information relating to Human Beings cannot be considered fundamentally flawed.

5.2 Submission by Nuala Morris and others

Ms. Morris states that there will be a "huge influx of people".

Response

Section 5.5 of the EIS indicates the employment numbers associated with the Construction of the Hospital and the direct and indirect jobs expected to be created over the lifetime of this project. The employment numbers highlighted in the Human Beings Section of the EIS were taken from the Economic Impact Statement which accompanied the Planning Application.

Section 5.5.2 of the EIS states that during the construction stage of the development there will be on average 1,000 construction workers and during operation stage of the hospital it is expected that 2600 - 3,000 people will be directly employed by the hospital.

The development of the Adult Mater hospital has resulted in the employment of approximately 700 people over the duration of that development. The additional construction workers anticipated for the CHoI is approximately on average 300. Accordingly whilst there will be an increase in the number of people visiting this site this increase is expected to have a direct, temporary positive impact on the locality.

5.3 Submission by BLEND

BLEND refer to the impact on Residential Amenities, the impact on the residential context of the predominantly 1, 2 &3 storey dwellings in the immediate vicinity and

refer to the objectives of the Z1 and Z2 zoning designations. "To protect, provide and improve residential amenities" and "To protect and/or improve the amenities of residential conservation areas." BLEND state that in order to comply with the Dublin City Plan the amenities of the surrounding residential areas cannot be negatively impacted by development on the subject site.

Response

Residential Amenities are considered within a number of chapters in the EIS. The findings of each of those chapters are taken into consideration in the Human Being section 5.5.6 of the EIS.

Section 5.5.6 states that there will be a significant perceived loss of residential amenity in some properties *adjacent* to the site. The actual details of the impact on sunlight and daylight are provided in the relevant chapters of the EIS (Chapter 9 – Climate and Micro Climate).

With respect to privacy and overlooking, the Architectural Design Statement considers this in Section 5.2 and provides mitigation measures to address this such as fixed interstitial glazing and fritted glass.

In section 5.5.6 of the EIS it is noted that the environmental improvement works to Eccles Street will have a *positive* local impact (further discussed in Chapter 11 – Landscape and Visual Impacts).

Furthermore, it is noted in section 5.5.4 of the EIS that the proposed development of a world class paediatric hospital will heighten the attractiveness of the area for medical practitioners to establish practices in the local area. This will improve the health facilities within the local area and inner city. A high quality health infrastructure will prove attractive to future development in the local LAP area and the wider region.

References to the zoning of the site are addressed in the Planning report. The area is zoned for medical uses in the Development Plan and the proposed development will not represent a deviation from the established land use on the site. The Local Area Plan and the Dublin City Development Plan seeks to facilitate the development of the Mater Hospital as a world class medical institution and incorporates Key Site Objectives to achieve this. This is fully considered in the Planning Report and addressed by the Planning Consultant yesterday.

5.4 Submission by the Heritage Council

The Heritage Council submission states that "There is a substantial risk that this development will intensify property market pressures, demanding changes of use of the existing building stock, much of which is valued for its architectural heritage values in the development plan. It is likely to have an economic impact on the fabric of buildings and the aggregate character of the area if it is permitted."

Response

The existing building stock both on the Mater campus and along Eccles Street is for the most part in use for Medical purposes *currently*. The Mater Hospital is a long established use and has co-existed with surrounding land uses for over a century. The Mater private hospital has existed since the 1980*s. This area is already characterised by medical uses and has experienced numerous hospital developments, extensions, expansions and upgrades over the last 150 years without impact on the building stock in the residential areas surrounding the hospital campus.

The proposed development is to be located on a site that has been *derelict* and used as an ad-hoc car park for a number of years. This development proposes to complete the Eccles Street façade and has been addressed within a number of submissions most notably the Architects.

Finally, the very development of medical uses along Eccles Street has resulted in the conservation of a number of the buildings along Eccles Street.

5.5 Submission by Grangegorman Residents Association

This submission refers to the significant loss of residential amenities.

Response

As per submission at item 5.3 above, Residential Amenities is considered within a number of chapters in the EIS. The findings of each chapter are taken into account in the Human Being section 5.5.6 of the EIS.

As demonstrated in Chapter 9, in particular in relation to the sunlight and daylight analysis, there will be an impact to a small number of houses depending on location and the time of year — dwellings *adjacent* to the site. Grangegorman residential areas are approximately 1km away from the site. This is addressed in chapter 9 as prepared by Arc Consultants. Chapter 11 deals in detail with the visual impact.

The most significant effects are highly localised and are thus confined to a very limited number of dwellings adjacent to the site.

5.6 Submission by P.O'Connor and F.D'Easaille

This submission is concerned with the devaluing of their property due to the proposed development and the proposed height.

Response

See response to item 5.4 above. The Mater Hospital is a long established use and has co-existed with surrounding land uses for over a century. The Mater private hospital has existed since the 1980's. This area is characterised by medical uses. The proposed development will not represent a significant deviation from the established land use on the site or in the vicinity. This area is already characterised by medical uses and has experienced numerous hospital developments, extensions,

expansions and upgrades over the last 150 years. As stated in section 5.5.3 of the EIS, adverse impacts on local landuses are not likely to occur as a result of this proposed development.

The height of the hospital is considered within the EIS – in shadow and daylight studies as mentioned above and in the chapter considering the visual impact. The residual impacts arising on the residential amenity are limited in number and extent.

Finally, the Phibsborough/Mountjoy Local Area Plan and the Dublin City Development Plan fully considered the development of the Children's Hospital on this site. As identified within the Planning evidence given by the Planning Consultant yesterday, this development is fully in compliance with the policies and objectives outlined in those plans.

5.7 Submission by An Taisce

This submission addresses concerns about impact on residential areas adjoining the proposal.

Response

See response to item 5.3 above.

5.8 Submission by Anne Coll

This submission is concerned with the impacts on privacy.

Response

Section 5.5.6 of the EIS considers privacy. The EIS states the following: Impacts on privacy are assessed with regard to the issue of overlooking and also the operation of the hospital. A detailed assessment of overlooking is set out in Section 5 of the Architects Design Statement. That assessment considers all such impacts – particularly the potential for reduced privacy at the residential properties to the north and east of the site, at Leo Street, and outlines measures that have been included to mitigate against this. Any other impacts on privacy that could feasibly arise due to security or management issues on the site (including the on-site no-smoking policy) will be addressed by the implementation of an on-campus security protocol similar to that in operation for the existing Mater Hospital.

5.9 Submission by New Children's Hospital Alliance

This submission states that "The EIS fails to assess the impact on children where it addresses Human Beings".

Response

This hospital represents the upgrading of children's healthcare services serving Dublin City, Region and State.

This facility is intended to be a world class provider of healthcare for children.

The provision of healthcare services is currently divided across three independently incorporated and governed children's hospitals in Dublin. The amalgamation of acute paediatric services in Dublin into a single hospital co-located with a leading adult academic hospital and future maternity services will lead to the consolidation of paediatric services on one site and the creation of a medical hub right in the city centre to serve children.

This proposal will represent a significant <u>positive health impact for children</u> in the city, region and state and whom have been fully considered as part of the overall community which is fully addressed in Chapter 5.