



SHD Unit
An Bord Pleanála
64 Marlborough Street
Dublin 1

12th January 2021

Dear Sir/Madam

Re. Proposed St Kevin's SHD, Cork City

The Heritage Council in principle supports the proposed development at the former St Kevin's Hospital in Cork City and welcomes the opportunity to input on the reuse of a number of landmark protected structures, as part of the overall proposal. We would wish the following matters to be considered as part of the overall SHD assessment and decision-making process:

1. Townscape and Visual Impact Assessment

It is noted that the proposal is unable to use Irish-based Section 28 Guidelines on townscape and visual impact assessment. As An Bord Pleanála is aware, this is because the Section 28 Landscape Guidelines (which do not include urban landscapes) have been in draft format since 2000, despite the launch and publication of the *National Landscape Strategy* in 2015. As such, it is recommended that An Bord Pleanála highlights this significant planning policy gap to the Department of Housing, Local Government and Heritage to ensure that we are not using British planning policy for Irish SHDs. In the meantime, we would recommend that the application and assessment process make reference to Transport Infrastructure Ireland's recently published guidance from December 2020, entitled, *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Specified Infrastructure Projects - Overarching Technical Document*.
<https://www.tii-publications.ie/library/PE-ENV-01101-01.pdf>.

2. Unrecorded Burial Sites?

Given the site's previous use over many decades, it is strongly recommended that the potential for unrecorded burial sites at the complex is addressed in the overall assessment process. This sensitive issue should be handled with the utmost care and respect for all the people involved and their families/descendants. Archival research and expert field survey are advisable in this case to ascertain whether or not burials are present.

3. Recording/YouTube on Restoration of Landmark Protected Structures

The Heritage Council would recommend that the restoration and redevelopment of the protected structures and their historic setting should be recorded by video for the benefit of existing and future generations in Cork along with the Cork diaspora – this could include a weekly/monthly update of activities and progress to raise public awareness and understanding of the overall development proposal and the reuse of important built heritage in an urban setting. Public art projects have been carried out on similar complexes, such as at the Grangegorman complex in Dublin, which interpret the heritage of former institutions. Dialogue with the Cork City Council Heritage Officer and Arts Officer would be beneficial in this regard. Consideration should also be given to interpretative resources to outline the heritage of the complex after the completion of the project.

On behalf of the Heritage Council, I hope that you find the above a useful contribution to ensuring that Cork's unique built heritage is enhanced and celebrated through this important SHD proposal.

Yours faithfully
Alison Harvey MIPI AILI