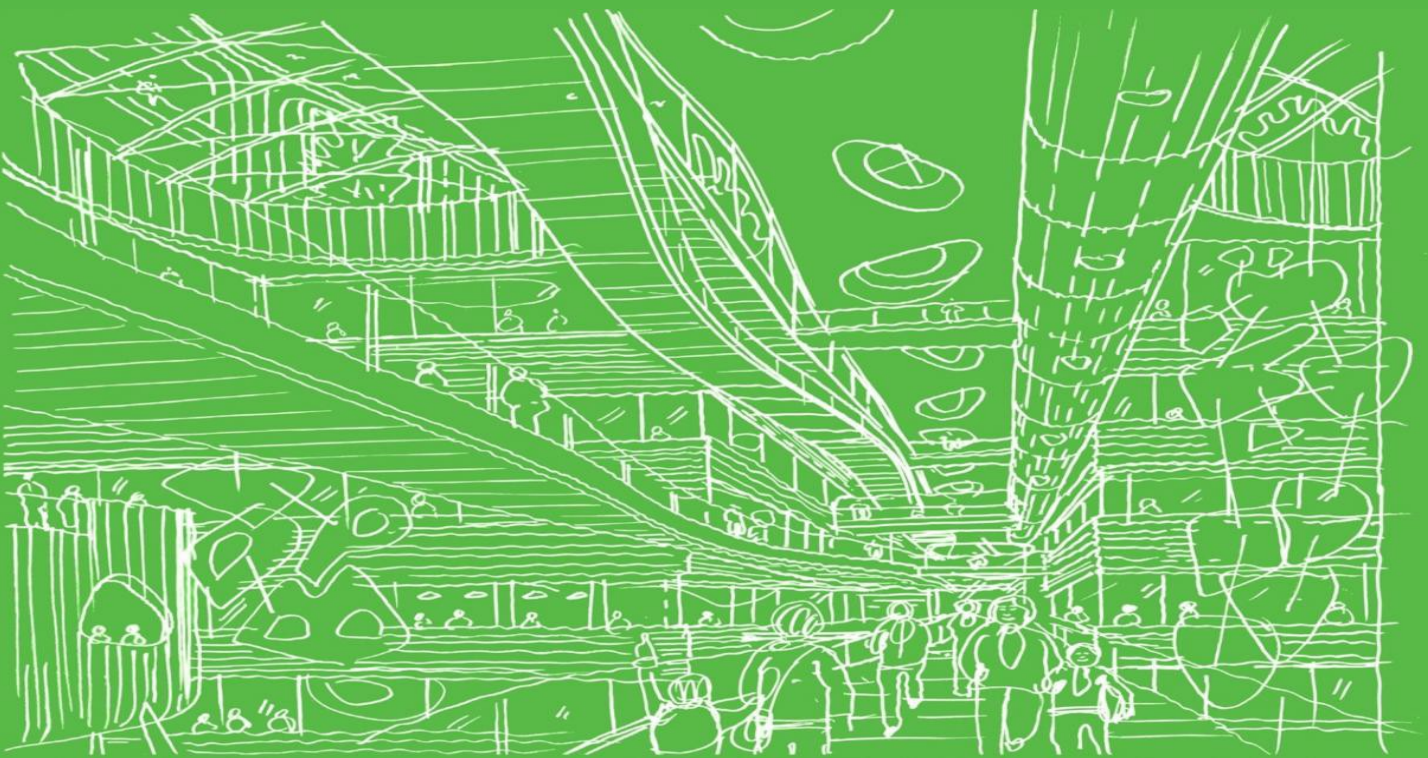


# National Paediatric Hospital Development

## Planning Application

Planning Report



August 2015



**BILFINGER**





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Status: Associate

Date: August 2015

**For and on behalf of GVA Planning and Regeneration Ltd**



# 1. Introduction

This Planning Report has been prepared to accompany an application by the National Paediatric Hospital Development Board, to An Bord Pleanála for a 10 year permission for the National Paediatric Hospital development. This application is made in accordance with the provisions of Section 37E of the Planning and Development Acts, 2000 (as amended), relating to Strategic Infrastructure Developments.

The proposed new National Paediatric Hospital, is an integrated health infrastructure development comprising 6 no. principal elements and ancillary development as set out below:

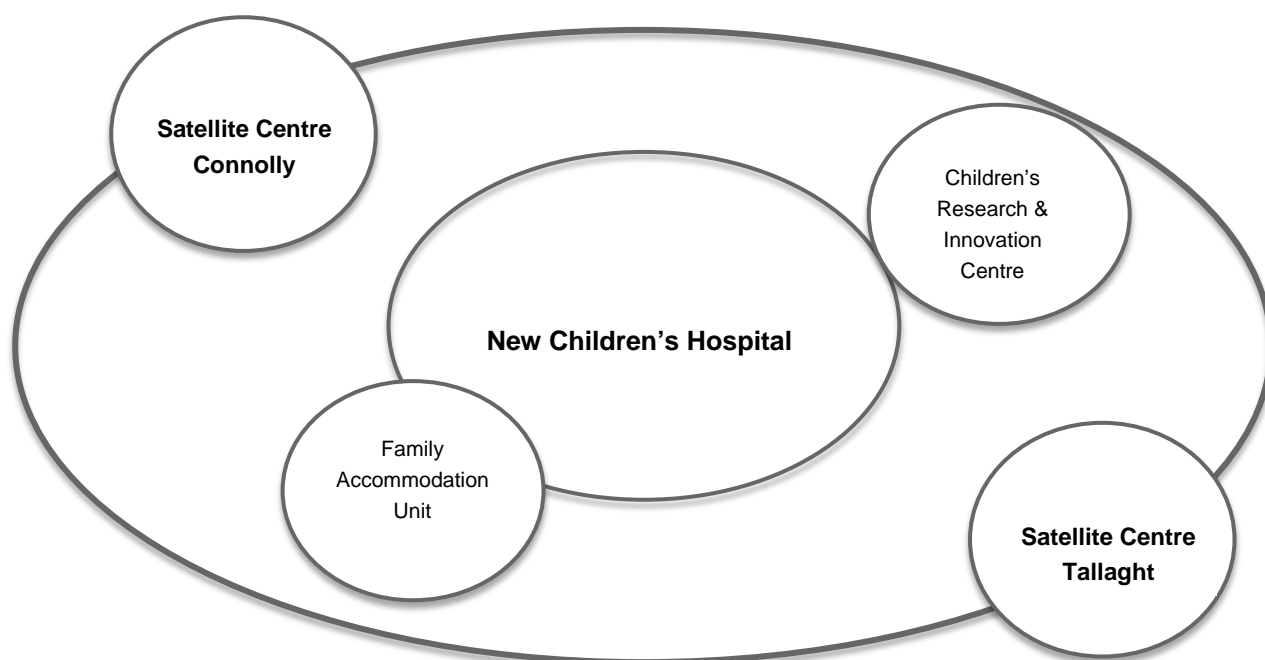
- (i) a 473 no. bed new children's hospital (up to 118,113 sq.m. gross floor area) at the St. James's Hospital campus, James's Street, Dublin 8 (which contains Protected Structures);
- (ii) a 53 no. bed family accommodation unit (up to 4,354 sq.m. gross floor area) at the St. James's Hospital campus, James's Street, Dublin 8 (which contains Protected Structures);
- (iii) a children's research and innovation centre (up to 2,971 sq.m. gross floor area) at the St. James's Hospital campus, James's Street, Dublin 8 (which contains Protected Structures);
- (iv) a construction compound at the former Unilever site at Davitt Road, Drimnagh, Dublin 12;
- (v) a children's hospital satellite centre at The Adelaide & Meath Hospital Dublin (Tallaght Hospital), Belgard Square North, Tallaght, Dublin 24 (up to 4,466. sq.m. gross floor area); and
- (vi) a children's hospital satellite centre at Connolly Hospital campus in Blanchardstown, Dublin 15 (up to 5,093 sq.m. gross floor area).

Each of these elements operates in conjunction with each other, forming one indivisible, integrated project. This fact has been recognised by An Bord Pleanála, which has advised that all the elements of the National Paediatric Hospital Project should be included in a single application and that as one single integrated development it constitutes Strategic Infrastructure Development.

The National Model of Care for Paediatric and Neonatology provides the basis for the integrated nature of the National Paediatric Hospital Project. This Model is the framework for how and where healthcare services will be delivered, managed and organised nationally and is the means by which the Irish healthcare service can respond to changing healthcare needs, address unmet need, improve the existing model of service delivery and incorporate national and international best practices. This Model was informed by extensive research into international best practice, trends in paediatric healthcare and contemporary changes in healthcare.

Having regard to this research, the new children's hospital and children's hospital satellite centres will operate on a 'hub and spoke' basis and are part of a wider integrated programme of service delivery changes designed to improve the future health and wellbeing of children and young people in Ireland. The clinical case for the new children's hospital, including an outline of the Model of Care is attached as Appendix 2.1 of the Environmental Impact Statement (EIS) and is also submitted as a stand-alone document in Volume 1 of the application documentation.

**Figure 1.1: Visual Representation of the Integrated National Paediatric Hospital Project**



## 1.1 Strategic Need for the Proposed Development

Section 2.2 of Chapter 2 and Section 4.2 of Chapter 4 of the EIS explains the strategic need for the development, having regard to the strategic healthcare policy context and delivery of the proposed Model of Care<sup>1</sup>. The main points are as follows:

- The National Paediatric Hospital Project comprises six interrelated components and these elements comprise one indivisible, integrated project and that this critical requirement has inevitably shaped the analysis of the alternative sites for the project
- The National Model of Care for Paediatric and Neonatology provides the foundation for the integrated nature of the project. Based on national and international best practice, this Model is the framework for how and where healthcare services will be delivered, managed and organised nationally and is the means by which the Irish healthcare service can respond to changing healthcare needs; address imminent needs and improve the existing model of service delivery

<sup>1</sup> Please see NPHDB Report – 'The Clinical Case for the New Children's Hospital' – attached to this application.

- The Model requires that the new children's hospital and children's hospital satellite centres will operate on a 'hub and spoke' basis and are part of a wider integrated programme of service delivery changes designed to improve the future health and well-being of children and young people in Ireland
- Section 2.2 of Chapter 2 of the EIS outlines the existing children's hospital facilities contain old and outdated facilities and poor clinical adjacencies that do not meet contemporary service delivery requirements and do not have a sufficient scale and critical mass of clinical activity to improve clinical outcomes for the sickest children and young people.
- The new children's hospital on the St. James's Hospital campus will be at the centre of a network of healthcare as an exemplary facility dealing with patients in need of specialist and complex care. The critical mass of clinical activity achieved by amalgamating the extant three children's hospitals, combined with the sub-specialisation achieved by tri-location with the adult St. James's Hospital and potential future maternity hospital are universally accepted as the key means by which clinical results for the young patients will be secured.
- The children's hospital satellite centres at Tallaght and Connolly Hospital campuses will be at the heart of the 'hub and spoke' Model of Care and will have a critical role in dealing with the projected patient numbers contained in the model, in particular urgent care and out-patient activity.
- The new children's hospital will also be supported by the proposed Children's Research and Innovation Centre, which is integral to the National Paediatric Hospital development and will be co-located with existing academic facilities as part of a focus on research, education and innovation.
- The final key part of the project will be the new Family Accommodation Unit that will enable parents and siblings of sick children with extended hospital stays to stay together and help reduce the emotional impact on all parties.

## 1.2 Purpose of Planning Report

The purpose of this Planning Report is to inform An Bord Pleanála of all of the relevant material and matters that are set out in the planning application and to assist it in its determination of the application. It presents the technical aspects of the application and provides a reference to where information is contained within the planning application package. The information contained within this Report has been informed by the suggested content of a planning report as set out in the Department of Environment, Heritage and Local Government's '*Development Management Guidelines for Planning Authorities*', 2007.

Specifically, this Report and accompanying application documentation address the matters outlined in the Report prepared by An Bord Pleanála's Inspector further to the final pre-application consultation meeting on 6<sup>th</sup> July 2015. These matters are set out in Table 1 below:

Table 1 Matters to be considered in any Application

Matters Raised by An Bord Pleanála	Response
Alternative Sites	The EIS contains a thorough Examination of Alternatives section in Chapter 4
Justification for the siting, scale, functioning and form of the overall scheme in planning and environmental terms.	The Examination of Alternatives and the Architectural Design Report address this issue.
The constrained nature of the St. James' Hospital site and capacity for tri-location (children's hospital, adult teaching hospital and maternity hospital).	A Draft Site Capacity Study has been prepared with respect to St. James's Hospital campus that addresses the ability of the site to accommodate future development. This is submitted with this application.
The ability to accommodate the future growth / expansion of these developments individually and cumulatively.	A Draft Site Capacity Study has been prepared with respect to the St. James's Hospital campus that addresses the ability of the site to accommodate future development. This is submitted with this application.
The developments now and into the future in the context of a new Master Plan for St. James' Hospital complex.	A Draft Site Capacity Study has been prepared with respect to the St. James's Hospital campus that addresses the ability of the site to accommodate future development. This is submitted with this application.
Construction and demolition impacts - developing the project, decanting and the functioning of the established hospital campus throughout this phase.	An outline Construction Management Plan has been prepared and is submitted with the application and the specific matter of the existing hospital operations is addressed therein.
Satellite Centres – their need and applicability in the context of a national and regional strategy relating to same.	The Model of Care and need for the children's hospital satellite centres has been clearly set out in the Children's Hospital Group Report entitled ' <i>The Clinical Case for the New Children's Hospital</i> ' attached to this application.
The ability to accommodate the Satellite Centres at Connolly and Tallaght hospital sites, inclusive of their context within the Master Plans for these hospitals and the environmental and planning impacts thereon.	Draft Site Capacity Studies have been prepared for both children's hospitals satellite campuses and are submitted with this application. These are submitted with this application.
The outcome in the event of one or both Satellite Centres failing to acquire planning permission or failing to be developed.	The Model of Care and need for the children's hospital satellite centres has been clearly set out in the Children's Hospital Group Report entitled ' <i>The Clinical Case for the New Children's Hospital</i> ' attached to this application.
Traffic and transportation – routing, access, modes, car parking.	The Traffic and Transportation chapter (Chapter 6) of the EIS fully addresses this issue.
The proposed movement of the Coombe Hospital and the ability of the St. James's site to accommodate the proposed future maternity hospital.	A Draft Site Capacity Study has been prepared with respect to the St. James's Hospital campus that addresses the ability of the site to accommodate future development. This is submitted with this application.
The relocation of the Rotunda Hospital to Connolly Hospital, Blanchardstown and the ability to accommodate same in the context of the Connolly Hospital Master Plan.	Draft Site Capacity Studies have been prepared for both children's hospital satellite centre campuses and are submitted with this application. These are submitted with this application.
Visual and streetscape impacts on the local and wider environment.	A full landscape and visual impact assessment has been prepared and is submitted as Chapter 14 of the EIS. The design of the proposed development has had particular regard to visual impacts throughout the design process.
Impacts on residential amenity – height, design, scale, structural impacts on adjoining residential properties.	The EIS and this Planning Report fully addresses the issues of adjoining residential amenities.
Public consultation.	The public consultation process is outlined in the document entitled ' <i>National Paediatric Hospital Development Board and the Children's Hospital Group – Engagement Process</i> ' and is attached to this application.
Miscellaneous – archaeology, architectural heritage, impact on infrastructure (underground services).	All of these matters are addressed in full in the EIS.



## 2. The Applicant's Details

### 2.1 The National Paediatric Hospital Development Board

As noted above, the Applicant is the National Paediatric Hospital Development Board (NPHDB) which is seeking permission for the National Paediatric Hospital Project.

The NPHDB was established by order of the Minister for Health and Children in May 2007 (The National Paediatric Hospital Development Board (Establishment) Order, Statutory Instrument No. 246 of 2007). The NPHDB's address is Hospital 7, St. James's Hospital Campus, James's Street, Dublin 8. The Chairperson of the NPHDB is Mr. Tom Costello and Mr. John Pollock is Project Director.

The functions of the NPHDB are set out in the statutory instrument as follows:

*"(A) to plan, design, build, furnish and equip a national paediatric hospital in accordance with a brief approved by the Executive with the prior consent of the Minister, and subject to any subsequent variations to this brief as may be determined by the Executive in consultation with the Board, and with the prior consent of the Minister.*

*(B) in consultation with the relevant hospitals, to prepare plans for the transfer of services from the relevant hospitals (Our Lady's Children's Hospital, Crumlin; the Children's University Hospital, Temple Street; and the National Children's Hospital (AMNCH) at Tallaght) to the new hospital.*

*(C) in consultation with the relevant hospitals, prepare a human resource strategy for the transfer to the new hospital*

*(D) explore the possibility of securing philanthropic contributions to meet all or part of the capital cost of developing the hospital, and foster the philanthropic interests that already exist in relation to the provision of paediatric services."*

### 2.2 The National Paediatric Hospital Development Board and the Health Service Executive

The NPHDB has been established for the sole purpose of planning, designing and building the National Paediatric Hospital Project. It is not the entity that will operate the hospital, the children's hospital satellite centres or the associated elements i.e. the Family Accommodation Unit or the Children's Research and Innovation Centre.

The NPHDB is publically funded by way of capital grants claimed against costs incurred in line with an overall project plan. The Health Service Executive is accountable for ensuring that these funds are appropriately disbursed, as with any health service capital grants. The lands at St. James's Hospital campus, Tallaght Hospital campus, Connolly Hospital campus and Davitt Road are in and will remain in the ownership of the Health Service Executive. In this regard, as site owner, the Health Service Executive has given consent, see Volume 1 of the application documentation.

As detailed in the Department of Finance's Capital Regulations, the NPHDB is the project co-ordinator/contracting authority and is responsible for executing the project on time and in budget. The Health Service Executive is currently the sanctioning and sponsoring authority for the project. This role as the sponsoring authority will transfer to the hospital operational entity when the Minister for Health establishes this structure.

It should be noted that the Health Service Executive is a registered charity (Revenue reference: CHY 16412) which has been established for charitable purposes within the meaning of Section 207 of the Taxes Consolidation Act 1997.

In the event that planning permission is granted for the proposed development, it is the Health Service Executive's intention to avail of exemptions from payment of development contributions provided for in the relevant Section 48 Development Contribution Schemes. Please refer to Section 15.8 of this Report below for further details.

## 3. Relevant Planning Legislation

### 3.1 Strategic Infrastructure Development

The Irish planning system is governed by the provisions of the Planning and Development Act, 2000, as amended, (the Act) and the Planning and Development Regulations, 2001, as amended, (the Regulations). The Strategic Infrastructure Development provisions were introduced into the 2000 Act by the Planning and Development (Strategic Infrastructure) Act, 2006 and inserted a Seventh Schedule into the Act.

Specific Strategic Infrastructure Development project categories fall into the following four classes as set out in the Seventh Schedule of the 2000 Act (as amended):

1. *Energy Infrastructure.*
2. *Transport Infrastructure.*
3. *Environmental Infrastructure.*
4. *Health Infrastructure.*

If a proposed development falls within a type of development listed in the Seventh Schedule, the prospective applicant for planning permission is required to enter into consultations with the Board before applying for planning permission. The purpose of the pre-application consultations is to establish whether, in the opinion of the Board, the proposed development, if carried out, would fall within one or more of the following paragraphs of Section 37A(2):

*"(a) the development would be of strategic economic or social importance to the State or the region in which it would be situated,*

*(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situated,*

*(c) the development would have a significant effect on the area of more than one planning authority."*

If the proposed development, as contained in the Seventh Schedule, is deemed to be Strategic Infrastructure Development by the Board the prospective applicant shall make the planning application directly to An Bord Pleanála. While such applications will not be made to the local Planning Authority, the Planning Authority still has an important role to plan and can, if it wishes, make a recommendation to the Board in relation to the proposed development.

### 3.2 Strategic Infrastructure Development and the National Paediatric Hospital Project

The Seventh Schedule of the Planning and Development Act, 2000, as inserted by the 2006 Planning Amendment (Strategic Infrastructure Development) Act, was amended by Section 78 of the Planning and Development (Amendment) Act, 2010 to include the Strategic Infrastructure Development category of 'Health Infrastructure'. The definition of 'Health Infrastructure' as contained in the Seventh Schedule (as inserted by Section 41 Environment [Miscellaneous Provisions] Act, 2011) is:

*" 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 National Paediatric Hospital development comprises the development of a 473 no. bed hospital at St. James's Hospital campus (in order to facilitate the development, a construction compound will be provided at Davitt Road); two children's hospital satellite centres located at Tallaght and Connolly Hospital campuses; a 53 no. bed Family Accommodation Unit at the St. James's Hospital campus and a Children's Research and Innovation Centre at St. James's Hospital campus. The NPHDB considered that the National Paediatric Hospital development fell within the definition of 'Health Infrastructure' in the Seventh Schedule and entered into pre-application consultations with An Bord Pleanála with respect to same. During these pre-application consultations, the Board advised on the procedures involved and what considerations related to proper planning and sustainable development and the environment, may, in its opinion, have a bearing on its decision.

In consideration of proper planning and sustainable development the Board advised as part of pre-application consultations that the overall National Paediatric Hospital development, including all constituent elements, should be dealt with as one development and the application was progressed on this basis.

Following the completion of the pre-application consultation process, and having regard to the nature and extent of the National Paediatric Hospital development, the Board issued a notice on 10<sup>th</sup> July 2015, in accordance with Section 37B(4)(a) of the Act (as amended) that it was of the opinion that the proposed development would, if carried out fall within the scope of Paragraph (a) of Section 37A(2), i.e. that:

*"The development would be of strategic economic or social importance to the State".*

A copy of this notice from An Bord Pleanála is attached to the application cover letter and is available on the Board's website.

Following this confirmation by An Bord Pleanála that the proposed development is considered to be Strategic Infrastructure Development, this planning application for the National Paediatric Hospital development is now made directly to An Bord Pleanála, in accordance with the provisions of Section 37E of the Act (as amended).

### **3.3 The Environmental Impact Statement (EIS)**

Environmental Impact Assessment (EIA) is a process for anticipating the impacts on the environment caused by a development. An EIS is the document produced to inform that process. EIA is a systematic integrated evaluation of both positive and negative impacts of a project on the natural environment, on beneficial uses of the environment, including man-made structures, amenities and facilities, and the socio-cultural environment.

The aim of the approach is to identify and predict any likely impacts of significance for a given proposed development; to describe the means and extent by which they can be reduced or ameliorated; to interpret and communicate information about the potential impacts; and to provide an input into the decision-making and planning processes. Where effects are identified that are unacceptable, these can then be avoided or reduced during the design process<sup>2</sup>.

The EIS has been informed by the pre-application consultations with An Bord Pleanála undertaken as part of the Strategic Infrastructure process, by the guidance and requirements contained in the Regulations (as amended) and by the following documents:

- '*Guidelines on Information to be contained in Environmental Impact Statements*,' Environmental Protection Agency, 2002.
- '*Advice Notes on Current Practice in Preparation of Environmental Impact Statements*,' Environmental Protection Agency, 2003.

As above, the Environmental Protection Agency (EPA) provides guidance on the information to be contained in an EIS. Specifically, it advises on the environmental areas that may be impacted by the proposed development i.e. Human Beings, Flora and Fauna, Soil and Geology, Hydrogeology and Hydrology, Air Quality and Climate, Noise and Vibration, Waste Management, Landscape and Visual Assessment, Archaeological Heritage, Architectural and Cultural Heritage Material Assets - Site Services and Traffic and Transport. The content of the EIS conforms to the current relevant EIS requirements.

The National Paediatric Hospital development is an integrated development comprising of six interrelated elements i.e. a 473 no. bed children's hospital (in order to facilitate the development a construction compound will be provided at Davitt Road), a Family Accommodation Unit and a Children's Research and Innovation Centre all at St. James's Hospital campus and two children's hospital satellite centres at Tallaght Hospital campus and Connolly Hospital campus. Each of these elements operates in conjunction with each other, forming one indivisible, integrated project.

As one single integrated development all elements are included and have been assessed as part of the EIS. For ease of reference the EIS is presented under the headings of St. James's Hospital, Tallaght Hospital and Connolly Hospital being the three development locations covered by the National Paediatric Hospital development and also being within three separate Local Authority areas. A full assessment of the development(s) proposed on these sites is provided under the relevant heading ensuring that the information relating to each site is readily identifiable.

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<sup>2</sup> Environmental Protection Agency, *Guidelines on the information to be contained in Environmental Impact Statements*, 2002.

In addition to the preparation of an EIS, this application is also accompanied by additional technical reports for the information of the Board. Regard has been had to these Reports by the Design Team and the EIS consultants in assessing whether any significant adverse environmental effects are likely to occur, and recommending appropriate mitigation measures where necessary.

### 3.4 Appropriate Assessment

A Natura Impact Statement (NIS) has been prepared for this application and is included in Volume 1 of the application documentation.

This Report, which contains information required for the competent authority (in this instance An Bord Pleanála) to undertake both a Stage One Screening Assessment and a Stage Two Appropriate Assessment (AA) in respect of the proposed National Paediatric Hospital development, was prepared by Scott Cawley Ltd. in association with Brady Shipman Martin, on behalf of the NPHDB ("the applicant"). It provides information on, and the potential for, the integrated National Paediatric Hospital development, (comprising a new children's hospital, associated Family Accommodation Unit, a Children's Research and Innovation Centre, and related works all at St. James's Hospital campus, Dublin 8 as well as provision of a construction compound at Davitt Road, Dublin 12, and a two children's hospital satellite centres at Tallaght Hospital, Dublin 24 and Connolly Hospital, Dublin 15) to have a significant effect, either individually or in combination with other plans or projects, on any Natura 2000 sites. The information in this Report forms part of, and should be read in conjunction with, the documentation accompanying the application for permission for the proposed development.

Further details are set out in Section 13 of this report and in the attached NIS.

## 4. Details of the Project Team

### 4.1 Team Structure

The National Paediatric Hospital Development Board (NPHDB) was appointed by the Minister for Health to design, build and equip the National Paediatric Hospital project. The Children's Hospital Group Board is the client for the new children's hospital project and is to oversee the integration of the three existing hospitals, in advance of the move to the new facility. The NPHDB has appointed its own design team for the National Paediatric Hospital project.

The Children's Hospital Group will require that the new children's hospital and children's hospital satellite centres are designed in a child-centred, family-friendly approach to ensure that future paediatric services are delivered in an efficient and effective manner that improves clinical outcomes for our children and young people. The Children's Hospital Group is one of seven hospital groups established as part of the acute health sector structural reform programme. The Children's Hospital Group will oversee the operational integration of the three existing children's hospitals at Our Lady's Children's Hospital Crumlin, Temple Street Children's University Hospital and Tallaght Hospital (paediatric service) into one organisation in advance of the move to the new children's hospital on the campus with St James's Hospital, and the children's hospital satellite centres at Tallaght and Connolly Hospitals. It will develop effective corporate and clinical governance structures for the Hospital Group and will develop a corporate and clinical strategy that will guide the integration and reconfiguration of services. In the context of the capital project, it is responsible for preparing for the transition to a single hospital. As the client it has set out the Design Brief and is responsible for ensuring this brief meets the service requirements in line with the model of care approved by the Health Service Executive and the Department of Health. The Children's Hospital Group will liaise with the NPHDB and engage in any decisions where the client role is key.

The NPHDB's Project Team, is responsible for overseeing the planning, designing, building, equipping and commissioning of the new children's hospital and two children's hospital satellite centres. The Board's members and Project Team have the necessary architectural, planning, engineering, legal, construction, clinical, financial and procurement experience and expertise to bring this very large and complex project to completion.

Finally, the Design Team was selected on the basis of proven capability combined with local knowledge. The skills set of the Design Team includes architecture, quantity surveying, mechanical & electrical, civil engineering, structural engineering, project supervisor of the design process, fire safety, planning consultancy and traffic consultancy services. This Team works in collaboration with the NPHDB to deliver the integrated National Paediatric Hospital development.

## 4.2 Composition of the Design Team

The Design Team is led by the Project Architects and has developed the project from the initial concepts through to design stage since its appointment in 2014. The progression of the project has also been informed by various consultants, either through the design process itself, or through feedback from the EIS process, as shown in Table 2 below.

The main agent in terms of the Strategic Infrastructure Development process is the project's planning consultants GVA Planning and Regeneration Ltd., Second Floor, Segrave House, 19-20 Earlsfort Terrace, Dublin 2.

**Table 2 Project Design Team and Consultants**

Consultant	Address	Role
BDP Architects	Blackhall Green, Dublin 7.	Architectural Design - St. James's Hospital Site
O'Connell Mahon Architects	9 Fitzwilliam Place , Dublin 2.	Architectural Design – St. James's Hospital Site
HLM Architects	10th Floor, Causeway Tower, 9 James Street South, Belfast BT2 8DN, United Kingdom.	Architectural Design – Satellite Centres
Coady Partnership Architects	Mount Pleasant Business Centre, Mount Pleasant Avenue, Ranelagh Dublin 6.	Architectural Design – Satellites Centres
GVA Planning and Regeneration Limited	Second Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2.	Planning Consultants for Project and EIS Consultant – Introduction, Description of the Proposed Development, Planning and Development Context, Examination of Alternatives, Human Beings and Interactions and Potential Cumulative Impacts
Arup Consulting Engineers	50 Ringsend Rd, Dublin 4.	Traffic Consultant for Project and EIS Consultant – Traffic and Transportation
Brady Shipman Martin	Canal House, Canal Road, Dublin 6.	Environmental & Landscape Consultant and EIS Consultant – Flora and Fauna, Micro Climate and Landscape and Visual Impact Assessment. Natura Impact Statement
O'Connor Sutton Cronin Multidisciplinary Consulting Engineers	9 Prussia Street, Stoneybatter, Dublin 7.	Engineering Services/ Structural Design and Water Consultant and EIS Consultant - Soil and Geology, Hydrogeology and Hydrology and Material Assets – Site Services for St. James's Hospital and Davitt Road.
Roughan & O'Donovan	Arena House, Arena Road, Sandyford, Dublin 18.	Engineering Services/ Structural Design and Water Consultant and EIS Consultant - Soil and Geology, Hydrogeology and Hydrology and Material Assets – Site Services for the children's hospital satellite centres
Ethos Engineering	Penthouse Suite, Apex Business Centre, Blackthorn Road, Sandyford, Dublin 18.	Engineering Services/ Structural Design and Water Consultant and EIS Consultant - Material Assets – Site Services for the children's hospital satellite centres
AWN Consulting	The Tecpro Building, Clonsaugh Business & Technology Park, Clonsaugh, Co. Dublin.	EIS Consultant - Waste Management, Noise and Vibration and Air Quality and Climate Consultants
RWDI Consulting Engineers	Unit 1 Tilers Road, Milton Keynes, Buckinghamshire MK11 3LH, UK.	EIS Consultant – Micro-Climate
Michael Slattery Associates	19 Windsor Place, Lower Pembroke Street, Dublin 2.	Fire Consultant for St. James's Hospital and the children's hospital satellite centres
Courtney Deery	Lynwood House, Ballinteer Road,	EIS Consultant - Archaeological Heritage and



Heritage Consultancy	Dublin 16.	Cultural Heritage
Mr. Rob Goodbody	Old Bawn, Old Connaught, Bray, Co. Dublin	EIS Consultant - Cultural Heritage
Scott Cawley	401-404, 127 Baggot Street Lower, Dublin 2	Natura Impact Statement
Bruce Shaw	Hoban House, Haddington Rd, Dublin 4	Quantity Surveyors



## 5. Detail of Landowners and Relevant Consents

The lands subject of this application, which includes three separate hospital campuses and a construction compound site, are in multiple ownerships with various interests represented thereon. A series of letters of consent are attached to Volume 1 of the application documentation with respect to the St. James's Hospital campus and from both Tallaght Hospital and Connolly Hospital.

Additional temporary works will be carried out to adjoining/adjacent lands to the south of the new children's hospital on St. James's Hospital campus relating to the provision of a temporary construction access route and subsequent to the termination of this use the upgrading of a section of the linear park at this location. A letter of consent from Dublin City Council (DCC) and from others relating to these lands is included in Volume 1.

In addition, the development on St. James's Hospital campus will also include the realignment of the Driminagh Sewer, road works and works to the public realm at South Circular Road, Brookfield Road and James's Street. The letter of consent from DCC also relates to these lands. A letter of consent from Irish Water in relation to the sewer is also enclosed. A letter of consent from DCC as above relates solely to lands in the ownership of DCC which are currently being leased to CIE, with CIE also providing a letter of consent in this regard.



## 6. Description of the Proposed Development

The National Paediatric Hospital Project is an integrated development comprising of six interrelated elements set out below:

- (i) a 473 no. bed new children's hospital (up to 118,113 sq.m. gross floor area) at the St. James's Hospital Campus, James's Street, Dublin 8 (which contains Protected Structures);
- (ii) a 53 no. bed family accommodation unit (up to 4,354 sq.m. gross floor area) at the St. James's Hospital Campus, James's Street, Dublin 8 (which contains Protected Structures);
- (iii) a children's research and innovation centre (up to 2,971 sq.m. gross floor area) at the St. James's Hospital Campus, James's Street, Dublin 8 (which contains Protected Structures);
- (iv) a construction compound at the former Unilever site at Davitt Road, Drimnagh, Dublin 12;
- (v) a children's hospital satellite centre at The Adelaide & Meath Hospital Dublin (Tallaght Hospital), Belgard Square North, Tallaght, Dublin 24 (up to 4,466. sq.m. gross floor area); and
- (vi) a children's hospital satellite centre at Connolly Hospital Campus in Blanchardstown, Dublin 15 (up to 5,093 sq.m. gross floor area).

A detailed description of the proposed development is set out in Chapter 2 of the EIS. In terms of the various elements of the proposed development, they can be summarised as below.

### 6.1 Proposed Development at the St. James's Hospital Campus, James's Street, Dublin 8

The proposed development on a 8.7 ha site on St. James's Hospital campus comprises:

- The demolition of all buildings on the site of the new children's hospital, Family Accommodation Unit and the proposed Children's Research and Innovation Centre;
- A new children's hospital building and associated helipad;
- A two-level underground car park under same, with a further level of shared facilities management hub and energy centre below;
- A Children's Research and Innovation Centre;
- A Family Accommodation Unit;
- Public realm improvements to: the existing St James's campus spine road and the demolition of 2 no. buildings and relocation of parking to accommodate same; the linear park at the Rialto Luas stop and the public steps between Mount Brown and Cameron Square;

- Improvements to the road junction at the existing campus entrance on St James's Street and a new campus entrance piazza from Brookfield Road / South Circular Road, with minor improvements to these roads;
- A new vehicular entrance from Mount Brown;
- A realigned internal campus road;
- A new shared flue stack for the St. James's Hospital campus; and,
- A range of infrastructure works, including the diversion of the existing Drimnagh Sewer and revised boundary treatments.

## **6.2 Davitt Road Construction Compound, Former Unilever Site, Davitt Road, Drimnagh, Dublin 12**

Permission is being sought, for a period of up to 10 years, for the provision of a construction compound of 0.80 ha on a 1.29ha site at the former Unilever Site at Davitt Road, Drimnagh, Dublin 12 to facilitate the construction of the National Paediatric Hospital development at St. James's Hospital campus in order to accommodate a dry storage and staging area during the construction phase. The compound area of 0.80 ha will be enclosed with a 2.4m high timber hoarding, with gates at the northeast corner opposite the existing entrance from Davitt Road. The compound will be offset 5.0m from the boundary with the permitted Health Service Executive ambulance base to the west (Dublin City Council Reg. Ref. No. 2309/15), and is located to avoid an existing wayleave through the site along the road frontage to the north.

## **6.3 Proposed Development at The Adelaide & Meath Hospital Dublin (Tallaght Hospital), Belgard Square North, Tallaght, Dublin 24**

The proposed development of the children's hospital satellite centre for the delivery of urgent and out-patient care at a 1.04 ha site at the Adelaide and Meath Hospital (Tallaght Hospital) comprises the construction of an extension of up to 3,142 sq.m. to the hospital and refurbishment works of up to 1,324 sq.m. at ground floor level of the existing hospital building as part of the National Paediatric Hospital development. The development will be located on an open area of grass west of the hospital access road and south of the main adult hospital entrance, abutting the gable end of the existing ward and administration block and will connect back into the existing hospital through the existing refurbished ground floor of the existing administration department. The proposed building will be three storeys in height with roof top plant area at 118.075m Ordnance Datum or up to 15.575m at its highest point (flues extend to 119.2m Ordnance Datum) above the street level at the new entrance (the Ordnance Datum at the adjacent existing pavement is 102.5m).

## 6.4 Connolly Hospital, Blanchardstown, Dublin 15

The proposed development of the children's hospital satellite centre for the delivery of urgent and out-patient care on a 1.25 ha. site at Connolly Hospital comprises the construction of a three storey extension of up to 4,990 sq.m. to the hospital and internal reconfiguration works of up to 103 sq.m. to the existing hospital as part of the National Paediatric Hospital development. The proposed development will be located to the east of the existing main entrance on an area of open grass and will connect back into the existing hospital via a new link corridor. An existing garden located to the west of the existing hospital entrance will be integrated with the new development. The building height will be 66.425m above Ordnance Datum or up to 12.125m high at its highest point (flues extend to 67.72m Ordnance Datum) above the street level at the new entrance (the adjacent existing pavement is 54.300m Ordnance Datum). The entrance on the west of the new building will be accessed from the reconfigured existing hospital set down and pick up area. The urgent care entrance is located on the east elevation of the building adjacent to the ambulance parking area.





## 7. Documents Submitted as Part of the Planning Application

### 7.1 Planning Documentation

The planning application as submitted to An Bord Pleanála as Strategic Infrastructure Development consists of the following documents:

**Table 3 Planning Application Documents as submitted**

<b>Volume 1 – Planning Application Documentation</b>	
<b>Document</b>	<b>Author</b>
Cover Letter to An Bord Pleanála	GVA
Completed An Bord Pleanála Strategic Infrastructure Development Planning Application Form and Appendices	GVA
Planning Report and Appendices	GVA
Letters of Consent from Landowners (included with the Planning Application form and appended to the Planning Report)	Varies
Copy of Site Notice	GVA
Copy of Newspaper Notices (Irish Independent and The Herald, Monday 10 <sup>th</sup> August 2015)	GVA
Clinical Case for the New Children's Hospital	NPHDB
Harnessing the Potential – Maximising the Community Benefit from the new Children's Hospital	NPHDB
Natura Impact Statement	BSM and Scott Cawley
Schedule of Drawings	BDP

<b>Volume 2 – Architectural Design Reports</b>	
<b>Document</b>	<b>Author</b>
Architecture Design Report – St. James's Campus	BDP
Appendix 1: Tree Survey Report	BSM
St James's Campus Draft Site Capacity Study	BDP
Appendix 1: Schedule of Areas	BDP
Appendix 2: St James's Hospital Campus Public Realm Strategy	BDP
Architecture Design Report – Satellite Centres	HLM
Connolly Draft Capacity Study	Coady Partnership
Tallaght Draft Capacity Study	Coady Partnership

<b>Volume 3 – Design Drawings</b>	
<b>Document</b>	<b>Author</b>
Architectural Drawings (SJH)	BDP
Engineering Drawings (SJH)	OCSC and Arup
Architectural Drawings (Satellites)	HLM/Coady Partnership
Engineering Drawings (Satellites)	ROD

Volume 4 – Engineering	
Document	Author
Engineering Services report for SJH Campus	OCSC
Appendix 1 - Civil & Drainage Drawings	OCSC
Appendix 2 - Drimnagh Sewer Options report	OCSC
Appendix 3 - Atkins Drainage Modelling Development	OCSC
Site Specific Flood Risk Assessment	OCSC
Outline construction Management Plan	OCSC
Road Safety Audit	Aecom
Lighting Report	ARUP
C&S Report – children’s hospital satellite centre Tallaght	ROD
MEP Engineering Report– children’s hospital satellite centre Tallaght	ETHOS
Energy Report– children’s hospital satellite centre Tallaght	ETHOS
C&S Report – children’s hospital satellite centre Connolly	ROD
MEP Engineering Report– children’s hospital satellite centre Connolly	ETHOS
Energy Report– children’s hospital satellite centre Connolly	ETHOS
Outline Construction Management Plan – children’s hospital satellite centre Connolly	Bruce Shaw

Volume 5 – EIS	
Document	Author
Non-Technical Summary	GVA in conjunction with EIS Consultants
Introduction	GVA
Description of the Proposed Development	GVA in conjunction with the Design Team
Planning and Development Context	GVA
Examination of Alternatives	GVA and NPHDB
Human Beings	GVA
Traffic & Transportation	Arup
Soil and Geology	OCSC and ROD
Hydrogeology and Hydrology	OCSC and ROD
Flora and Fauna	BSM
Waste Management	AWN
Noise and Vibration	AWN
Air Quality and Climate	AWN
Micro Climate	BSM and RWDI
Landscape and Visual Impact Assessment	BSM
Archaeological Heritage	Courtney Deery
Architectural and Cultural Heritage	Courtney Deery and Mr. Rob Goodbody
Material Assets – Site Services	OCSC, ROD, Arup and Ethos
Interactions and Potential Cumulative Impacts	GVA

**Volume 6 – EIS Appendices 1**

Document	Author
Environmental Site Assessment Report	OCSC
Ground Investigation Report	OCSC
Waste Classification report	OCSC
Soil & Geology	ROD

**Volume 7 – EIS Appendices 2**

Document	Author
Chapter 2 Appendices - Description of the Proposed Development	GVA
Chapter 3 Appendices - Planning and Development Context	GVA
Chapter 4 Appendices -Examination of Alternatives	GVA
Chapter 5 Appendices -Human Beings	GVA
Chapter 6 Appendices -Traffic & Transportation	ARUP
Chapter 7 Appendices -Soil and Geology	OCSC and ROD
Chapter 8 Appendices -Hydrogeology and Hydrology	OCSC and ROD
Chapter 9 Appendices -Flora and Fauna	BSM
Chapter 10 Appendices -Waste Management	AWN
Chapter 11 Appendices -Noise and Vibration	AWN
Chapter 12 Appendices -Air Quality and Climate	AWN
Chapter 13 Appendices -Micro Climate	AWN
Chapter 15 Appendices -Archaeological Heritage	Courtney Deery
Chapter 16 Appendices -Architectural and Cultural Heritage	Courtney Deery and Mr. Rob Goodbody
Chapter 17 Appendices -Material Assets – Site Services	OCSC, ROD, Arup and Ethos

**Volume 8 – EIS Appendices 3**

Document	Author
Chapter 14 Photomontages	BSM

**Other Items**

Document	Author
Model – A scale model of the proposed development as it relates to the St. James's Hospital Campus	BDP
Electronic copy of all documents and drawings on DVD	BDP

Each one of the above read in conjunction with the planning and other drawings.

## 7.2 Planning Drawings

Schedules of planning drawings by BDP, OCMA, HLM and Coady architects, as well as other drawings which have been included for information purposes, such as engineering drawings by OCSC, ROD, Ethos and Arup, site survey and other drawings is attached to Volume 1 as set out above.

### 7.3 The Planning Application Fee

Given that the proposed development has been identified as Strategic Infrastructure Development by An Bord Pleanála, payment of the statutory fee of €100,000 is being made by the Applicant by submission of cheque made out to same. This cheque is submitted with the application documentation.

## 8. Compliance with the Planning and Development Regulations, 2001 (as amended)

This application, being Strategic Infrastructure Development, is made directly to An Bord Pleanála. In this regard Section 37E of the Act (as amended) sets out requirements in relation to making a Strategic Infrastructure Development application to An Bord Pleanála, however, it does not contain specific requirements for drawings and materials to be submitted. In this regard we note the guidance provided by An Bord Pleanála as part of the Strategic Infrastructure Development planning application form under the heading 'General Guidance Note' which states:

*"The range and format of material required to be compiled/submitted with any application in respect of a proposed strategic infrastructure development shall generally accord with the requirements for a planning application as set out in the Planning and Development Regulations, 2001 to 2011 and those Regulations should therefore, be consulted prior to submission of any application."*

Based on the above, the requirements of Articles 22 and 23 of the Regulations (as amended) are noted and of relevance. The subject planning application complies with these requirements as far as possible, as outlined below. In this regard it should be noted the drawings submitted with this application, which includes development on four separate sites in three Local Authority jurisdictions, has been discussed with An Bord Pleanála. Notwithstanding the requirements for some additional macro level drawings, the overall application seeks to comply with the requirements of Articles 22 and 23 as follows:

In accordance with Article 22(2)(b) and following consultations with An Bord Pleanála, the subject sites are outlined in red on the Site Location Maps, 1:1,000 (Drawing Nos. NPH-A-BDP-PL-00-ST-0001, NPH-A-OCMA-DR-XX-DR-0010, 1000 and 2000), prepared by BDP and HLM. The lands which adjoins, abuts or are adjacent to the lands to be developed and which are under the control of the applicant are outlined in blue. The way leave at St. James's Hospital and Davitt Road are identified in yellow

- In accordance with Article 22(2)(b)(iv) the position of the site notices erected are identified on the Site Location Maps (Drawing Nos. NPH-A-BDP-PL-00-ST-0001, NPH-A-OCMA-DR-XX-DR-0010, 1000 and 2000) prepared by BDP and HLM. The site notices have been erected at the locations set out on the above. The overall locations of the development sites have been set out on a drawing at 1:50,000 as agreed with An Bord Pleanála (Drawing no. NPH-A-OCMA-DR-XX-XX-0001).
- The site notices are situated to ensure maximum public awareness of the nature and extent of the proposed development. Having regard to Article 19(4) of the Regulations (as amended), it is noted that planning applications have been made on Davit Road in respect of land substantially consisting of the site or part of the site to which the present application relates has been made within the last 6 months. The site notices at these locations are therefore, printed on a yellow background, with the notices on the others sites printed on a white background.
- In accordance with Article 22(2)(a) the planning application is accompanied by a copy of the newspaper notice, in the format provided by An Bord Pleanála.

- In accordance with Article 23(1)(a) the sites, which are the subject of this application, are outlined in red on the enclosed Site Plans prepared by BDP and HLM, at a scale of 1:500.
- The Site Plans show all buildings, roads, boundaries and other features on, adjoining or in the vicinity of the land or structure to which the application relates. The Site Plan also indicates the distances from the proposed structures to the site boundaries.
- In accordance with Article 23(1)(b) other plans, elevations and sections are drawn at a scale of not less than 1:200.
- In accordance with Article 23(1)(c) the Site Layout Plan and other plans show the levels of the site, where applicable, relative to Ordnance Survey Datum.
- In accordance with Article 23(1)(d) drawings of elevations of the proposed structures show the main features of any buildings which would be contiguous to the proposed structure if it were erected, whether on the application site or in the vicinity, at a scale of not less than 1:200, as may be appropriate. The project architects, BDP, have additionally enclosed Contextual Elevation drawings at a scale of where contiguous elevations at a scale of 1:200 were not achievable due to the size of the site.
- In accordance with article 23(1)(e) plans are marked/coloured to distinguish between existing structures and the works proposed.
- In relation to the structures proposed for demolition on St. James's Hospital Campus, Article 22(5) of the Regulations (as amended) does not require floor plans of these buildings. However, a drawn record, in the form of a Site Plan (Drawing No. NPH-A-OCMA-DR-XX-DP-0010), roof plans and elevations (Drawing Nos. vary) have been included for completeness. It should be noted that it is not proposed to demolish any Protected Structures, however, as two structures have been identified as having architectural interest, the chapel and Garden Hill House, a full set of drawings has been submitted in relation to these, see drawing pack. We note that while permission has been granted to demolish the chapel under the private hospital application (An Bord Pleanála Reg. Ref. PL29S.236070) as this application was not implemented it is included for demolition in this application. In addition, the chapel has been examined in detail as part of the EIS assessment of architectural heritage.
- In accordance with article 23(1)(g) of S.I. No. 685 of 2006 all Ordnance Survey mapping is appropriately identified.
- In accordance with article 23(1)(h) of S.I. No. 685 of 2006 the north point is indicated on all relevant maps and plans.

## 9. Details of Engagement and Consultation

### 9.1 Pre-Application Consultations

Given the nature of the proposed development, which is located in three separate Local Authority jurisdictions, the proposed development has been subject to a number of pre-planning meetings with Dublin City Council, South Dublin County Council and Fingal County Council. Furthermore pre-application consultations in accordance with Section 37B(1) of the Act, as amended, have taken place with An Bord Pleanála. Table 4 below provides a list of these meeting in chronological order.

**Table 4 Formal Pre-Application Consultations**

Local Authority	Date	Subject Matter
An Bord Pleanála	20/06/2013	Meeting - first pre-application consultation meeting between An Bord Pleanála and the NPHDB. A general context of the proposed development was set out.
Dublin City Council – Planning	8/08/2013	Meeting – To discuss planning issues in relation to the St. James’s hospital site including a masterplan for the site.
Dublin City Council – Roads	13/08/2013	Meeting – To discuss transport issues in relation to the St. James’s hospital site.
Dublin City Council – Planning	22/11/2013	Meeting – To discuss the intention of making an application
Dublin City Council – Planning and Roads and Traffic	19/02/2014	Meeting – Planning and traffic issues discussed.
Dublin City Council -	18/03/2014	Meeting – To discuss pre-planning consultations with the local community and a community benefit strategy.
An Bord Pleanála	08/05/2014	Meeting - Presentation to An Bord Pleanála setting out the context of the project and the identification by the An Bord Pleanála of core issues.
Dublin City Council	11/07/2014	Meeting – Meeting to update Dublin City Council on developments with the project.
Dublin City Council – Planning and Irish Water	10/09/2014	Meeting – Design Team introduction and discussion on <i>inter alia</i> planning, water services, roads and traffic
An Bord Pleanála	30/10/2014	Meeting – To discuss the overall project including a presentation on the main elements of the project.
Dublin City Council Drainage and Water Divisions and Irish Water	17/09/2014	Meeting - Drimnagh Sewer, flood risk, foul drainage, surface water drainage and water supply.
Dublin City Council - Transportation	22/09/2014	Meeting - To discuss the scope of the Transportation Assessment for the proposed new children’s hospital at St James’s Hospital
Dublin City Council Drainage and Water Divisions and Irish Water	01/10/2014	Meeting - Drimnagh Sewer, flood risk, foul drainage, surface water drainage.
Dublin City Council Drainage and Water Divisions and Irish Water	16/10/2014	Meeting - Drimnagh Sewer, flood risk, foul drainage, surface water drainage and water supply.
Dublin City Council Drainage Division and Irish Water	04/11/2014	Meeting - Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Water Division and Irish Water	04/11/2014	Meeting - Water Supply
South Dublin County Council	5/11/2014	Meeting – Initial meeting providing an overview of the project
Fingal County Council	7/11/2014	Meeting – Initial meeting providing an overview of the project
Dublin City Council – Planning	14/11/2014	Meeting – Design Team and Dublin City Council team on a range of matters including <i>inter alia</i> water services, roads and traffic, Davit Road and design.

An Bord Pleanála	17/11/2014	Meeting – To discuss overall project including a presentation on the main elements of the project and a design update.
Dublin City Council – Archaeology	6/12/2014	Meeting – Archaeological matters
An Bord Pleanála and Dublin City Council	08/12/2014	Meeting – Planning issues discussed including <i>inter alia</i> : zoning; draft site capacity study for St. James's; transport; archaeology; drainage; and height.
Dublin City Council Drainage Division and Irish Water	18/12/2014	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Drainage Division and Irish Water	26/01/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Drainage Division and Irish Water	18/02/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council – Transportation	2/03/2015	Meeting – To discuss the on-going new children's hospital transportation assessment
Dublin City Council Drainage Division and Irish Water	12/03/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council – Archaeology	12/03/2015 -13/03/2015	Informal Meeting – Discussion on history of the site, the records and corporation minutes.
Dublin City Council – Planning	13/03/2015	Meeting – Design Team and Dublin City Council team on a range of matters including <i>inter alia</i> design, roads and traffic, height, visual impact.
Dublin City Council Drainage Division and Irish Water	26/03/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council – Planning	31/03/2015	Meeting – To discuss the on-going new children's hospital transportation assessment
Dublin City Council Water Division and Irish Water	01/04/2015	Meeting – Water Supply
An Bord Pleanála	8/04/2015	Meeting – To discuss overall project and deal with the satellite centres in greater detail.
Dublin City Council Drainage Division and Irish Water	15/04/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Drainage Division and Irish Water	28/04/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Drainage and Water Divisions and Irish Water	14/05/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council – Planning and Irish Water	19/05/2015	Meeting – Design Team and Dublin City Council Team on a range of matters including <i>inter alia</i> design, traffic and masterplan.
Dublin City Council – Transportation	21/05/2015	Meeting – To discuss the on-going new children's hospital transportation assessment
Dublin City Council Water Division	21/05/2015	Meeting – Water supply
Dublin City Council Drainage Division and Irish Water	28/05/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council	29/05/2015	Meeting – Discussions on a number of items including <i>inter alia</i> interface with linear park, alignment of temporary road, duration of temporary road works, removal of trees, red line, security and integration of all entrances
Fingal County Council – Planning and Transportation	9/06/2015	Meeting – formal pre-planning meeting to discuss the satellite centre.
Dublin City Council Drainage Division and Irish Water	16/06/2015	Meeting – Drimnagh Sewer, foul drainage and surface water drainage.
South Dublin County Council – Planning Department	21/06/2015	Meeting – Formal pre-planning meeting to discuss the satellite centre.
An Bord Pleanála	23/06/2015	Meeting – To discuss planning issues and updates on overall



		project
Dublin City Council Drainage Division and Irish Water	30/06/2015	Meeting - Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council Water Division and Irish Water	02/07/2015	Meeting – Water supply
An Bord Pleanála	06/07/2015	Meeting – To discuss overall project and close the pre-application consultation stage.
Dublin City Council Drainage Division and Irish Water	09/07/2015	Meeting - Drimnagh Sewer, foul drainage and surface water drainage.
Dublin City Council - Transportation	22/07/2015	Meeting - To discuss the on-going new children's hospital transportation assessment
Dublin City Council – Drainage Division	22/07/2015	Meeting - Surface water and Flood Risk Management

## 9.2 Mandatory Consultations with Prescribed Bodies

Section 37E(3)(c) of the Act (as amended) requires that a copy of the planning application and EIS is sent to any prescribed authorities in advance of lodging the application with An Bord Pleanála. An Bord Pleanála in a letter dated 10<sup>th</sup> July 2015 provided a list of the prescribed bodies to be notified of this application. These are as follows:

- Minister for Arts, Heritage and the Gaeltacht
- Minister for Communications, Energy and Natural Resources
- Minister for Health
- Minister for Environment, Community and Local Government
- Minister for Transport, Tourism and Sport
- Dublin City Council
- Fingal County Council
- South Dublin County Council
- National Roads Authority
- Irish Water
- An Taisce
- The Heritage Council
- Inland Fisheries Ireland
- CIE
- Railway Procurement Agency
- National Transport Authority
- Health Service Executive

In addition to the above, consultation has been undertaken with some of the prescribed bodies and these are detailed below in Table 5:

**Table 5 List of Consultations undertaken with Prescribed Bodies**

Body	Date	Subject Matter
Railway Procurement Agency	1/12/2014	Meeting - To discuss the proposals for the new children's hospital at St James's Hospital campus
Irish Water	01/05/2015	Meeting - Drimnagh Sewer, foul drainage, water supply and planning related matters
Department of Arts, Heritage and the Gaeltacht	19/06/2015	Letter - A response dealing with the EIS and AA scoping for proposed new children's hospital
National Transport Authority	2/04/2015	Meeting - To discuss the on-going new children's hospital transportation assessment
National Transport Authority	15/04/2015	Meeting - To discuss future public transport proposals
Railway Procurement Agency	17/06/2015	Meeting - Basement construction and temporary campus road realignment having regard for proximity to LUAS
National Transport Authority	15/07/2015	Meeting - To discuss the on-going new children's hospital transportation assessment
An Taisce	23/07/2015	Meeting - To discuss the overall project

### 9.3 Engagement with Stakeholders

As part of the preparation of this planning application, the Design Team has been in consultation with a number of bodies and utility providers either directly through meetings or via correspondence. Table 6 below provides a list of the consultation undertaken in chronological order, including a brief overview of the items discussed at each as follows:

**Table 6 List of informal consultations with statutory stakeholders and utility providers**

Body	Date	Subject Matter
ESB Networks	6/11/2014	Initial meeting - Discuss the proposed development
ESB Networks	18/11/2014	Meeting - To discuss loads and connection options
Gas Networks Ireland <sup>3</sup>	11/12/2014	Meeting - To discuss the option for new gas supply and enabling works
Eircom	11/12/2014	Meeting - To discuss telecoms requirements
ESB Networks	25/02/2015	Meeting - To review Arup proposals for power supply to the campus.
Gas Networks Ireland	25/02/2015	Meeting - To review Arup proposals for the new gas supply and alterations to existing gas services prior to submitting the application to GNI.
Gas Networks Ireland	13/04/2015	Meeting - To assess options to improve the resilience of the gas supply to the campus.
ESB Networks	22/04/2015	Meeting - To assess the supply options to the new children's hospital/St. James's Hospital campus.
Air Corps	25/05/2015 – 19/06/2015	E-mail and telephone – discussions in relation to the air ambulance for the new hospital.

### 9.4 Public Consultations

As detailed in the Engagement Process Report prepared by the NPHDB and the Children's Hospital Group, there has been extensive consultation with local residents. Throughout the engagement process we listened to their concerns and adapted and amended plans for the new children's hospital where possible. The new children's hospital wants to be a good neighbour. As a direct result of ongoing engagement the most notable actions were taken:

<sup>3</sup> Gas Networks Ireland is the new name for Bord Gais Networks

- The level of the internal road was lowered
- Trees will be planted to improve privacy for houses overlooked by the hospital.
- Planning for the Family Accommodation Unit is being submitted at the same time as the new children's hospital as it is an integrated project and will include improvements to the public realm at Brookfield Road.
- New balconies overlooking South Circular Road homes will be screened for privacy
- A vibration monitor will be placed in local homes during the construction phase to detect any structural changes, which will then be used to ensure that any possible damage is repaired, and a condition survey has been offered to residents living in close proximity to the new children's hospital.
- Congestion worries will be addressed by ensuring construction workers park at the Red Cow and use the LUAS to travel to work
- Construction traffic will not be allowed park in the area, but will be kept at a holding zone on Davitt Road and called to the site on a 'just in time' basis.

## 9.5 Hospitals, Clinical and User Group Consultations

In addition and as detailed in the Engagement Process Report prepared by the NPHDB and the Children's Hospital Group, there have been a range of detailed consultations with hospitals, clinical and user groups. These are detailed in the attached report.



## 10. Site Contexts

This Section outlines the context of each of the development sites and describes the characteristics of the sites themselves.

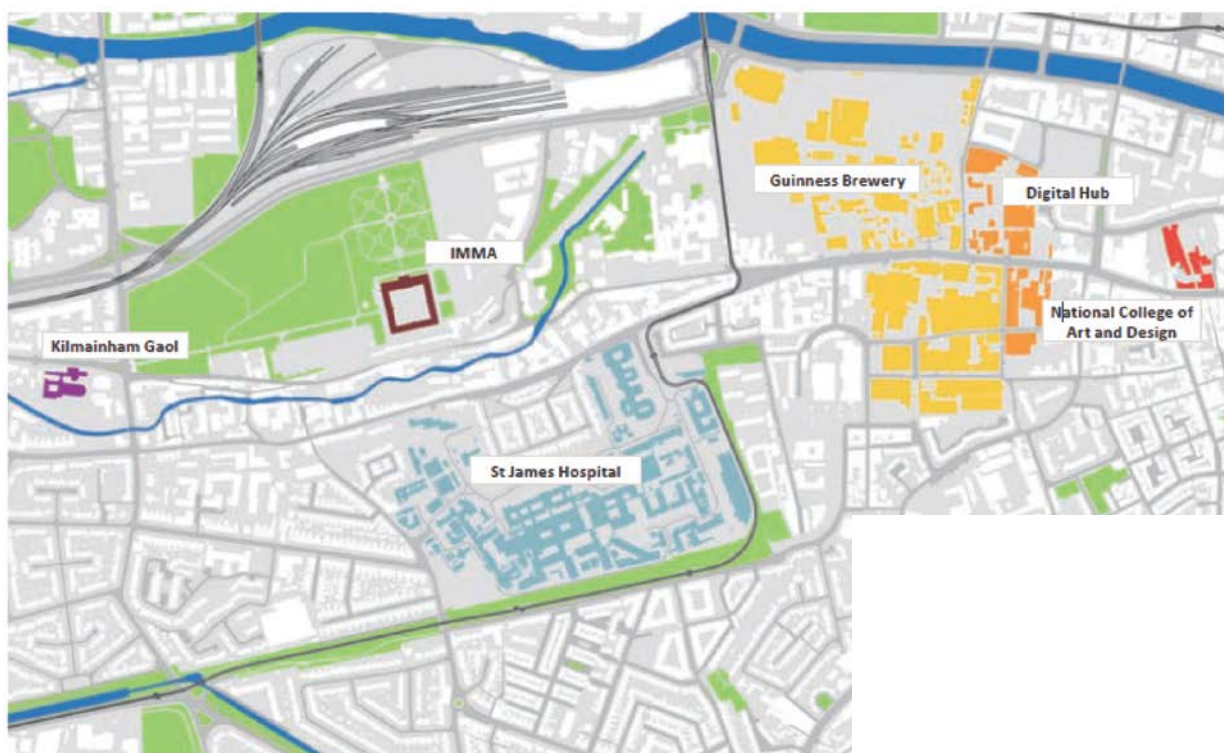
### 10.1 Urban Context

#### 10.1.1 St. James's Hospital Campus

St. James's Hospital campus is located in Dublin's west inner city, c. 2.5km from College Green in the city centre. The Campus developed by the blending together of different traditions going back to 1727 when the founding hospital opened on the site. The Campus occupies a site extending to c.19.48ha

The area surrounding St. James's Hospital campus has a rich history and is home to the Guinness Brewery at St James and the Royal Hospital Kilmainham, which is now home to the Irish Museum of Modern Art and Kilmainham Gaol. This history leaves a legacy of fine buildings and a number of significant attractions that draw visitors to the area, see Plate 1 below. However, these attractions are set amongst the many other uses accommodated in, and typical of, such an inner city location. These uses include *inter alia* residential in the form of traditional streets, newer residential provided in estates and mixed-use developments, offices, hotels, key infrastructure for the City i.e. Heuston Station, pockets of industry and brownfield and underutilised areas.

**Plate 1 Urban Context – Major Institutions and Anchors surrounding St. James's Hospital Campus<sup>4</sup>**



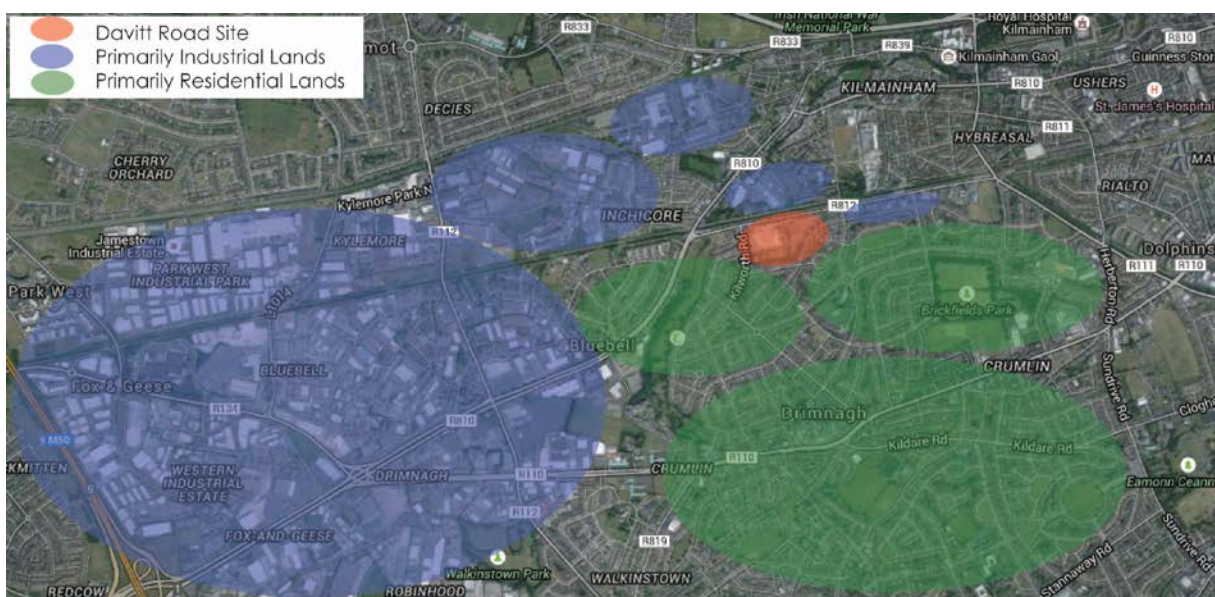
<sup>4</sup> Image is taken from the Urban Initiatives document "National Paediatric Hospital – Local Regeneration Opportunities", 2015, pg. 17.

The Davitt Road site, which will act as a construction compound for St. James's Hospital campus during the construction stage of the new children's hospital, is located c.1.6km southwest of St. James's Hospital campus. While the lands immediately adjoining the site are characterised by established residential estates the area itself could be described as transitional in nature. The site has been cleared pending re-use.

As outlined in the Architecture and Cultural Heritage Section of the EIS there is a history of industry in the area around Davitt Road. This is still visible to the east of the site where low density, industrial warehouse type units front Davitt Road between its junction with Benbulbin Road and Sperrin Road. The industrial nature of this area remains visible and active to the west and north with numerous industrial estates such as inter alia Jamestown Business Park, the Bluebell Industrial Estate and industrial areas on the Nass Road all still operating from this location inside the M50.

Plate 2 below puts the site in the context of the surrounding landuses and highlights the distinct difference in the lands uses to the south east and to the west, south west. In this regard and as discussed below the subject site was part of the industrial uses fronting Davitt Road, formerly occupied by Unilever and Blindcraft.

**Plate 2 Urban Context of the Davitt Road Site**



### 10.1.2 Tallaght Hospital Campus

The proposed development site is located just south/south east of the townland boundary between Cookstown and Tallaght and is within c.750m of Tallaght village, located to the south east. Since the 1960's Tallaght has grown from a village to become the County Town for South Dublin. The increase in scale in terms of population growth was not initially matched by the provision of a range of facilities, with the Square Shopping Centre not opening until 1990. Prior to this the majority of sites in the Town Centre had been developed as large individual 'shed' type buildings, set back from adjoining roads, with surface car parking. However, in recent years the development of the High Street area sought to move away from this form of development towards a more traditional urban street format<sup>5</sup>.

<sup>5</sup> Tallaght Town Centre Local Area Plan, 2006/2011, pg. 15



Tallaght Hospital was developed in the mid 1990's and as shown on Plate 3 below is in a transitional area between the Town Centre to the south, the large scale Cookstown Industrial Estate to the north and north east and the residential area of Springfield to the west. The provision of the LUAS Red Line in 2004 serving the City Centre has increased accessibility to Tallaght Town Centre, the Hospital and to the surrounding area.

**Plate 3 Urban Context of Tallaght Hospital Campus**



### 10.1.3 Connolly Hospital Campus

Connolly Hospital is located within the former Sheephill demesne, close to the River Tolka, which flows along the southern demesne boundary. It is c.580m to the east, north east of Blanchardstown Village. The N3 however, acts as a natural barrier between the Village and the Hospital.

There is a notable difference in the character of the lands to the east and west of the N3. The lands to the west are developed and urbanised, containing Blanchardstown Village and surrounding residential areas while the lands to the east are characterised by open space and high amenity areas. In this regard the hospital is isolated from the facilities offered to the west being almost completely surrounded by open space bar an area of modern residential development to the north.

Plate 4: Urban Context of Connolly Hospital Campus



## 10.2 Description of the Sites and Surroundings

As discussed in Section 6 above, the National Paediatric Hospital development comprises of six interrelated elements on four sites at St. James's Hospital campus, Davitt Road, a site at Tallaght Hospital and a site at Connolly Hospital. Each site and its surrounding context are addressed in turn below.

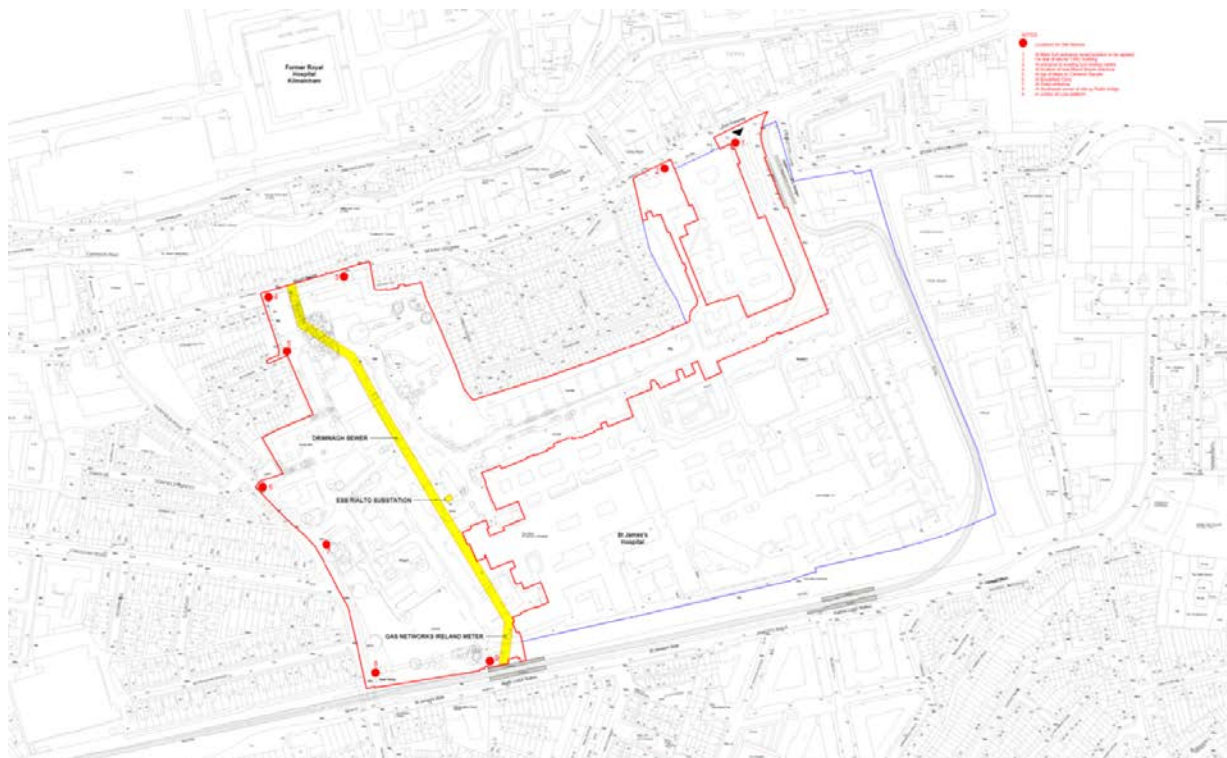
### 10.2.1 St. James's Hospital Campus

St. James's Hospital campus extends to almost 19.48 hectares set within the mixed-use urban context of Rialto / Kilmainham, Dublin 8 (note: the application boundary measures some 8.7ha within this overall site). The Campus is broadly 'U-shaped' bounded to the north by James's Street and Mount Brown – and internally within the 'U-shape' by the established residential area of Ceannt Fort and in particular by the residential streets of O'Reilly Avenue, Donnellan Avenue, and McDowell Avenue. The Campus is bounded to the south by the LUAS Red Line and associated public linear park, and immediately south thereof by primarily residential properties located along the south side of James's Walk.

The campus is bounded to the west by the South Circular Road and Brookfield Road including the residential area of Cameron Square; and to the east by the Red LUAS line and the rear of various mixed-use and residential properties, including the Basin Street Flats and the Mater Dei National School. The extent of the application site in the context of the overall campus is set out in Plate 5 below.



### Plate 5: Urban Context St. James's Campus Site



Note: Drawing not to scale, please refer to application documentation. Red dots indicate the locations of the site notices.

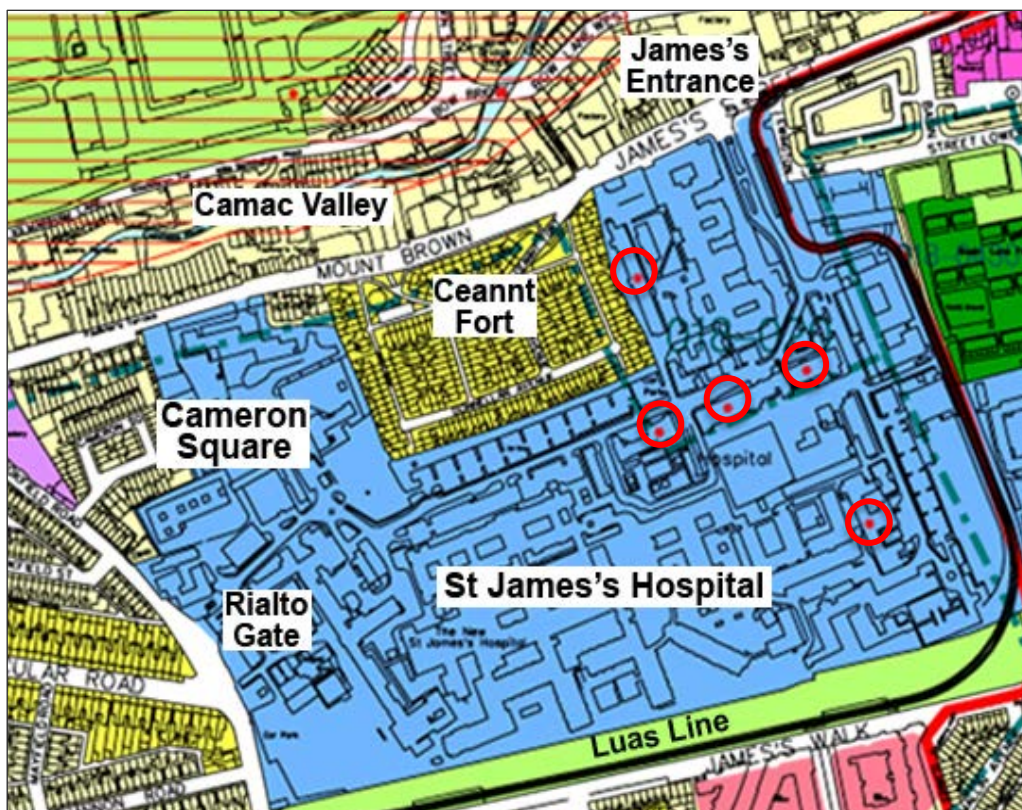
The Campus presents a relatively 'closed' block within its urban context, with access limited to the two principal hospital entrances: one at the northeast corner off James's Street, and second (the Rialto gate) on the western boundary at the junction of South Circular Road and Brookfield Road. These two entrances are connected by a central east-west road which serves the overall campus. At present the hospital buildings – which illustrate the many changing styles of architecture and construction over a long period of time – are distributed to either side of this central road with the majority of the campus set to the south.

Hospital and related uses have existed on the site of St. James's Hospital since the establishment of a Foundling Hospital in 1730. The site, and indeed what was then rural surrounds, have undergone considerable change and development over the centuries, including been integrated within an expanding city in the early 20th Century. While a detailed history of development on the site down the centuries is set out in Chapter 15 Archaeology and Chapter 16 Architectural Heritage of the EIS, it is noted that there are five protected structures (Ref. 4011 Dublin City Council Record of Protected Structures) on the St. James's Hospital campus:

- three-storey building annexe on the western boundary, to the rear of McDowell Avenue;
- Chief Executive Office: stone and brick institutional building;
- Hospital 1: 19th century stone and brick hospital building;
- Hospital 2: stone hospital building;
- Hospital 4: stone hospital building and mid-20th century service blocks and central entrance feature.

All of the protected structures are located to the northeast/centre of the hospital campus. These are set out in 6 below.

**Plate 6: Extract from Dublin City Development Plan 2011-2017 Showing Protected Structures (circled asterisks)**



The main hospital complex as seen today, was constructed in the 1980's and 1990's. Given its surrounding context and growth over the years, the hospital is considered to be 'urban' in character. There are no significant areas of open space within the site and such space where it arises is under roads, car parks and storage areas that are ancillary to the hospital buildings and functions. The campus is located directly adjacent to a linear park to the south that accommodates the Luas Red Line (please see Plate 6 above). The Campus, however, does not currently open out onto this green space, although the Mercer's Institute for Successful Ageing (MISA) building (currently under construction) proposes a pedestrian gate onto the park.

With the notable exception of the MISA building under construction, the existing hospital is a predominantly low rise campus with buildings ranging from one to four stories in height (overall existing heights set out in Plate 7 below). However, the hospital is an ever evolving campus and elements are continually being upgraded and redeveloped.

Plate 7: St. James's Campus Site Existing Building Heights

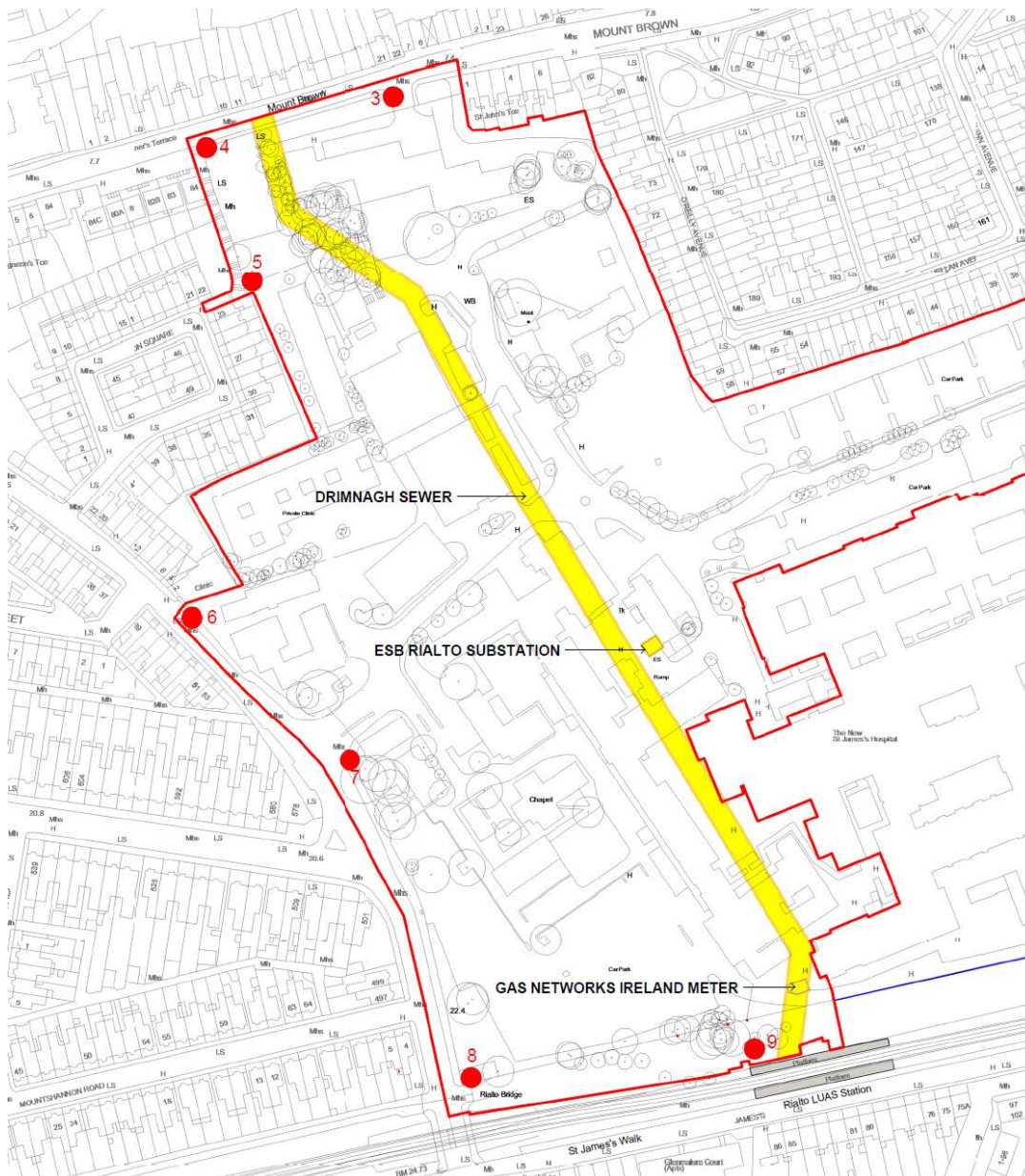


### 10.2.2 New Children's Hospital Site at St. James's Hospital Campus

The lands on St. James's Hospital campus on which it is proposed to build the new children's hospital and Family Accommodation Unit measure c.4.85ha and are located at the western end of the overall hospital complex. To the east and south east, the site is bound by existing hospital buildings associated with St. James's Hospital, by the main internal hospital road which provides access from James's Street and by surface car parking associated with the existing adult hospital. To the north/north east the site is bound by the rear gardens of the dwellings on O'Reilly Avenue and a row of dwellings at St. John's Terrace which front Mount Brown. The remainder of the northern boundary has frontage onto Mount Brown. The site's location is set out in Plate 8 overleaf.



Plate 8: St. James's Campus – New Children's Hospital Site



Note: Extract from Site Location Map. Drawing not to scale, please refer to application documentation. Red dots indicate the locations of the site notices.

The site is bound to the south west/west, and has frontage onto, South Circular Road and Brookfield Road, with an existing, restricted, access into the site from Brookfield Road. While the site has frontage onto South Circular Road, currently this boundary is defined by a concrete and dashed wall c. 2m high. The rear gardens of the residential dwellings on Cameron Square bound the site to the north west. The site is bounded to the south by the linear park that is traversed by the LUAS Red Line, which runs parallel to St. James Walk.

The site is currently in use as part of St. James's Hospital, with the following buildings located on the site:

- Hospital 7
- Rheumatology Day Centre
- General Support Services
- Veins Unit
- Physiotherapy Department
- Speech and Language Therapy
- Hepatology Centre
- Private Clinic
- Chapel (described in detail in Chapter 16)
- Information and Management Services
- Technical Services
- Medical Gases
- Ambulance Centre
- Garden Hill House (housing Medical Physics and Clinical Engineering)
- Laundry Services
- Material Management
- Boiler / Plant Room<sup>6</sup>

An area in the southern part of the site is currently undeveloped and is in use as a surface car park. The site also includes the energy centre, located in the northern part of the site and fronting Mount Brown / Faulkner Terrace. This building will remain in place although it is proposed to replace the existing flue stack.

There are a number of trees on the western, northern and southern boundaries of the site. Ground levels are relatively consistent within the site, while levels to South Circular Road rise to the south along the site frontage toward Rialto Bridge, up to c.3m in difference at this point. Ground levels in James's Walk linear park to the south are also very slightly elevated above levels on the site while there is a significant change in level between the site and Mount Brown to the north with the levels falling from the site to the road by c.13m south to north. The Driminagh sewer traverses the site and is to be relocated as part of this application.

The site is exceptionally well served by all of the principal modes of transportation. Firstly, the site is directly accessible from three stops on the red LUAS line with a stop at Rialto, located immediately south of the children's hospital site. The LUAS provides direct links to the public transportation hubs at Heuston and Connolly stations and also with the Park and Ride facility at the Red Cow, adjacent to the M50 / N7 interchange. The site is also served by a number of Dublin Bus routes along James's Street and South Circular Road and by the 123 which traverses the hospital campus.

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<sup>6</sup> Note, the application red line incorporates two other buildings not on the site above, the Orthodontic Department and Anaesthetic Dental Clinic, both of which it is propose to demolish as part of the overall improvement works to the campus.

### 10.2.3 Family Accommodation Unit Site

The Family Accommodation Unit is to be located to the west of the new children's hospital. The site currently accommodates the National Centre for Hereditary Coagulation Disorders, the Medical Information Centre and part of the Private Clinic. The site is on the corner of, and has frontage onto, Brookfield Road to the west and the existing restricted hospital entrance from South Circular Road/ Brookfield Road to the south. The site is bound to the west by Brookfield Clinic which is associated with the existing adult hospital and to the north/north west by the rear gardens of residential dwellings on Cameron Square. The east of the site is currently defined by buildings associated with St. James's Hospital including information management services.

At present there are a number of trees on site, including those located on the northern and north western boundaries, to the rear of the properties on Cameron Square and Brookfield Road respectively. Ground levels across the site, with Cameron Square to the north and Brookfield Road to the west are relatively consistent.

### 10.2.4 Children's Research and Innovation Centre Site

The site of the Children's Research and Innovation Centre measures approximately 0.14ha and is located in the north eastern part of the overall St. James's Hospital campus, separate from the site of the new children's hospital. The site is located immediately west of the Trinity Centre for Health Sciences and currently consists of a surface car park and hard standing area associated with the hospital and the retained façade of a 19th century building to the north.

There is a notable level change across the site, which falls from the open space area to the south down towards James's Street to the north by c.3m. Levels reduce across the site to the west, with the rear gardens of the properties on Ceannt Fort located c.4m below the levels of the site. There are a number of mature trees located along the footpath with James's Street, immediately north of the sites boundary wall.

The site is bound by a limestone wall to the west which separates the lands from the rear gardens of the residential dwellings on Ceannt Fort. The Haughton Institute, a mid-19th century protected structure, bounds the site to the south west, orientated in a north-south direction. Directly south of the site is an open-space with mature trees. The site is bound to the north and has frontage onto James's Street, however, this boundary is currently defined by a high limestone wall.

### 10.2.5 Davitt Road Construction Compound Site

The site which is to act as a construction compound for the development at the St. James's Hospital campus, is located on Davitt Road, Drimnagh, Dublin 12, c.1.6km to the southwest of St. James's Hospital. It is a brownfield site, formerly occupied by Unilever but is now owned by the Health Service Executive. The site measures c.1.29ha in total area (to accommodate a compound measuring 0.8ha) and is located immediately south of Davitt Road but is separated from it by a wayleave which traverses the northern boundary of the site.

As the compound site is set within the overall Health Service Executive site it is bound to the west by the site of the recently permitted ambulance base (Reg. Ref. 2309/15) and to the east and south by undeveloped lands that are in the ownership of the HSE. The Framework Plan submitted with the ambulance base application (Reg. Ref. 2309/15) acknowledges the potential for a site compound on the existing site for other HSE related construction activities.

The site had until recently housed industrial / production / storage facilities for Unilever, however, these have subsequently been demolished leaving a “brownfield” site. The site is accessible from Davitt Road via an existing access. The residual land is open and relatively flat with a mounded bank of earth / debris / spoil located centrally adjacent to the main eastern access point on the northern boundary.

#### 10.2.6 Children’s Hospital Satellite Centre Site - Tallaght

What is known as the Tallaght Hospital campus is located immediately north of Tallaght Town Centre. The Campus is accessible from Belgard Square North to the south, with Cookstown Way and the LUAS red line bounding the campus to the west. The internal hospital road runs proximate to the eastern boundary to the east of the existing hospital complex, connecting with and providing access from the industrial estate at Fourth Avenue to the east. The area to the north of the Campus is also industrial in nature. Exchange Hall, a mixed-use office and residential development fronts Belgard Square North to the south of the campus.

The children’s hospital satellite centre will form an extension to the existing hospital and will be located immediately east of the hospital, south east of the main entrance on a site of 1.04ha. The new building will be located on a triangular shaped green space, bound to the north, south and east by internal hospital roads. The development will also incorporate a small portion of the internal road and car park to the south. The site is relatively flat and being located to the west of the main internal hospital road is removed from the surrounding uses to the east.

#### 10.2.7 Children’s Hospital Satellite Centre Site - Connolly

The Connolly Hospital campus is separated from the urban area of Blanchardstown, being located north of the Navan Road (N3) and separated from it by a band of dense woodland along the banks of the River Tolka, and bound to the south, east and west by high amenity areas and open space and recreational areas. The Campus is bound to the north by a residential development and is accessible from the Navan Road (N3), with limited accessibility by public transportation. The hospital road runs along the perimeter of the Campus, forming a natural boundary with the adjacent areas.

The proposed children’s hospital satellite centre site measures 1.25ha and is located south of the hospital, immediately east of the main hospital entrance. The site is largely rectangular in shape, with its southern and western boundaries defined by hospital roads. To the east the site is bound by green space which separates it from the hospital road. Levels vary across the site with a low point centrally. There is a slight rise in level from the hospital road to the south up to the existing hospital. Given the sites location within the campus, adjacent to the existing hospital, it is removed from the surrounding high amenity areas.

Within the hospital grounds the landscape has retained some of the mature planting associated with the former demesne. However, the area immediate surrounding the subject site is devoid of such planting being dominated by the large hospital complex to the north and west and the large surface car parks to the south.



## 11. Planning History

### 11.1 Description of the Sites and Surroundings

As the proposed development covers 4 no. sites, including 3 no. separate locations on St. James's Hospital campus, there is an extensive planning history associated with this application. The history of each site is listed below, with relevant planning permissions identified and discussed separately.

The planning history in relation to St. James's Hospital campus, Tallaght Hospital campus and Connolly Hospital campus all demonstrate a long established and on-going hospital use on these sites. In addition, the relatively regular applications for expansions and upgrades to the hospitals show a clear intent to continue and improve the services provided at these locations.

### 11.2 St. James's Hospital Campus

Three elements of the proposed development will be located on St. James's Hospital campus, the new children's hospital, the Family Accommodation Unit and the Children's Research and Innovation Centre. Over the past 18 years there have been a significant number of applications on St. James's Hospital campus, a large number of which have been for relatively minor extensions to the existing hospital. A long list chronological planning history is provided in Appendix 3.1 of the EIS.

Of these applications three recent permissions are relevant and warrant consideration in terms of *inter alia* the nature of the development sought, the scale of the facility, the approach to the design, the precedent set, as follows:

#### Dublin City Council Reg. Ref. 2751/09, Board Ref. 236070

Date of Permission: Signed by An Bord Pleanála on 24/06/2010

Description: Demolition of existing structures on site including *inter alia* **the chapel building** and the construction of an **eight storey Private Hospital** totalling 29,644m<sup>2</sup> over two levels of basement car parking (18,010m<sup>2</sup>) with *inter alia* a 670m<sup>2</sup> recessed plant room at roof level, a 47m<sup>2</sup> single storey block on the south west corner of the site to accommodate a new oxygen tank and supporting plant and the provision of a landscaped garden together with steps, paving and seating within the adjoining Linear Park to the south as part of the transition from Linear Park to the Hospital entrance plaza.

- The application included the provision of the following clinical facilities:
- 3 no. 48 bed and 1 no. 52 bed wards, totalling 196 acute beds.
- 62 no. day beds, including 40 no. day procedure recliners, 6 no. dialysis recliners and 16 no. chemotherapy recliners
- Haematology oncology day facility
- 18 no. outpatient rooms

- Associated facilities including physiotherapy, OT, nutrition, speech and language and pharmacy
- Diagnostic facilities
- 8 no. operating theatres
- 3 no. angiograph laboratories
- Endoscopy suite

This permission is of particular note as the site to which it relates forms part of the site of the new children's hospital. In this regard it sets a precedent for the development of the south west of St. James's Hospital campus and addresses planning items such as the demolition of the chapel, height, scale and massing and interaction with South Circular Road. Although permitted by Dublin City Council under a previous Development Plan, the surrounding context has remained relatively unaltered and therefore, this application forms a relevant point of reference for development of the site of the new children's hospital.

#### Dublin City Council Reg. Ref. 3607/12

Date of Permission: Final Grant dated 27/03/2013

Description: The development will consist of the construction of a new facility for the Mercer's Institute for Successful Ageing on an approximately 0.88 hectare site in the southern part of the hospital site bounded by the open space known as St. James's Linear Park. parallel to St. James's Walk to the south comprising: The demolition of a two-storey red brick former Matron's facility; 185 sqm. single storey temporary structures (doctor's on-call accommodation building: 500 sqm); a single storey conservatory (northern elevation of Hospital 5: 40sqm); and a portion of the western part of a two storey hospital building (Hospital 5: 240sqm) with combined total of 965 sqm.; The construction of a part two, part four and **part seven storey hospital building** (28 metres high to roof level; 30.85 metres to top of roof of access lobby on part of roof) totalling 15,018sqm providing clinical facilities and clinical support facilities at ground and first floors; 124 no. bed ward accommodation on second to seventh floors; research facilities and offices of the Mercer's Institute and administrative office and support services accommodation; incorporating roof terraces at second, third, fourth, fifth and sixth floors on the southern elevation and at second floor on part of the northern elevation of the building; and the construction of a single storey pedestrian corridor and ancillary accommodation structure at ground level linking the proposed facility and the main hospital concourse; The provision of the first phase of a landscaped plaza together with a set down and drop off area, disabled parking, steps, paving and seating and pedestrian link to the adjoining Linear Park to the south (located adjacent to Fatima LUAS stop); All other site development works above and below ground required to facilitate the development including internal circulation routes, pedestrian walkways, hard and soft landscaping and lighting.

This permission is relevant to the subject application, being a recent permission for a new hospital building to the south of St. James's Hospital campus, adjacent to the linear park and hence a similar location to the new children's hospital. Key planning issues such as height, visual impact and visual amenities were addressed by Dublin City Council as part of this application; issues that will be material to the subject application.

**Dublin City Council Reg. Ref. 3325/13**

Date of Permission: Final Grant dated 15/01/2014

Description: For development on a c. 0.1993 hectare site at St. James's Hospital, James's Street, Dublin 8 to the east of existing cardiac ward block in the southern part of the hospital site bounded by the open space known as St. James's Linear Park, parallel to St. James's Walk to the south. The development will consist of the demolition of existing recycling centre storage sheds and associated ancillary works and the construction of a new seven storey Clinical Directorates Building (27.87 metres high to top of roof plant level) totalling 4,953 sq.m providing staff facilities at ground and first floors; clinical facilities and clinical support facilities at second floor; offices at third, fifth and sixth floors; and offices and staff training facilities at fourth floor; an enclosed plant area (including stair core and lift access) on the roof; enclosed pedestrian corridor linking the proposed building and the main hospital concourse at first and second floor levels; the construction of 3 no. single storey cycle parking shelters; all other site development works above and below ground required to facilitate the development.

As with Reg. Ref. 3607/12, this permission is relevant to the subject application as it is a recent permission for a new hospital building to the south of St. James's Hospital campus, adjacent to the linear park. Key planning issues such as height, visual impact, massing and the principle of development were addressed by Dublin City Council as part of this application.

**11.3 Davitt Road**

The Davitt Road site previously accommodated industrial/production/storage facilities for Unilever. The limited available planning history is provided in Chapter 3 of the EIS.

The most recent application was for an ambulance base (Reg.Ref 2309/15) which was granted by Dublin City Council in June 2015. This application reflects the recent acquisition of the site by the Health Service Executive and shows the intent to use the site for medical related services as outlined with the Framework Plan submitted with the application. This Plan recognised the potential to use part of the site as a support storage compound to assist other healthcare related works in the short-term.

## 11.4 Tallaght Hospital Campus

There have been 24 no. applications on Tallaght Hospital campus since 1994. The majority of the applications have been for minor works or small scale extensions to the hospital, often in the form of temporary structures. A chronological list of applications is provided in Chapter 3 of the EIS.

The most recent application on site (Reg. Ref. SD15A/0122), which was refused by South Dublin County Council on 26/06/2015, sought permission for telecommunications antennas and associated ancillary equipment which was not related to the hospital use.

## 11.5 Connolly Hospital Campus

Connolly Hospital campus has been the subject of 22 planning applications since 1994. The applications were for various works including teaching facilities within the hospital and also access arrangement to the hospital, as well as extensions to the hospital itself. A chronological list of applications is provided in Chapter 3 of the EIS.

The most recent application on site sought the retention of a temporary waste management facility (Reg. Ref. FW14A/0092). It was deemed withdrawn following a request for further information.

## 12. Strategic Planning and Policy Context

The below provides the strategic planning and policy context relating to the National Paediatric Hospital development. The relevant authority, in this case An Bord Pleanála, in its decision making is generally required to have regard to the provisions and guidance of statutory plans such as the National Spatial Strategy, Regional Planning Guidelines, Development Plans and Local Area Plans. While other non-statutory plans can inform the decision making process the relevant authority is not bound by their provisions. Under Section 143 of the Act, the Board are also required to have regard to, inter alia, the policies and objectives for the time being of the Government, a State Authority, the Minister whose functions have, or may have, a bearing on proper planning and sustainable development.

The purpose of the Development Plan is to guide development in the administrative area of the Local Authority to which it relates, with Local Area Plans setting out plans and policies for the development and use of land in a local area in the jurisdiction. However, the Board in making a decision in relation to strategic infrastructure development is not bound by the provisions of these statutory plans, with Section 37G(2)(c) of the Planning and Development Act, 2000 (as amended) stating that:

*“Without prejudice to the generality of subsection (1), the Board shall consider—  
the provisions of the development plan or plans for the area,”* (Emphasis added)

The provisions of the development plan or plans for the area is but one of a list of items which the Board shall consider in making its decision, as outlined in Section 37G(2)(c). While the Board must consider these items the wording of Section 37G(2)(c) is non-prescriptive and does not bind the Board to the provisions of these Plans.

The relevant strategic planning and policy context, including health policy context, is set out below from the national to the local level.

### 12.1 Statutory Planning Policy Framework – National Level

#### 12.1.1 National Development Plan, 2007 - 2013

The National Development Plan, 2007-2013, although now out-dated, sought to prioritise and deliver health capital investment over its lifetime<sup>7</sup>. It provided for investment in social infrastructure, underlining the commitment to the fair and equitable redistribution of the fruits of economic success among all sections of the community. It stated that the total investment in this priority area of over €33 billion will complement the investment in Social Inclusion under Priority V to greatly enhance social development<sup>8</sup>.

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<sup>7</sup> National Development Plan, 2007-2013, pg. 214.

<sup>8</sup> National Development Plan, 2007-2013, pg. 21.

This investment was to include just under €5 billion on health infrastructure, acute hospitals and primary community and continuing care facilities, with €2.4 billion proposed for acute Hospital Care<sup>9</sup>. At the time of the drafting and adopting of the NDP it was noted that funding would be available to build a new independent national tertiary paediatric centre on a site to be made available by the Mater Hospital in Dublin<sup>10</sup>. While such a site was brought forward within the lifetime of the National Development Plan it did not achieve planning permission.

### 12.1.2 National Spatial Strategy, 2002 – 2020

The National Spatial Strategy under Section 3.7 “Key Infrastructure” states that ‘achieving spatial balance by developing the potential of areas will depend on enhancing capacity for the movement of people, goods, energy and information between different places. Improvements in terms of time and cost, can reduce the disadvantages of distance<sup>11</sup>’. In this regard the National Spatial Strategy states that ‘economic infrastructure, such as water services and waste, and social infrastructure, such as schools and hospitals, relate to particular locations and are also needed to support balanced regional development<sup>12</sup>’. This principle formed part of the development of the gateway and hub approach adopted by the Strategy.

## 12.2 Supplementary Policy Framework – National Level

### 12.2.1 National Model of Care for Paediatric Healthcare in Ireland, 2010

In 2010, the NPHDB published the National Model of Care for Paediatric Healthcare in Ireland. Informed by the extensive research into international best practice, trends in paediatric healthcare and contemporary changes in healthcare the decision was made to develop the ‘hub and spoke’ model of a main National Tertiary Hospital with satellite centres, also referred to as Urgent Care Centres. The satellite centres were identified as having a crucial role as projected patient numbers to the three Dublin Hospitals by 2021 of 120,000 would have been well in excess of the internationally accepted manageable figure for a single department of 80,000 patients. At the time, the Model of Care envisaged ambulatory care being provided at the children’s hospital on the Mater site, at the Ambulatory & Urgent Care Centre in Tallaght and at regional and local hospitals throughout Ireland.

The Model of Care required a shift, where appropriate, from inpatient care to ambulatory or short stay care, and from hospital-centred care to home-based care. Inpatient care should be reserved for those children with acute severe illnesses and chronic complex conditions. A key principle of the Model is that the satellite centres will be an integral part of, and come under the governance of, the new children’s hospital. These will provide services and environments of the same quality as those delivered in the new children’s hospital and staff working in the children’s hospital satellite centres will rotate through the main hospital.

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<sup>9</sup> National Development Plan, 2007-2013, pg. 216.

<sup>10</sup> National Development Plan, 2007-2013, pg. 217.

<sup>11</sup> National Spatial Strategy, 2002 – 2020, pg. 56.

<sup>12</sup> National Spatial Strategy, 2002 – 2020, pg. 56.

This configuration improves geographic access to urgent care for a significant number of children in the Greater Dublin Area, supports primary and community care paediatrics, reduces outpatient attendance on the main site and significantly reduces emergency department attendance on the main site. Children and young people seen in the satellite centres who require urgent care will be transferred to the inpatient unit at the main new children's hospital, a figure which is estimated to be c. 8% of attendees. Children and young people who present at a children's hospital satellite centre and are deemed to be critically ill will be stabilised and transferred to the national paediatric critical unit.

### 12.2.2 The National Clinical Programme for Paediatrics and Neonatology, 2011

The National Clinical Programme for Paediatrics and Neonatology was established in 2011 as a joint clinical initiative between the Health Service Executive and the Faculty of Paediatrics, Royal College of Physicians Ireland. The overall aim of the programme is to ensure high quality care is provided to children throughout Ireland, from the point of first contact. The objectives of the programme are focused on the areas of quality, access and value as follows:

**Table 7 Objectives of National Clinical Programme for Paediatrics and Neonatology**

Quality	<p>Ensure high quality standards of care are provided in all paediatric and neonatal units nationally through the development of a model of care for paediatrics and neonatology</p> <p>Implement a National Paediatric Early Warning Score</p> <p>Develop guidelines and algorithms to help standardise clinical care nationally</p>
Access	<p>Extend the National Neonatal Transport Programme to a 24/7 service, and implement an efficient retrotransfer programme</p> <p>Introduce a dedicated paediatric emergency transport service</p> <p>Ensure all infants have rapid and equal access to neonatal intensive care and surgical treatment irrespective of geographical location</p> <p>Reduce outpatient appointment wait times</p> <p>Ensure access to insulin pump therapy for all children under 5 with type 1 diabetes</p>
Value	<p>Eliminate duplication and fragmentation in the provision of specialist newborn intensive care services</p> <p>Ensure all care is provided in the right setting, by the most appropriate clinician</p> <p>Maintain child health through appropriate preventative initiatives: Screening, Nutrition and Immunisation.</p> <p>Reduce HbA1c levels in children and adolescents with diabetes, thereby reducing long-term complications and adult healthcare utilisation</p>

### 12.2.3 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland, 2009-2020

This document published by the now Department of Transport, Tourism and Sport sets out the vision of a sustainable transport future in 2020. It identifies measures aiming to increase the share of the population walking, cycling and using public transport by 2020. Through this framework, the Government aims to reduce the car-based share of total commuting trips from the current average of 65% to 45%. The fundamental objective underpinning this policy document is the provision of a high quality, integrated and sustainable travel and transport infrastructure that supports the movement of goods and people, which will ensure continued Irish competitiveness. This translates into goals, actions and objectives seeking to ensure the availability of sustainable transport alternatives to the majority of the population.

#### 12.2.4 National Cycle Policy Framework, 2009

The National Cycle Policy Framework (as part of Smarter Travel – A Sustainable Transport Future 2009) outlines national policy for cycling, in order to create a stronger cycling society and a friendlier environment for cycling. The policy document sets an average national target of 10% of all trips by bicycle by 2020 and equally recognises the need for continuing promotion and integration of cycle networks in the State.

#### 12.2.5 Our Sustainable Future, A Framework for Sustainable Development in Ireland, 2012

Our Sustainable Future sets out the challenges facing Ireland and how we can address them in making sure that the quality of life and general well-being of our society can be improved and sustained in the decades to come. It puts in place a medium to long-term framework for advancing sustainable development and the green economy in Ireland. The priorities for action cut across many of the key challenges and include ‘an effective framework for transition to an innovative, low-carbon and resource-efficient society<sup>13</sup>’.

### 12.3 Statutory Planning Policy Framework – Regional Level

#### 12.3.1 Regional Planning Guidelines for the Greater Dublin Area, 2010 – 2022

The Regional Planning Guidelines is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term and seeks to implement the strategic planning framework set out in the National Spatial Strategy<sup>14</sup>. It states that this is achieved through the appraisal of the critical elements involved in ensuring sustainable and good planning, and through the protection of sensitive and environmentally important locations. The settlement strategy for the Greater Dublin Area supports the delivery of the hierarchy, focusing new housing within the existing footprint of the metropolitan areas and planning expansion of the footprint in conjunction with new high quality public transport investment; designation of multi-modal transport corridors providing enhanced public transport linkages serving key towns and linked investment in developing these designated towns in the hinterland area<sup>15</sup>.

The Core Principles of the Strategy Vision for the Regional Planning Guidelines include *inter alia*:

*“Development within the existing urban footprint of the Metropolitan Area will be consolidated to achieve a more compact urban form, allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike; and,*

*Development in the GDA shall be directly related to investment in integrated high quality public transport services and focused on compact urban form.”*

With regards to economic policy, strategic policy EP1 states that:

<sup>13</sup> Our Sustainable Future, A Framework for Sustainable Development for Ireland, 2012, pg. 23.

<sup>14</sup> Regional Planning Guidelines for the Greater Dublin Area, 2010-2022, pg. 2.

<sup>15</sup> Regional Planning Guidelines for the Greater Dublin Area, 2010-2022, pg. 5.



*“To seek sustainable economic growth across the GDA, by the promotion of identified core economic areas across the GDA in both the Dublin and Mid East Regions to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long distance commuting.”*

In regard to physical infrastructure it is a policy of the Regional Planning Guidelines that:

*“Future investment in transport in the GDA shall serve the needs of the GDA by: (i) providing efficient and effective and sustainable means of moving people and goods for business, family and leisure purposes which minimises the environmental impact and the social and economic cost to users; (ii) allows for the development of a land use strategy that supports sustainable development; and (iii) supports growth and efficiencies in economic activity for both the GDA and the State<sup>16</sup>”.*

Furthermore, there are a number of measures that are identified to direct and integrate land use with investment in public transport that include *inter alia*:

*“Focusing new development into sustainable compact urban areas served by high capacity and well developed public transport systems; and,*

*Promotion of higher densities for employment uses around public transport nodes<sup>17</sup>”*

The Regional Planning Guidelines under Section 8.6 deal with *“Health and Healthcare Facilities”* and state that *‘like the provision of educational facilities, healthcare is not a social service provided directly by Local Authorities, however, the provision of healthcare facilities must be taken into account in planning terms<sup>18</sup>’*. In this regard the Regional Planning Guidelines support close consultation between the Health Service Executive and Planning Authorities in the development management process with Policy SIR4 stating:

*‘planning authorities should work with the health services with regard to provision for community based primary care centres and hospital care in key population centres, supporting their integration into new and existing communities’.*

## **12.4 Supplementary Policy Framework – Regional Level**

### **12.4.1 Greater Dublin Area Draft Transport Strategy, 2011 – 2030**

This Draft Strategy outlined the strategic transport plan for the Greater Dublin Area for the period up to 2030. The purpose of the Strategy is to establish appropriate policies and transport measures that would support the Greater Dublin Area in meeting its potential as a competitive, sustainable city-region with a good quality of life for all. The Draft Strategy was, however, not formally adopted by the Department of Transport, Tourism and Sport. The National Transport Authority has since progressed with the preparation of the Integrated Implementation Plan, 2013 – 2018, see below.

<sup>16</sup> Regional Planning Guidelines for the Greater Dublin Area, 2010-2022, pg. 35.

<sup>17</sup> Regional Planning Guidelines for the Greater Dublin Area, 2010-2022, pg. 116.

<sup>18</sup> Regional Planning Guidelines for the Greater Dublin Area, 2010-2022, pg. 174.

## 12.4.2 Integrated Implementation Plan, 2013 - 2018

The Integrated Implementation Plan, 2013-2018 for the Greater Dublin Area, produced by the National Transport Authority, was adopted in 2013. It sets out the short term infrastructure investment programme for the Greater Dublin Area for a 5-year period up to 2018. It is an objective of the Plan to invest in the existing public transport modes to achieve a substantially greater modal shift from private car use to public transport over the period of the Plan.

## 12.4.3 Draft Greater Dublin Transport Strategy, 2015 – 2030

In the context of constrained funding, many of the proposed projects and objectives set out in the Greater Dublin Area Draft Transport Strategy, 2011 could not be delivered. As a result the National Transport Authority has commenced the preparation of a new Transport Strategy for the region to cover the period 2015 to 2035. A draft strategy is currently being prepared in accordance with Section 12 of the Dublin Transportation Act 2008. However no date has been agreed for public consultation on a preliminary draft of the strategy.

## 12.5 Statutory Planning Framework – Local Level

### 12.5.1 St. James's Hospital

#### 12.5.1.1 Dublin City Development Plan, 2011 - 2017

St. James's Hospital campus is located in the administrative area of Dublin City Council and therefore, the Dublin City Development Plan, 2011-2017, which came into effect on 22<sup>nd</sup> December 2010, is the relevant statutory plan<sup>19</sup>. The Dublin City Development Plan provides the local statutory planning policy for the City and is the principle document for guiding the development of the subject lands. In addition, the Davitt Road site which is a component of the strategic infrastructure development application is located within the administrative area of Dublin City Council. Please see section 12.5.1.3 below.

#### Zoning and Site Specific Objectives

The Dublin City Development Plan recognises a number of challenges relating to land use zoning including *inter alia* the need to ensure that there is an increase in the amount of resource lands available in the city given the capacity for an additional 67,000 residential units and to ensure that there is capacity to meet the needs of existing and future residential communities, in particular for schools, hospitals and recreational activities<sup>20</sup>. In addition, the Dublin City Development Plan states that land-use zoning must cater for the future economic development of the City and facilitate developments in the emerging sectors, such as, green technologies, biotechnology, health, IT, research, academic medical centres, and the provision of legal, insurance and financial services.

As shown on Plate 9 below the subject site is zoned Z15:

*"To protect and provide for institutional and community uses and to ensure that existing amenities are protected."*

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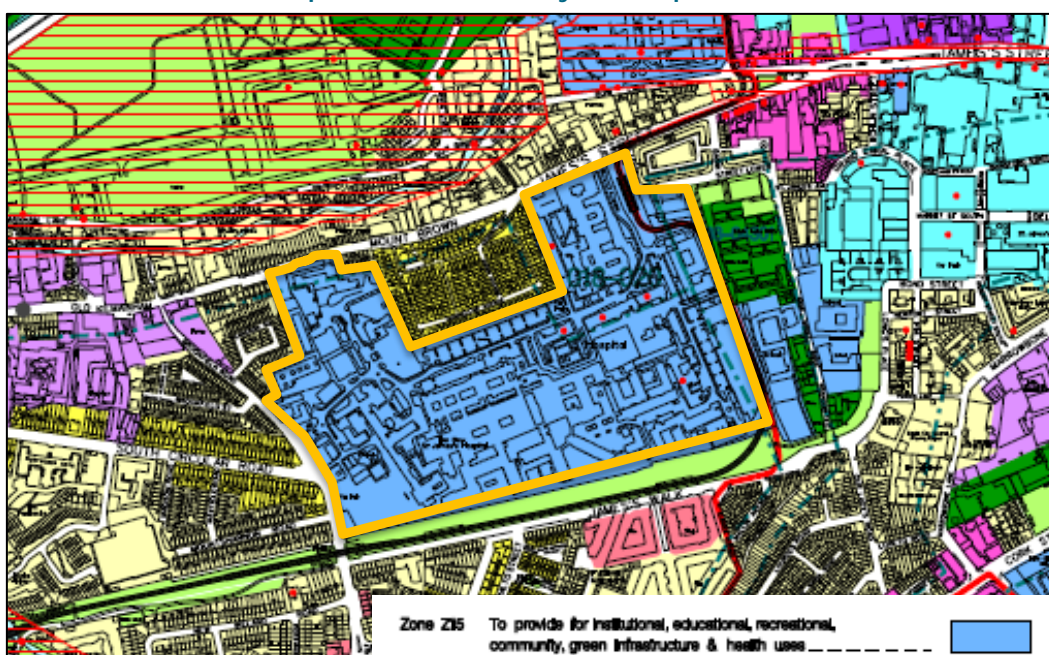
<sup>19</sup> We have accounted for the variation arising from the Judgment and Order of the High Court dated 27th April 2012 and 27<sup>th</sup> June 2012, respectively, in relation to the former Z15 Zoning in the CDP.

<sup>20</sup> Dublin City Development Plan, 2011 – 2017, pg. 189.

There is an emphasis on the importance of Z15 lands as a resource for the City in providing educational, recreational, community and health facilities and in the maintenance and creation of sustainable, vibrant neighbourhoods. Under this zoning 'buildings for the health, safety and welfare of the public, Medical and related consultants, Residential Institution and Education' are permitted in principle, with 'car park ancillary to main use' open for consideration. The family accommodation unit and the children's research and innovation centre are an integral component of the main institutional use of the lands and support the zoning objective.

The Dublin City Development Plan also states that with any development proposal on Z15 lands, consideration should be given to their potential to contribute to the development of a strategic green network.

**Plate 9: Extract from Map E of the Dublin City Development Plan, 2011 - 2017**



As indicated on Plate 9, St. James's Hospital campus contains 5 no. Protected Structures all located on the eastern part of the campus. These are referenced under number 4011 in the Record of Protected Structures, with sub references (a) to (e) as follows:

- (a) Three-storey building annex on western boundary, to rear of McDowell Avenue;
- (b) Chief Executive Officer: stone and brick institutional building;
- (c) Hospital 1: 19<sup>th</sup> century stone and brick hospital building;
- (d) Hospital 2: stone hospital building;
- (e) Hospital 4: stone hospital building and mid-20<sup>th</sup> century service blocks and central entrance feature.

## Surrounding Land Use Zonings

The St. James's Hospital Campus is located east of and accessible from South Circular Road/James's Street/Brookfield Road, its southern boundary is defined by a green route which accommodates the LUAS red line, Mount Brown Road/James Street and Basin Street Lower run to the north of the campus while the LUAS line largely defines the campus's eastern boundary.

The campus is rectangular in shape except for the Z2 zoned residential lands which bound the site to the north, the objective of which is *'to protect and/or improve the amenities of residential conservation areas'*. The site also immediately adjoins St. John's Terrace to the north and Cameron Square and St. Maignenns Terrace to the north west which are zoned Z1 *'to protect, provide and improve residential amenities'*.

In addition to the residentially zoned lands which directly adjoin the site Mary Aikenhead House is located to the north of Basin Street Lower and is zoned Z2 *'to protect and/or improve the amenities of residential conservation areas'*. There are also residentially zoned lands on the opposite side of South Circular Road with an area of Z1 zoned lands located north and south of the South Circular Road. The opposite side of Brookfield Road is also residential in nature, being zoned Z2, as are the dwellings on the southern side of Mountshannon Street, fronting South Circular Road to the east.

The land to the south of James Walk is predominantly zoned Z2, with an area zoned Z3 *'to provide for and improve neighbourhood facilities'*. The land to the east of the LUAS line is zoned Z15, *'to protect and provide for institutional and community uses and to ensure that existing amenities are protected'*, Z9 *'to preserve, provide and improve recreational amenity and open space and green networks'* and Z10 *'to consolidate and facilitate the development of inner city and inner suburban sites for mixed use development of which office, retail and residential would be the predominant uses'*.

In relation to Z2 zoned lands it is the policy of Dublin City Council to *'...protect the special character of the city's conservation areas through the application of the policies, standards and guiding principles on building heights<sup>21</sup>*, and to *'..protect and conserve the special interest and character of Architectural Conservation Areas and Conservation Areas in the development management process <sup>22</sup>*. The Dublin City Development Plan notes that it is important to avoid abrupt transitions in scale and use zones. In order to protect the amenities of residential properties the Dublin City Development Plan advises that *'in zones abutting residential areas or abutting residential development within predominately mixed-use zones, particular attention must be paid to the use, scale, density and design of development proposals and to landscaping and screening proposals...'* <sup>23</sup>.

There are no Protected Structures on any land that immediately adjoins the St James's Hospital campus.

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<sup>21</sup> Dublin City Development Plan, 2011 – 2017, pg. 119.

<sup>22</sup> Dublin City Development Plan, 2011 – 2017, pg. 119.

<sup>23</sup> Dublin City Development Plan, 2011 – 2017, pg. 192.

## Policy

The Core Strategy of the Dublin City Development Plan sets out key priorities that include *inter alia*: connecting and sustaining the city's infrastructure; making Dublin the heart of the Dublin Region; revitalising the city's economy; and, creating good neighbourhoods and successful communities<sup>24</sup>. To ensure effective delivery of the core strategy it is a central aim to consolidate and enhance the inner city and to enhance the links between the existing and emerging clusters in the city and to create synergies that extend along the innovation corridors.

While there is no specific section within the Dublin City Development Plan that addresses the issue of hospital/health care facilities, there are a number of policies and objectives within the Plan which are of relevance. Included in these is Policy NC 19 which states it is the policy of Dublin City Council:

*'To facilitate the development or expansion and improvement of hospitals, community based healthcare facilities, respite homes and day care centres for the elderly in residential areas.'*

In this regard Dublin City Council recognises that certain public bodies, including health institutions, provide important facilities for the city on their sites. The Dublin City Development Plan states that the continued provision of these facilities is desirable for the economic, social and cultural health of the city. It is therefore, the policy of Dublin City Council to co-operate with these bodies and institutions in relation to the future planning and development of these sites so as to consolidate these uses in their present locations<sup>25</sup>.

As part of the strategic approach of the Dublin City Development Plan it states that in responding to the challenges facing the economy of the City and its role as the national and regional economic engine, the following approach will be pursued:

*"Developing academic medical centres providing excellence in research, care and teaching in the medical and health sectors<sup>26</sup>."*

St. James's Hospital is recognised by the Dublin City Development Plan as being in one of the three new innovation corridors radiating from the city centre i.e. *'Westwards from Heuston, including the Digital Hub, St. James Hospital, Park West, Cherry Orchard, the Naas Road developing area and extending into the wider metropolitan area to incorporate new urban centres such as Adamstown<sup>27</sup>'*. The Dublin City Development Plan states that these three corridors form part of a proposed innovation network to lever growth across the city region, leveraging on and supporting government policy to foster innovation and a smart economy<sup>28</sup>.

In addition to innovative corridors the Dublin City Development Plan also promotes innovative clusters through Policies RE17, RE19 and RE20 as follows:

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<sup>24</sup> Dublin City Development Plan, 2011 – 2017, pg. 12.

<sup>25</sup> Dublin City Development Plan, 2011 – 2017, pg. 188.

<sup>26</sup> Dublin City Development Plan, 2011 – 2017, pg. 136.

<sup>27</sup> Dublin City Development Plan, 2011 – 2017, pg. 24.

<sup>28</sup> Dublin City Development Plan, 2011 – 2017, pg. 24.



*“RE17 - To promote and facilitate economic development and clustering taking place along the Southern, Metro North and Naas Road / Rail Innovation Corridors within the Dublin city region and to promote the city centre being the economic engine for the region.”*

*“RE19 - (i) To encourage the regeneration of the city centre zoned area through the promotion and facilitation of innovation clusters and the intensification of existing clusters such as the Mater Hospital, James’ Hospital and the Digital Hub.*

*(ii) To recognise the strategic role of the hospital complexes in the city including the Children’s Hospital of Ireland having regard to their national medical function, their role as a major employer in the city, as a generator of significant economic benefits for the economy of Dublin’s inner city, and a promoter of the knowledge economy through research and education links with third level colleges in the city.”*

*“RE20 To develop and implement specific land-use and other planning policies so as to facilitate the retention and growth of existing and emerging clusters.”*

Policy RE19(ii) recognises the role all hospital complexes play in the life of the City and their importance as not only a service provider but as an employer, as a generator of economic benefits and as a promoter of the knowledge economy.

In addition, as shown on Plate 10 ‘Character Areas’ of the Dublin City Development Plan, St. James’s Hospital campus is also within the Heuston/Kilmainham character area. The Dublin City Development Plan seeks to strengthen individual character areas in order to consolidate and enhance the city centre, at the heart of the city region. In this regard Policy SC1 seeks:

*‘To consolidate and enhance the inner city by linking the critical mass of existing and emerging clusters and communities such as Docklands, Heuston Quarter, Grangegorman, Digital Hub, Parnell Square, the Ship Street Area and Smithfield with each other, and to regeneration areas’*

In relation to built heritage it is the policy of the Council under Policy FC27 to:

*“To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city”*

Plate 10 Extract for Figure 3 “Character Areas” of the Dublin City Development Plan, 2011-2017



St. James's Hospital campus is also located within the Heuston Gateway Cultural Quarter, see Plate 11 below with the development of such cultural quarters supported by Policies FC17, FCO15 and FCO16 of the Dublin City Development Plan.

Plate 11 Extract for Figure 13 “Main Cultural Quarters” of the Dublin City Development Plan, 2011-2017



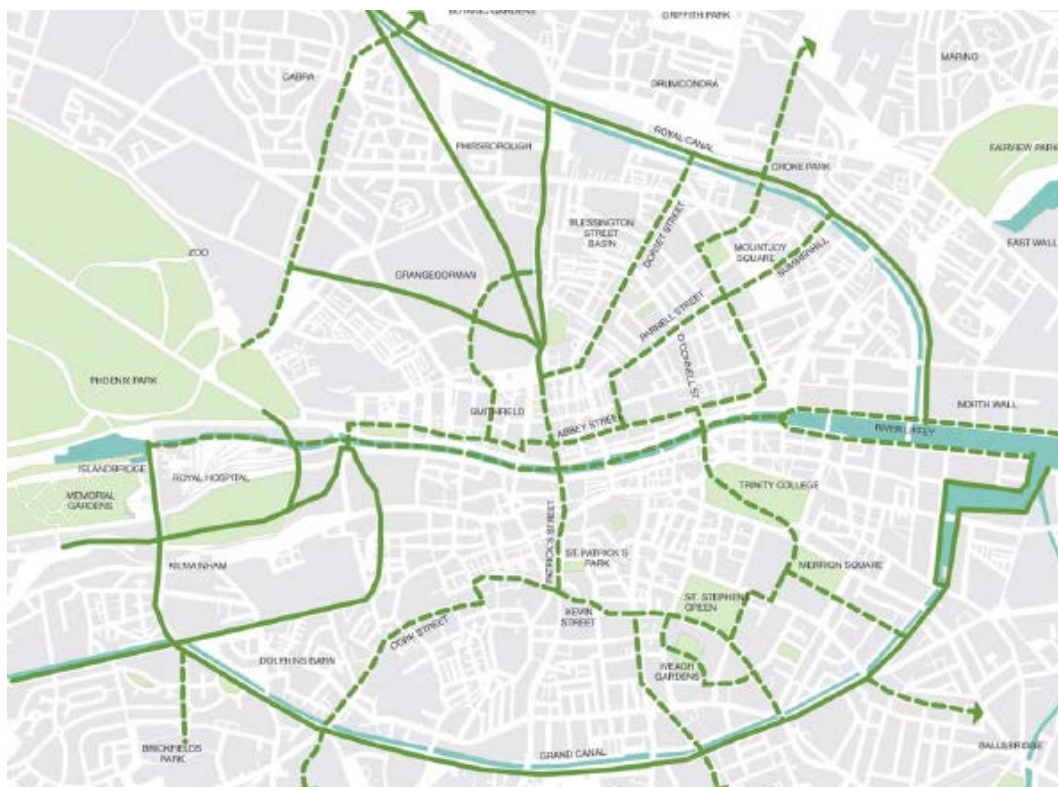
In addition and as shown on Plate 12 ‘City Centre Green Routes’ of the Dublin City Development Plan, the St. James's Hospital campus is located on an identified ‘Existing Green or Previously Proposed Corridor’. In this regard Policy GC1 states that it is a policy of the Council ‘to progress a strategic network as illustrated in the Strategic Green Network map’.

In relation to such green routes the Dublin City Development Plan states that public space in green routes shall be adequate to accommodate a footpath, two-way cycle lane and mature planting and that for larger sites including institutional lands, development proposals must take cognisance of the existing landscape character and quality<sup>29</sup>. According to the Dublin City Development Plan on Z15 zoned lands this shall include, as part of any redevelopment of the site, setting back of boundaries and/or adequate provision for greenways in accordance with routes illustrated<sup>30</sup>.

<sup>29</sup> Dublin City Development Plan, 2011 – 2017, pg. 241.

<sup>30</sup> Dublin City Development Plan, 2011 – 2017, pg. 191.

Plate 12 Extract from Figure 11 “City Centre Green Routes” of the Dublin City Development Plan, 2011-2017



## Development Standards

In addition to assessing proposals in terms of their consistency with the Dublin City Development Plan's core strategy and policy objectives, the Dublin City Development Plan also contains qualitative and quantitative development standards. An overview of the relevant development standards are provided as follows.

## Development Standards - Height

Section 4.4.4 of the Development Plan "*Taller buildings as Part of the Urban Form and Spatial Structure of Dublin*" outlines Dublin City Council's approach to taller buildings. The key provisions of this Section can be summarised as follows, *inter alia*:

- Dublin City Council considers that Dublin should predominantly remain as a low-rise city.
- The merit of taller or landmark buildings in a very limited number of locations for economic and identity reasons appropriate for a capital city is also recognised.
- 13 specific areas are identified for taller buildings, 9 in the mid-rise category (i.e. up to the height of Liberty Hall) and 6 are in areas already the subject of local area plans or framework development plans, where height has already been specified.
- The above is supported through policy, specifically Policies SC17, SC18 and SC19. It should be noted that none of these stated policies prescribe a maximum height for *"remaining areas of the city"*. In this regard Policy SC18 again refers to the Development Standards Section contained in Chapter 17 of the Dublin City Development Plan.



Section 17.6 of the Development Plan "*Building Height in a Sustainable City*" addresses building heights from a development standards perspective, again stating that:

*"It is the policy of Dublin City Council to continue to protect and enhance the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city, and create opportunities for place-making identity in the outer city"*

The 4 no. areas designated as appropriate for high buildings of 50m plus (12 storey commercial/16 storey residential) are identified, as are the 9 no. areas with potential for up to 50m. With regard to building heights in areas outside these designated areas, which would include St. James's Hospital campus, the Development Plan states<sup>31</sup>:

*"i) Outside the identified mid to high-rise areas, all proposed buildings will be assessed against the qualitative and quantitative standards set out in the development plan, including those standards addressing local character, streetscape, open space, daylight and the amenity of existing and future residents.*

*ii) In any case, the maximum height outside the identified areas will be as follows:*

*a) Inner city: 6 storey residential / 7 storey commercial.*

*b) Within 500m of existing and proposed mainline, DART, DART Underground and Metro Stations: 6 storey residential / 6 storey commercial.*

*c) Rest of outer city: 4 storey residential / 4 storey commercial.*

*iii) Where a site has a pre-existing height over that stipulated above, a building of the same number of storeys may be permitted subject to assessment against the standards set out elsewhere in the development plan."*

As shown on Map K of the Dublin City Development Plan, St. James's Hospital campus is within the *Inner City* area. In this regard Section 17.6.2 of the Development Plan '*Definition of a High Building*' provides a definition of height for such areas as below 19m residential / 28m office. In addition, item iii) makes provision for a site with a "*pre-existing height over that stipulated above*<sup>32</sup>". It should be noted that the Dublin City Development Plan states that the height definition is based on an average floor to ceiling height of 3.0m for residential schemes and 4.0m for office/commercial<sup>33</sup>.

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<sup>31</sup> As amended by Variation 14 of the Dublin City Development Plan, 2011 - 2017.

<sup>32</sup> There are 2 no. recent permissions for seven storey buildings on St. James's hospital campus (Reg. Refs. 3325/13 and 3607/12) which were granted under the current CDP. Permission was also granted by DCC and the Board for an eight storey Private Hospital on the St. James's hospital campus (Reg. Ref. 2751/09, Board Ref. 236070).

<sup>33</sup> Hospital requirements in excess of this 4m height were addressed as part of the private hospital application (Reg. Ref. 2751/09, Board Ref. 236070) and also Reg. Ref. 3607/12.

Regard must also be had to the transitional location of St. James's Hospital campus in the context of adjacent residential areas. With regard to such areas the Dublin City Development Plan states that it is important to avoid abrupt transitions in scale and use zones, stating that in zones abutting residential areas or abutting residential development within predominately mixed-use zones, particular attention must be paid to the use, scale, density and design of development proposals and to landscaping and screening proposals in order to protect the amenities of residential properties<sup>34</sup>. In addition, and specifically with regard to Z15 lands, the Dublin City Development Plan states that development at the perimeter of the site adjacent to existing residential development shall have regard to the prevailing height of existing residential development and to standards in relation to aspect, natural lighting, sunlight, layout and private open space and in relation to the avoidance of abrupt transitions of scale between zonings<sup>35</sup>.

#### Development Standards - Design

Developments that exceed 20,000sq.m must make a significant contribution to an area in terms of community facilities and social infrastructure. Proposals of this scale are required to be accompanied by an Urban Design Statement. In addition, developers will be required to submit an audit of existing facilities within the area and to demonstrate how the proposal will contribute to the range of supporting community infrastructure and how it will deliver a key social infrastructure element<sup>36</sup>.

#### Development Standards – Layout

The layout of buildings must be designed to ensure that areas are permeable, legible and safe. Appendix 21 of the Dublin City Development Plan contains design guidelines for the design of safe environments.

#### Development Standards – Plot Ratio

The Dublin City Development Plan provides indicative plot ratio standards, with Z15 “Institutional and Community” lands having an indicative plot ratio of 0.5 – 2.5. The Dublin City Development Plan notes that in certain circumstances a higher plot ratio may be permitted such as *inter alia* adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed, to facilitate comprehensive redevelopment in areas in need of urban renewal, where a site already has the benefit of a higher plot ratio. Notwithstanding the aforementioned the Dublin City Development Plan states that the maximum height standards set out in Section 17.6 shall have precedence over the indicative Plot Ratio.

#### Development Standards – Site Coverage

The Dublin City Development Plan provides indicative site coverage standards, providing an indicative standard of 50% for Z15 zoned lands. In this regard the special considerations which apply to plot ratio, will also apply to site coverage and that the maximum height standards set out at Section 17.6 shall have precedence over the indicative site coverage standards.

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<sup>34</sup> Dublin City Development Plan, 2011 – 2017, pg. 192.

<sup>35</sup> Dublin City Development Plan, 2011 – 2017, pg. 206.

<sup>36</sup> Dublin City Development Plan, 2011 – 2017, pg. 262.

### Development Standards – Density

The Dublin City Development Plan identifies that the attainment of higher densities is not a stand-alone objective but rather that higher densities must be delivered in tandem with quality to ensure the creation of good urban places and attractive neighbourhoods. In this regard the Dublin City Development Plan states that allowable density will be subject to the qualitative safeguards and policies outlined in the Dublin City Development Plan and that public transport capacity will also be used to determine the appropriate density allowable<sup>37</sup>.

Policy SC 13 promotes ‘...sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city; which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas...’.

### Development Standards – Open Space

In relation to the provision of public open space the Dublin City Development Plan states as part of the policy approach to develop the green network, enhance bio-diversity and provide public open space throughout the city, the provision of public open space will be required in development proposals on inter alia institutional and community lands (Z15). In this regard, the Dublin City Development Plan requirement for Z15 lands will be 25% open space and/or provision of community facilities<sup>38</sup>. In the case where a Masterplan is being prepared for Z15 lands, where an existing use is no longer required, the Masterplan shall set out a clear vision for the lands zoned Z15, to provide for the identification of 25% of the lands for open space and/or community facilities<sup>39</sup>.

The Dublin City Development Plan states, depending on the location, the type of space could contribute towards the green network, provide local parks, provide playgrounds/play spaces, provide outdoor civic spaces/plazas, improve the streetscape/ amenities/landscaping. There will be a preference for soft landscaping where possible and hard landscaping will be considered only in schemes where soft landscaping would not be viable or appropriate. The Dublin City Development Plan sets out that sustainable open space must be designed to be accessible and that landscaping should enhance the ecological value of the site and increase biodiversity.

### Development Standards – Protected Structures

Development proposals within the curtilage of a protected structure “should include an appraisal of the wider context of the site or structure. This appraisal should examine the visual impact and design of the proposal and should address issues including the grain of historic settings, sensitivity to scale and context, views and the design of innovative quality architecture which would complement the setting of the protected structure<sup>40</sup>”.

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<sup>37</sup> Dublin City Development Plan, 2011 – 2017, pg. 243.

<sup>38</sup> Dublin City Development Plan, 2011 – 2017, pg. 242.

<sup>39</sup> Dublin City Development Plan, 2011 – 2017, pg. 207.

<sup>40</sup> Dublin City Development Plan 2011-2017, pg. 271-272.

### Development Standards – Transport

The Dublin City Development Plan requires that a Transport Assessment be submitted for developments with significant car trip generation potential and attraction rates<sup>41</sup>. In general a Transport Assessment is required if a development *inter alia* generates more than 500 private vehicle trips per day and/or more than 100 trips in the peak period. A Travel Plan is required to be submitted if a proposal has the potential to employ over 100 workers.

### Development Standards – Car Parking

The Dublin City Council area is divided into three areas for the purpose of parking control with St. James's hospital campus located in Area 2. In relation to this area the Dublin City Development Plan states that the car parking provision in Zones 1 and 2 is restricted due to the proximity of these locations to public transport and that an increased density of development may be permitted in certain instances at locations in such zones where the development is in close proximity to good public transport links<sup>42</sup>.

The standard provided in Table 17.1 of the Dublin City Development Plan for Hospitals (Out Patient facilities) is 1 no. space per 100m<sup>2</sup> gross floor area and the standard for Clinics and Group Practices is 2 spaces per consulting room. A note to the Table states that '*in assessing car parking requirements for hospitals Dublin City Council will have regard to the numbers of medical staff, administration staff, patients and visitors.*'

The Dublin City Development Plan states that these car parking standards are generally regarded as the maximum parking provision and that provision in excess of these shall only be permitted in exceptional circumstances. Parking provision below the maximum may be permitted in certain instances subject to such provision not impacting negatively on the amenities of surrounding properties or areas and there being no potential negative impact on traffic safety. The Dublin City Development Plan provides that the Planning Authority may require the maximum number of car parking spaces specified in Table 17.1 to be further reduced where it is considered that the surrounding road network is not sufficient to cater for the volume of traffic likely to be generated by the proposed development<sup>43</sup>.

At least 5% of the total number of spaces should be designated for disabled car parking and motorcycling should be provided in designated signposted areas at a rate of 4% of the number of car parking spaces provided.

### Development Standards – Cycle Parking

The Dublin City Development Plan states that secure cycle parking facilities shall be provided in *inter alia* new Public Transport Interchanges, office blocks, hospitals, etc., in accordance with the standards set out in Table 17.2. The standard provided in this Table for Hospitals (Out Patient facilities) is 1 space per 5 hospital beds.

The Dublin City Development Plan provides guidance in relation to the location of bicycle spaces including *inter alia* distances of the racks to the destination, cycle facilities in multi-storey car parks, shower and changing facilities etc.

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<sup>41</sup> Dublin City Development Plan, 2011 – 2017, pg. 60.

<sup>42</sup> Dublin City Development Plan, 2011 – 2017, pg. 291.

<sup>43</sup> Dublin City Development Plan, 2011 – 2017, pg. 291.

## Development Standards - Energy Efficiency

The Dublin City Development Plan highlights Dublin City Council's commitment to encouraging the efficient use of energy and the use of renewable energy. In this regard Policy SI61 of the Dublin City Development Plan seeks:

*"To promote energy efficiency, energy conservation, and the use of renewable energy in existing and new developments"*

With regard to development management, it is an Objective of the Dublin City Development Plan (Objective SIO90):

*"To require that proposals for large-scale developments (typically 50 units or 5,000sq.m and above) or as may be determined by the planning authority, should include an Energy Statement to accompany any application, illustrating how the proposal incorporates the above design considerations and how it addresses energy efficiency with regard to the demolition, construction and long-term management of the development"*

Section 17.1.4 of the Dublin City Development Plan, "Sustainable Site and Building Design", sets out Dublin City Council's approach to sustainability in site and building design. It outlines a number of key design considerations to be included at an early stage in the design process and to be incorporated in the development where feasible. The key design considerations include:

- Passive solar design including the orientation, location and sizing of windows
- The use of green building materials: low embodied energy & recycled materials
- The use of natural ventilation or mechanical ventilation with heat recovery
- Energy efficient window glazing units and frames
- Building envelope air tightness
- Appropriate use of thermal mass and insulation
- Appropriate renewable technologies
- Measures to conserve water

In addition Dublin City Council recommends that for larger schemes consideration should be given to district heating schemes and Combined Heat and Power.

## Development Standards – Water and Waste Management

With regard to sustainable urban drainage, the Dublin City Development Plan recommends consideration of the following schemes: Green roofs and raised courtyards; Attenuation ponds, swales, wetlands and detention basins (in larger schemes); Permeable paving; Infiltration planters; and, Water butts. Policy SI52 states that it is the policy of the Council to:

*"To require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works. The following measures will apply: The infiltration into the ground through the development of porous pavement such as permeable paving, swales, detention basins; The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, wetlands; The slow down of the movement of water"*

With regards to waste water it is an objective of the Council to:

*"SIO73 - To require that all new developments comply with the Greater Dublin Regional Code of Practice for Drainage Works and the code of practice for drainage works as set out by Drainage Division of Dublin City Council".; and,*

*"SI76 - To require that all developments should include a Wastewater Discharge Plan to accompany any application demonstrating to the satisfaction of the planning authority that the proposed discharge of waste water from the proposed development, in conjunction with existing discharges, would not cause noncompliance with the combined approach as defined in the Waste Water Discharge (Authorisation) Regulations 2007."*

For details of water services including items such as the Drimnagh sewer please see chapter 17 "Material Assets – Site Services" of the EIS.

With regard to waste management it is an objective of the Council to:

*"SIO61 - To promote the reuse of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000sq.m. a materials source and management plan showing type of materials/proportion of reuse/recycled materials to be used shall be implemented by the developer".*

#### 12.5.1.2 Dublin City Sustainable Energy Action Plan, 2010 - 2020

The Dublin City Sustainable Energy Action Plan, 2010-2020 was produced during the lifetime of the previous Dublin City Development Plan, 2005. The core aims of the Action Plan were to analyse the City's current energy and carbon dioxide emissions and to evaluate ways of reducing energy consumption across a number of areas including *inter alia* residential and commercial buildings, services, industry and transportation, as well as increasing the usage of renewable energy.

The Action Plan recognises that the Dublin City Development Plan, 2011-2017, which was adopted shortly after the production of the Action Plan, would contain a new, more strategic, approach to sustainability. The new approach would encompass climate change, energy efficiency, renewable energy and transportation. The Aim of the Action Plan was that this approach would look beyond the period of the Dublin City Development Plan, i.e. 2011-2017, setting out a longer term vision for Dublin to become an energy-smart city by 2030.

#### 12.5.1.3 Davitt Road

Davitt Road is located in the administrative area of Dublin City Council and therefore, the Dublin City Development Plan, 2011-2017, which came into effect on 22nd December 2010<sup>44</sup>, is the relevant statutory plan. The Dublin City Development Plan provides the local statutory planning policy for the City and is the principle document for guiding the development of the subject lands.

<sup>44</sup> We have accounted for the variation arising from the Judgment and Order of the High Court dated 27<sup>th</sup> April 2012 and 27<sup>th</sup> June 2012, respectively, in relation to the former Z15 Zoning in the CDP.



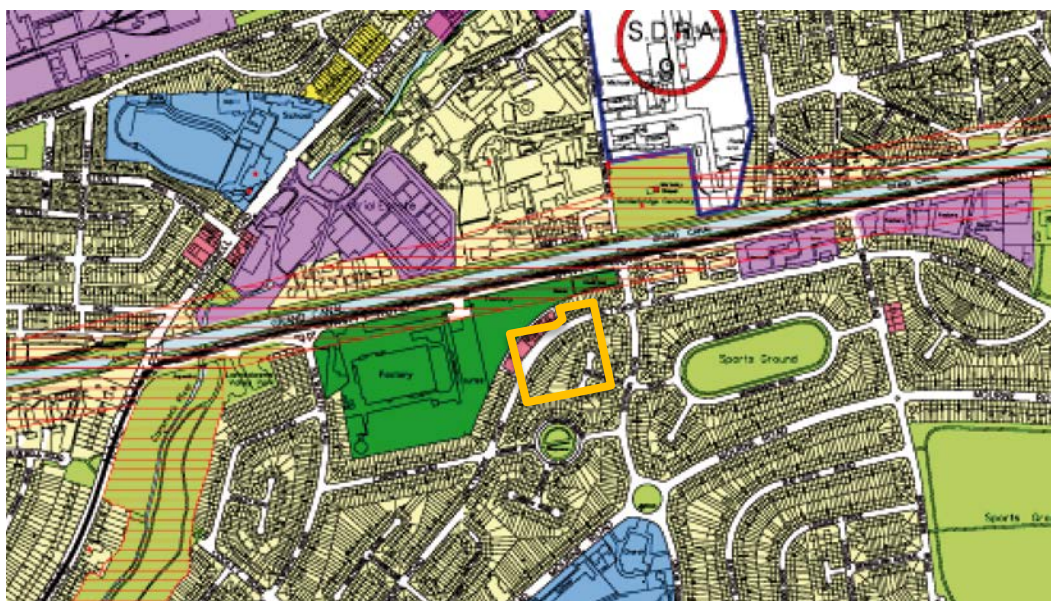
## Zoning and Site Specific Objectives

The subject site is zoned as Z10 in the Dublin City Development 2011-2017. The objective for this zoning is,

*"To consolidate and facilitate the development of inner city and inner suburban sites for mixed-use development of which office, retail and residential would be the predominant uses."*

Under this zoning there are a number of uses that are permitted in principle. These include medical and related consultants as well as buildings for the health, safety and welfare of the public<sup>45</sup>. The location of the site is shown below in Plate13.

**Plate 13 Extract from Map D and E of the Dublin City Development Plan, 2011 - 2017**



### Surrounding Land Use Zonings

The site is located immediately south of Davitt Road and has frontage along its northern boundary onto same. North of Davitt Road, on the opposite side of the Luas tracks, are lands that are zoned Z9 and Z11. These zoned lands run parallel with the canal and provide for the preservation and the improvement of this amenity space. Immediately to the north of the amenity space is a mixture of lands that are zoned Z6 'To provide for the creation and protection of enterprise and facilitate opportunities for employment creation', and Z1 'Residential (General)'.

The site is bound to the west by the site of the recently permitted ambulance base (Reg. Ref. 2309/15) and to the east by undeveloped lands that are in the ownership of the Health Service Executive. These adjoining lands have the same Z10 zoning as the subject site. The rear garden walls of the houses fronting onto Carrow Road abut the site to the south. These lands to the south of the site are zoned Z1 'Residential (General)'.

<sup>45</sup> Dublin City Development Plan 2011-2017, pg. 202-203.

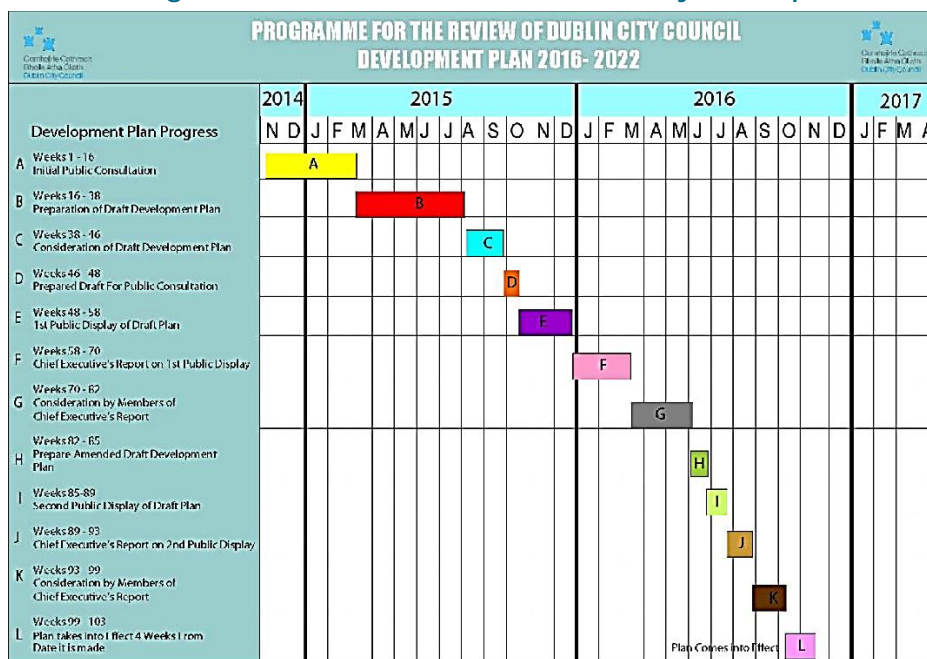
### 12.5.1.4 Drimnagh Integrated Area Plan, 2009

The site is located within the area designated in the Drimnagh Integrated Area Plan. This Plan seeks to develop a number of mixed use sites and improve the environment in the surrounding area. Within the Plan the Davitt Road site forms part of an area known as Canal Village, a mixed use promenade enhancing the canal as an amenity. In this context, the Plan states that the subject site has the potential to significantly improve amenity and facilities for Drimnagh residents.

### 12.5.1.5 Dublin City Development Plan, 2016 – 2022

Dublin City Council has commenced the review of the Dublin City Development Plan, a two year statutory process that leads to the adoption of a new Dublin City Development Plan in 2016. From 10<sup>th</sup> November 2014 to 14<sup>th</sup> January 2015, citizens, communities and organisations were invited to make observations. These observations are currently being reviewed as part of the next step in the process. A Draft City Development Plan is due to be published in October / November of 2015. A snapshot of the review timetable is set out in Plate 14 below.

**Plate 14: Programme for the Review of the Dublin City Development Plan 2016 – 2022**



### 12.5.2 Tallaght Hospital

#### 12.5.2.1 South Dublin County Development Plan, 2010 – 2016

The Tallaght Hospital campus is located in the administrative area of South Dublin County Council and therefore, the South Dublin County Development Plan, 2010 - 2016 is the relevant statutory plan. The fundamental aim of the South Dublin County Development Plan is to respond in a coherent, sustainable and spatial fashion to the challenges facing this County while building on its strengths and introducing resilience to wider effects of climate change<sup>46</sup>.

<sup>46</sup> South Dublin County Development Plan, 2010-2016, pg. 30.



### Zoning and Site Specific Objectives

Under the South Dublin County Development Plan the subject site is zoned CT *'To protect, improve and provide for the future development of the County Town of Tallaght'*, see Plate 15 below. Hospital as a land use is Permitted in Principle under this zoning. The subject site also contains the following Local Objective:

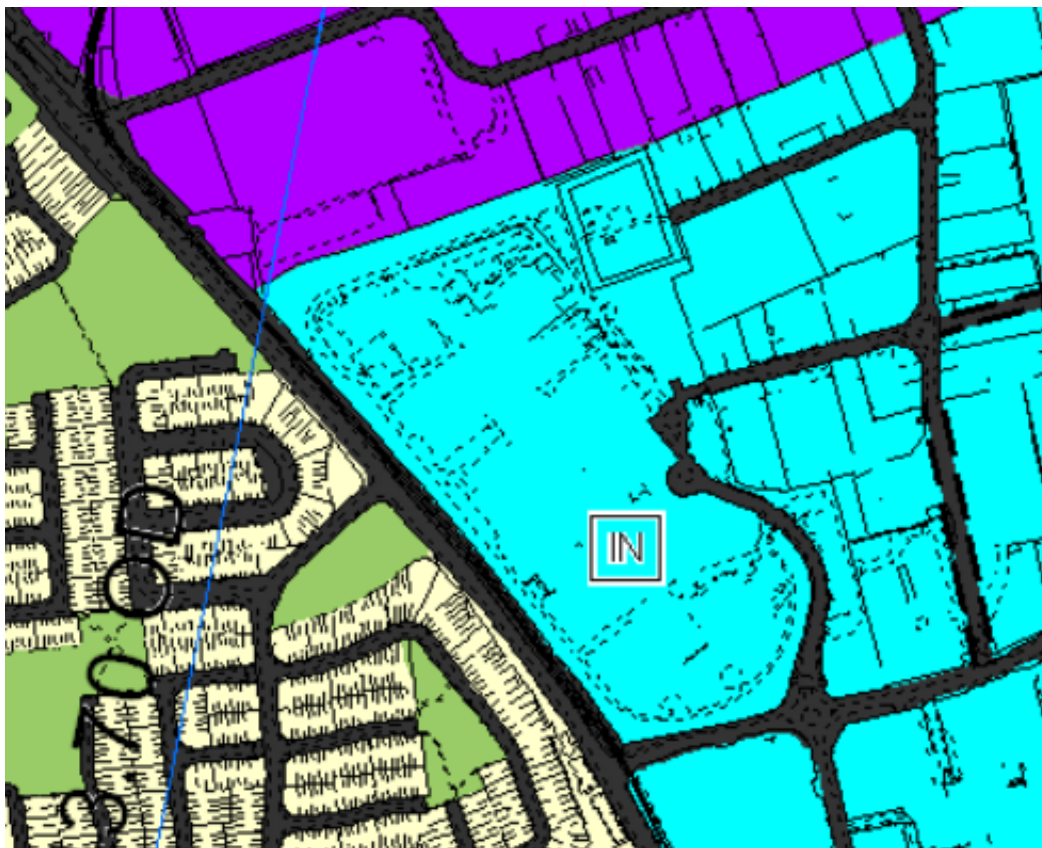
*'IN – to provide for a post primary school or other institution'*. The site is within the Baldonnel Casement Aerodrome identified on the SDCDP maps as *"Approach Areas Variable Height Restrictions"*.

It appears that this objective may be an error, although no confirmation of this has been given.

### Surrounding Land Use Zonings

The Tallaght Hospital campus is bound to the north by lands zoned EP1 with the objective, *'to facilitate opportunities for intensive employment uses complemented by mixed-use development based on a principle of street networks and in accordance with approved plans'*, and to the east and south are lands zoned CT *'To protect, improve and provide for the future development of the County Town of Tallaght'*. To the west of the site are residential lands zoned A *'To protect and/or improve residential amenity'*, with adjoining open space zoned F *'To preserve and provide for open space and recreational amenities'*.

**Plate 15 Extract from South Dublin County Development Plan Maps, 2010-2016**



## Policy

With regard to Town Centres it is the aim of the Council to achieve an efficient use of land appropriate to its context, with businesses and a variety of mixed-uses directed to locate within the hierarchy of urban centres and focused around public transport infrastructure<sup>47</sup>, as supported by Policy TDL3. The South Dublin County Development Plan recognises Tallaght Town Centre as providing a range of uses and states that the Regional Hospital is well established in the Town<sup>48</sup>. In this regard the future development of Tallaght is supported by a number of policies including *inter alia* Policy TDL6: Public Transport in Tallaght, Policy TDL7: Tallaght County Town and Policy TDL10: Tallaght Education City and Innovation City.

With regard to the further development of enterprise and employment in the County the strategy of the Council is to '*facilitate the creation of suitably located centres of excellence for knowledge, innovation and creativity based enterprises and ensure the knowledge-based economy has opportunity to grow in the County*<sup>49</sup>'. In this regard, the Council seek to work in conjunction with the County's third level and medical institutions in the creation and fostering of enterprise, Policy EE3.

Tallaght Town Centre designation, within which the Tallaght Hospital campus is located, is also considered to be the most appropriate location for an Intellectual Development Zone capability of promoting innovation<sup>50</sup>. In this regard Policy EE9 on Economic Clusters states:

*'It is the policy of the Council to promote innovative economic sectors and encourage business clusters that exploit links with one another and/or third level and medical institutions.'*

## Development Standards

The South Dublin County Development Plan sets out development standards that proposals for development must take account of in addition to consistency with the policies and objectives and other relevant legislative requirements. An overview of the relevant development standards are provided as follows.

### Development Standards - Height

The South Dublin County Development Plan provides guidance on development management within the County. With regard to heights of new buildings the Plan states that in the development of a diverse urban environment common to the traditional town, a variety of building heights is appropriate<sup>51</sup>. In determining building height the South Dublin County Development Plan provides the following guidance for consideration including *inter alia*:

- The height of surrounding development and the formation of a cohesive streetscape pattern.

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<sup>47</sup> South Dublin County Development Plan, 2010-2016, pg. 202.

<sup>48</sup> South Dublin County Development Plan, 2010-2016, pg. 204.

<sup>49</sup> South Dublin County Development Plan, 2010-2016, pg. 182.

<sup>50</sup> South Dublin County Development Plan, 2010-2016, pg. 184.

<sup>51</sup> South Dublin County Development Plan, 2010-2016, pg. 114.

- In general, perimeter blocks should be three to five storeys in height including a top floor setback. Deviations from these standards may be considered within designated town, district and local centres (where appropriate) and where there is high quality public transport (Luas and rail) where amenities can be maintained.
- Their location at key nodes, the main street network and principal public spaces. These locations may be suitable to larger buildings that serve to define a node, gateway or edge or landmark buildings.
- The height and scale of the proposed development in relation to the width of the street, or area of open spaces to which the building fronts.
- Airport height controls.

In relation to high buildings, these are defined as buildings that exceeds five storeys (15 metres approximately) or are significantly higher than neighbouring or surrounding development. Policy SN15 addresses the issue of building height stating:

*“It is the policy of the Council that the height of proposed developments shall ensure enclosure and clarity to reinforce and make legible the hierarchy of streets and public spaces that constitutes the urban area.”*

#### Development Standards – Design

The Council requires that all applications greater than 1000sq.m be accompanied by a Design Statement to include a Site Analysis and Concept Plan<sup>52</sup>.

#### Development Standards – Transport

Policy T18 states that a Transport and Traffic Impact Statement should be submitted with all significant development proposals. The Transport and Traffic Impact Statement should address the impact of the proposed development on the local and broader street network, and should provide a clear rationale for the proposed level of car parking having regard to the existing and potential availability of public transport services in the area<sup>53</sup>.

In relation to Mobility Management Plan's the South Dublin County Development Plan states that these are required for larger sized developments which are likely to result in more than 500 employees and which will generate significant trip demand, see Policy T19.

#### Development Standards – Car Parking

In relation to car parking the South Dublin County Development Plan states that the main vision of this Plan is the consolidation of the urban environment around public transport infrastructure and important nodes and to create places people will wish to visit, live in, work in and stay<sup>54</sup> as supported by Policy T31. Table 2.2.4 of the South Dublin County Development Plan provides the general car parking standards related to land use with “Hospital” land use “to be determined by Planning Authority”. With regard to sites such as the Tallaght Hospital campus which are located in the Town Centre and proximate to public transport, Policy T34 states:

<sup>52</sup> South Dublin County Development Plan, 2010-2016, pg. 109.

<sup>53</sup> South Dublin County Development Plan, 2010-2016, pg. 136.

<sup>54</sup> South Dublin County Development Plan, 2010-2016, pg. 139.

*"It is the policy of the Council that in areas well served by public transport or alternative means of access the car parking standards provided in the Development Plan shall be taken to be the maximum provision required."*

In this regard, the South Dublin County Development Plan states that reduced standards may be acceptable where the following factors are considered:

- Proximity of the site to public transport and the quality of the transport service it provides.
- The proximity of the development site to services that fulfil occasional and day to day needs.
- The existence of a robust and achievable MMP for the development.
- The ability of people to fulfil multiple needs in a single journey.
- The levels of car dependency generated by particular uses within the development.
- The ability of residents to live in close proximity to the workplace.
- Peak hours of demand and the ability to share spaces between different uses<sup>55</sup>.

### Development Standards – Cycle Parking

For new hospital developments the Council will require that secure covered cycle parking facilities incorporating frame locking facilities are provided and that bicycle parking is located close to entrances. The South Dublin County Development Plan recommends that a number of smaller well located secure storage facilities will be preferable to a larger more distantly located facility<sup>56</sup>.

### Development Standards – Water and Waste Management

It is the policy of the Council that all development proposals incorporate Sustainable Urban Drainage Systems, see policy WD6.

Policy ES17 states "It is the policy of the Council to require that planning applications for development (apart from residential developments of less than 15 units) be accompanied by a Waste Management Plan which shall be agreed with the Planning Authority prior to the commencement of Development. The Plan, as a minimum, shall include a provision for the management of all construction and demolition waste arising on site, shall make provision for the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, the re-use of excavated material from development sites on the site is to be encouraged, for landscaping, land restoration or for preparation for development."

### Development Standards – Energy Efficiency

The South Dublin County Development Plan details the Council's policies on Energy Efficiency in Buildings. It notes that during all stages of the design process, regard should be had to the implications of decisions on energy demand and that the ultimate outcomes of these decisions dictate the level to which a development will be deemed successful and sustainable<sup>57</sup>. Policies SN33 and SN34 state the Council's intention to encourage energy efficient design of buildings and their layout and orientation on site:

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<sup>55</sup> South Dublin County Development Plan, 2010-2016, pg. 140

<sup>56</sup> South Dublin County Development Plan, 2010-2016, pg. 134.

<sup>57</sup> South Dublin County Council Development Plan 2010-2016, pg. 119.

*"Policy SN33 - It is the policy of the Council to promote and support the use of passive measures in preference to active measures in the construction of the building fabric of new developments, in order to minimise future reliance on fuel sources.*

*Policy SN34 - It is the policy of the Council to promote a practice in building construction of the highest standards in the following areas: insulation, solar panelling, geothermal energy and other heating systems."*

Policy 36 sets out the Council's commitment to encouraging more sustainable development, the efficient use of energy and the use of renewables in new build and refurbishment projects:

*"It is the policy of the Council to promote innovative building design that demonstrates a high level of energy conservation, energy efficiency and use of renewable energy sources in accordance with national regulations and policy guidelines."*

#### 12.5.2.2 Draft South Dublin County Council Development Plan, 2016 - 2022

South Dublin County Council has started its review of the South Dublin County Development Plan, 2010 - 2016 and will create a new County Development Plan that will shape the future growth of the County over the six year period from 2016 to 2022. The Draft South Dublin County Development Plan, 2016 - 2022 has now been prepared and is on public display from Monday 13th July to Monday 24th September 2015. There are a number of draft policies and development standards pertaining to the hospital campus in the draft plan and these are detailed below.

#### Zoning

The subject site is proposed to be zoned Objective TC *"to protect, improve and provide for the future development of Town Centres"*. *"Hospital"* as a land use is Permitted in Principle. There is a continuation of similarly zoned TC lands to the south of the site while lands to the north and east are proposed to be zoned Objective Regen *"to facilitate enterprise and/or residential-led regeneration"*. To the west of the site the lands have a draft zoning of Objective RES *"to protect and/or improve residential amenity"* with adjacent open spaces proposed to be zoned Objective OS *"to preserve and provide for open space and recreational amenities"*.

#### Policy

With regard to healthcare facilities, the Draft Plan states that the Council will assess proposals on their own merits, but note that the proposals should reflect the County's Settlement Hierarchy with regard to scale and location<sup>58</sup>. Proposed policies C11a and C11b and Objective C11(4) outline the Council's support for 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.*

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<sup>58</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 61.

*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.*

*C11 Objective 4: To direct healthcare facilities into town, village, district and local centres and to locations that are accessible by public transport, walking and cycling, in the first instance."*

## Development Standards

The relevant development standards as set out in the Draft Development Plan are set out as below.

### Development Standards – Healthcare Facilities

With respect to locational factors, large medical centres and group practices will be favourably considered in town, district, village and local centres. Planning applications for healthcare facilities should be accompanied by details of proposed professional medical (commercial) activities, proposed number of practitioners and support staff and intended hours of operation<sup>59</sup>.

### Development Standards – Height

Varied building height is supported subject to appropriate safeguards. The appropriate building height will be determined having regard to the following considerations: the prevailing building height in the surrounding area; the formation of a cohesive streetscape (including height and scale of the proposed development in relation to width of the street, or area of open space); and, the proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development<sup>60</sup>. Buildings that exceed five storeys are considered 'tall buildings' and will only be considered at areas of strategic planning importance such as key nodes, along the main street network and along principal open spaces in Town Centres, Regeneration zones and Strategic Development Zones.

### Development Standards – Design

Large scale development proposals including community developments of 1,000sq.m and above shall be accompanied by a design statement that consists of: a site analysis; a concept plan and / or masterplan; a statement based on the design criteria set out in the relevant National Planning Guidance; and, a statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets<sup>61</sup>.

### Development Standards – Transport

It is a requirement that all major traffic generating proposals be accompanied by a Traffic Impact Assessment as defined by the Traffic Impact Guidelines 2014. The Traffic Impact Assessment will be required to *"demonstrate that sufficient, realistic and verifiable levels of public transport carrying capacity and road capacity will be provided for, in a sustainable, phased manner, so as to cater for all new trips to be generated by the development"*.

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<sup>59</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 201.

<sup>60</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 190.

<sup>61</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 186.



Table 11.25 sets the thresholds for the requirement of a Workplace Travel Plan to accompany an application. For the land use '*Hospitals/Medical Centres*' if the proposal will create 25 – 100 jobs and/or receive between 100 to 100,000 visitors per annum.

#### Development Standards – Car Parking Standards

Tables 11.23 sets out the Maximum Parking rates for the land use "*hospital*" and "*Clinics and Group Practices*". The site is considered to be in Zone 2 (Non Residential) within such the land use "*hospital*" has a requirement for 1 space per 150sq.m gross floor area and the land use "*Clinics and Group Practices*" has a requirement of 1.5 spaces per consulting room. The standards are seen as a maximum or target requirement and proposals that include lower rates may be deemed acceptable in certain circumstances including *inter alia* proximity to public transport, the ability of residents to live in close proximity to the workplace and the existence of an achievable Mobility Management Plan<sup>62</sup>. With regard to electric vehicles, non-residential developments should provide facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces<sup>63</sup>.

#### Development Standards – Cycle Parking

Minimum bicycle parking rates are divided into two categories; long term and short stay. For the land use "*hospital*" 1 parking space is to be provided per 5 staff and 1 parking space per 10 beds. For the land use "*Clinics and Group Practices*" 1 parking space is to be provided per 5 staff and 0.5 parking spaces per consulting room. Commercial developments that accommodate in excess of 10 staff / students are required to provide shower and changing facilities.

#### Development Standards – Water and Waste Management

The maximum permitted surface water outflow from any new development should not exceed the existing situation. In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems <sup>64</sup>. A construction and demolition waste management plan should be submitted for new proposals of health facilities that exceed 1,000sq.m floor space.

#### Development Standards – Energy Efficiency

Commercial developments in excess of 10 residential units and/or 1,000sq.m of commercial floor space should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement.

#### 12.5.2.3 Tallaght Town Centre Local Area Plan, 2006

The Tallaght Town Centre Local Area Plan, which was adopted in 2006 was subsequently renewed in 2011 by the elected members. The Vision Statement for the Plan is:

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<sup>62</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 205-206.

<sup>63</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 206.

<sup>64</sup> Draft South Dublin County Development Plan, 2016-2022, pg. 211.



*'To facilitate the development of Tallaght Town Centre as a vibrant, sustainable Town Centre, where the whole community can avail of the highest standards of housing, employment, services and amenities. To ensure that Tallaght Town Centre is characterised by the following:- good connections and accessibility, an attractive built environment and is a place where people want to be and can be proud of.'*

## Policy

The Local Area Plan recognises the importance of community/social Infrastructure in serving the needs of the community in areas such as *inter alia* education, health and emergency services and the requirement to ensure that such facilities are located so as to be used in an efficient and cost-effective manner. It is thus an objective of the Local Area Plan to "*facilitate the expansion and enhancement of existing community facilities and to facilitate the provision of a range of new community facilities to meet the needs of both the existing and future residents of Tallaght*"<sup>65</sup>.

The Local Area Plan also provides the overall strategies in the three areas of Land Use and Intensity, Access and Movement and Community and Culture, that will shape the future development of Tallaght Town Centre.

## Development Standards

The Local Area Plan includes development management standards that are to be used to guide the detailed design process and the relevant standards are outlined below.

### Development Standards - Design

The Local Area Plan states that the layout and orientation of development should be guided by factors such as the nature of surrounding development, natural features, accessibility, sunlight patterns and climate, which are to be identified by the process of Site Analysis<sup>66</sup>. Such Site Analysis should include references to *inter alia*: land use; scale of surrounding buildings; key frontages; pedestrian links; and, public and private space, and should be submitted with applications for new developments on sites over 500m<sup>2</sup> as part of the Design Statement<sup>67</sup>. The Design Statement is also to demonstrate that all buildings are designed to a high quality and that buildings should be designed to be as energy efficient as possible and address the following *inter alia* insulation, orientation, water recycling and construction materials.

### Development Standards - Building Height and Plot Ratio Thresholds

While the Local Area Plan applies plot ratio and building height thresholds to the Tallaght Town Centre Area the Tallaght hospital campus lands are "*subject to a detailed Masterplan/Conservation Plan*" on both plot ratio and building height.

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<sup>65</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 36.

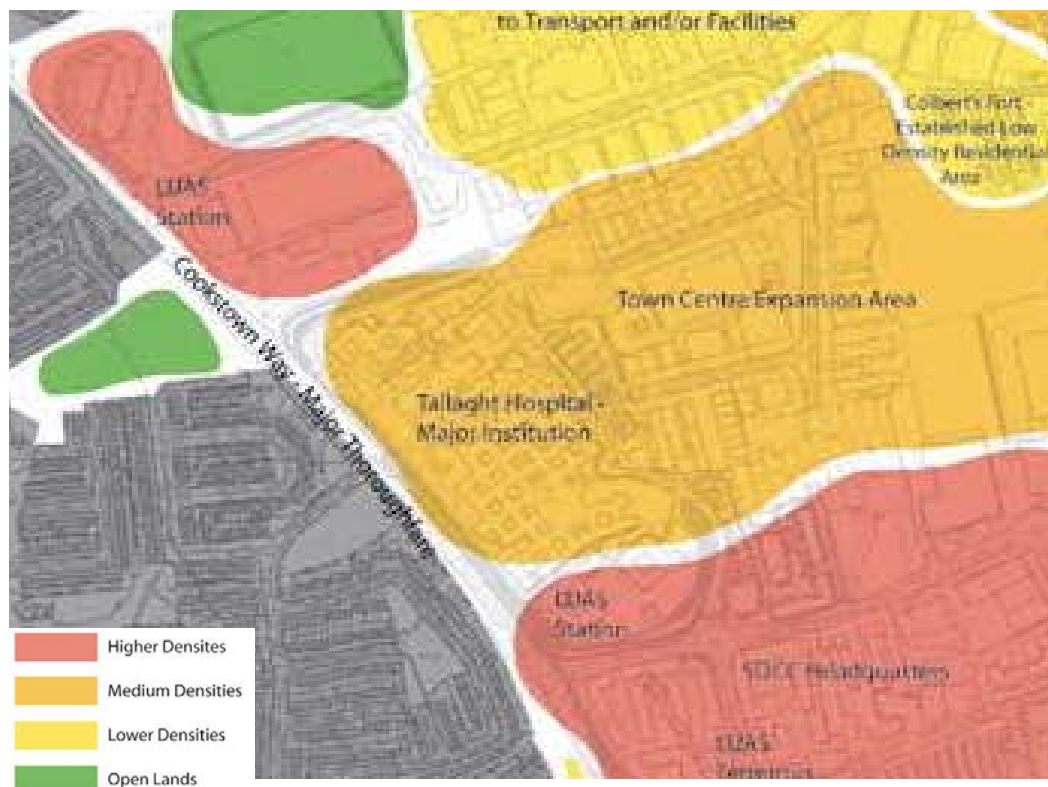
<sup>66</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 136.

<sup>67</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 136.

### Development Standards - Density Strategy

With regard to land use is it an objective of the Local Area Plan “to disperse land uses throughout the area in a sustainable manner that accounts for proximity to transport and services and takes into account local conditions and aspirations<sup>68</sup>”. The LAP states that medium density areas are located within sections of Tallaght Hospital which are not as well served by public transport and facilities as the higher density areas, see Plate 16 below. However, sufficient levels of service are available and/or can be built upon to sustain more intensive levels of development than currently exist<sup>69</sup>.

**Plate 16: Extract from the Density Strategy from the Tallaght Town Centre Local Area Plan, 2006**



### Development Standards - Land Use

The Land Use Strategy designates areas for a number of uses including Institutional Lands, stating that these lands will cater for the expansion of existing institutional facilities, see Plate 17 below. Specifically with regard to the Tallaght hospital campus the LAP states that ‘land uses should be primarily associated with the Hospital<sup>70</sup>’.

<sup>68</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 26.

<sup>69</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 28

<sup>70</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 101

### Plate 17 Extract from the Land Use Strategy of the Tallaght Town Centre Local Area Plan



With regard to institutional lands it is also an objective of the Local Area Plan to ensure access to all such areas is maximised, and major spaces are linked via amenable pedestrian routes<sup>71</sup>. In this regard, the Local Area Plan encourages the construction of plazas and squares at various locations including entrances to major destinations such as *inter alia* the hospital. In addition, the Local Area Plan notes the potential for the Cookstown distribution reservoir to be used as a new neighbourhood park/playing field through funding by adjoining developments and in conjunction with the hospital, who may wish to use part of the reservoir as an emergency helicopter landing pad<sup>72</sup>.

#### Development Standards - Layout

Plate 18 below is an extract from the Tallaght Town Centre Masterplan Map which provides a layout for the Tallaght Hospital campus area. A list of objectives were devised for the Masterplan Area in accordance with the Vision Statement including *inter alia* to:

- *"Facilitate the future development of Tallaght Town Centre as a County Town that accords with a comprehensive vision for the area."*
- *Identify a range of opportunities to intensify development in Tallaght Town Centre in accordance with local conditions and aspirations<sup>73</sup>."*

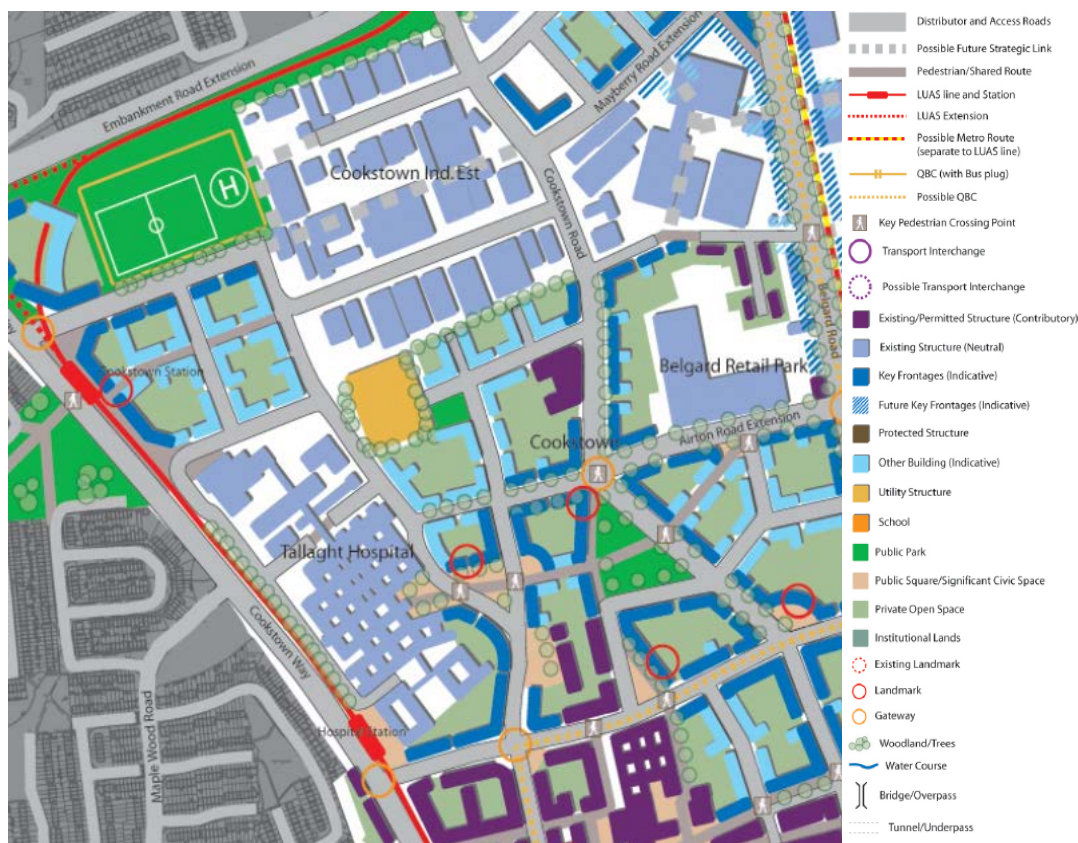
It should be noted that the layout shown is indicative.

<sup>71</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 34.

<sup>72</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 34.

<sup>73</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 20.

Plate 18 Extract from the Tallaght Town Centre Local Area Plan Masterplan Map, 2006



The indicative layout for the Tallaght Hospital campus lands, as above, was informed by the assessment of the hospital campus as contained in Chapter 4 of the Masterplan. Items identified in this assessment included *inter alia*:

- That some mixed use non-hospital related development along Belgard Square may be desirable to encourage the development of a more active street frontage.
- The area should be made significantly more permeable to vehicles and pedestrians.
- East/West pedestrian access across the southern and northern extremities of the site would provide direct access to the LUAS, 'Hospital' and 'Cookstown' Stations.
- That any major redevelopment should seek to build up existing structures in preference to the further sprawl of low lying buildings.
- That a new public square should be provided adjacent to the main hospital entrance.
- There are opportunities for gateway buildings at the existing entrance point off Belgard Square and on the corner of Cookstown Way.



### Development Standards - Transport

In relation to the above, it is an objective of the Local Area Plan to facilitate the expansion of the public transport network including *inter alia* "an improved QBC network both within and at key access points to the Town Centre along routes such as... Belgard Square North<sup>74</sup>". Access to the Tallaght hospital campus by public transport may also be improved through the LAP's implementation measures, specifically "identifying opportunities for interchange including park and ride, bus stops, taxi ranks, bicycle parking etc. where appropriate, in conjunction with major development proposals in the Town Centre. The Belgard and Cookstown Luas stops may be particularly suitable for park and ride<sup>75</sup>". These proposed measures also provide an indication of the level of upgrades envisaged for the area surrounding the Tallaght Hospital Campus (Tallaght hospital campus) which may require funding.

A Traffic Impact Assessment is required to be submitted for all significant development proposals that generate a need for approximately 50 or more car parking spaces<sup>76</sup>.

### Development Standards – Car Parking

The Local Area Plan sets out car parking requirements for certain uses, however, the land use 'hospital' is not included amongst these. Where specific uses are not specified the Local Area Plan states the parameters contained in the South Dublin County Development Plan will be applicable.

### Development Standards - Access and Permeability

The outcome of the Masterplan was that improvements in accessibility and permeability are required to ensure that the Hospital becomes a more integrated part of the Town Centre<sup>77</sup>. The Masterplan states that this can be achieved by creating additional entrance points and new streets and spaces that are fronted by development that is more responsive to the public domain i.e. a new public square and direct access to LUAS. In addition the Masterplan states that such alterations would also enable public transport (buses) to operate through the hospital site in the future.

### Development Standards - Energy Efficiency

The Local Area Plan states that all new development within the Town Centre should seek to be as energy efficient as possible by utilising renewable energy sources and passive solar design techniques. In this regard it requires that this process is to be documented via the Design Statement to confirm that best practise methods have been followed in regards to Energy Efficiency and accompanied by Shadow Diagrams to demonstrate solar access levels and the impacts of any overshadowing on surrounding lands<sup>78</sup>.

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<sup>74</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 32.

<sup>75</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 32.

<sup>76</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 152.

<sup>77</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 104.

<sup>78</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 149.

### 12.5.3 Connolly Hospital

#### 12.5.3.1 Fingal County Development Plan, 2011 – 2017

The Connolly Hospital campus is located in the administrative area of Fingal County Council and therefore, the Fingal County Development Plan 2011 - 2017 is the relevant statutory plan. The Fingal Development Plan sets out Fingal County Council's policies and objectives for the development of the County over the Plan period.

#### Zoning and Site Specific Objectives

Under this Plan the Connolly Hospital campus is zoned CI – "Community Infrastructure", see Plate 19 below, with the objective to "provide for and protect civic, religious, community, education, health care and social infrastructure." The Vision for such lands is to:

*"Protect and promote an inclusive county, accessible to all members of the community, facilitating the sustainable development of necessary community, health, religious, educational, social and civic infrastructure. A wide range of different community facilities, civic facilities and social services exist within the County ranging from those of regional importance such as education and health facilities, to those of local and neighbourhood importance... It is important to facilitate the development and expansion of such services in order to deliver a quality environment whilst improving the quality of life for all."*

Hospital (for public operators only) is Permitted in Principle under the CI zoning. Local Objective 539 also applies to the Connolly hospital campus which seeks to "facilitate and promote synergies between Connolly Hospital and related Industries (onsite)".

#### Plate 19 Extract from Fingal Development Plan Maps, 2011 - 2017





As indicated on Plate 19 above, the Connolly Hospital campus could also be described as being located in a Transitional Zone about which the Fingal Development Plan states it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones<sup>79</sup>, as supported by Policy Objective Z04. In this regard, Objective Z06 seeking to *"ensure that developments ancillary to the parent use of a site are considered on their merits"*.

### Surrounding Land Use Zonings

The campus is bound to the south by lands zoned Objective HA, to *"protect and enhance high amenity areas"*, to the east and west by lands zoned Objective OS to *"preserve and provide for open space and recreational amenities"* and to the north by lands zoned Objective RS to *"provide for residential development and protect and improve residential amenity"*. The open space lands to the south, east and west also contain the specific objective to *"protect & preserve trees, woodlands and hedgerows"*, with the lands to the east also containing Local Objectives 540 and 542 as follows:

- *"540 – "Facilitate the provision of public access to this open parkland and the necessary footpath network, landscaping and related development."*
- *542 – "Provide for a hospice"*

### Policy

One of the main aims of the Fingal County Development Plan is to provide for the future well-being of the residents of the County by ensuring the provision of necessary infrastructure and community facilities<sup>80</sup>. According to the Fingal County Development Plan the term *'community infrastructure'*, includes infrastructure and facilities such as public health facilities, stating that the Council will continue to support the development of community infrastructure where there is a need for such<sup>81</sup>. In this regard, community infrastructure is recognised as one of the five main themes in achieving high quality urban areas, specifically including easy access to well-resourced schools and health services. Objectives CI03 seeks to *"ensure community facilities are flexible in their design and promote optimum usage"*.

In relation to lands zoned for Community Infrastructure, the Fingal County Development Plan states that the objective of this zoning is to provide for and protect community and social infrastructure and facilitate the sustainable development of necessary community, health, religious, educational, social and civic infrastructure<sup>82</sup>. Specifically with regard to health centres/services the Fingal Development Plan identifies Connolly Hospital as one of the three public hospitals within Fingal and notes the aim of the Primary Care Strategy, 2001 to promote the development of a team-based approach to service provision. The Fingal Development Plan states that consequently, practices wishing to develop their premises are encouraged to provide a *"one stop"* primary health and community care service, integrated under one roof, noting the benefits in locating such medical/health care facilities in a location close by or adjacent to other community facilities, shops and public transport, such as town, district or neighbourhood centres<sup>83</sup>. In this regard, Objective CI34 seeks to:

<sup>79</sup> Fingal County Development Plan, 2011 – 2017, pg. 328.

<sup>80</sup> Fingal County Development Plan, 2011 – 2017, pg. 8.

<sup>81</sup> Fingal County Development Plan, 2011 – 2017, pg. 265

<sup>82</sup> Fingal County Development Plan, 2011 – 2017, pg. 265

<sup>83</sup> Fingal County Development Plan, 2011 – 2017, pg. 272.

*“Support and facilitate the development of health centres, hospitals, clinics and primary care centres in appropriate urban areas.”*

It is the aim of the Council to work in partnership with government agencies and the private sector to promote the sustainable economic development of the County and maximise the County's employment potential<sup>84</sup>. In addition, Objective EE09 promotes innovative economic sectors and encourages clustering which exploits links between interconnected companies and/or with third level educational institutions.

### Development Standards

The relevant development standards as set out in the Fingal County Development Plan are set out as below.

#### Development Standards – Design

In relation to design the provisions of Objective UD01 should be noted i.e. for developments in excess of 300m<sup>2</sup> of retail/commercial/office development in urban areas a detailed design appraisal has to be submitted which *inter alia* explains the design principles and design concept, demonstrates how the twelve urban design criteria have been taken into account, when designing schemes in urban areas, outline how the development meets the FDP Objectives or other Plans affecting the site, include photographs and other illustrations, outline detailed proposals for open space and outline how Green Infrastructure integrates into the scheme. In addition, contemporary architecture is generally promoted for new developments, Objective UD02.

#### Development Standards – Open Space

The aim of Fingal County Development Plan is to *inter alia* create an integrated and coherent green infrastructure for the County which will protect and enhance biodiversity, provide for accessible parks and open space, maintain and enhance landscape character. In this regard, Objective GI11 requires all new development to contribute to the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure, as appropriate, with Objective OS23 seeking the provision of green corridors in all new developments where the opportunity exists. In addition Objectives GI32, UD16 and UD17 seek the provision of green roofs and green walls as an integrated part of SuDS and which provide benefits for biodiversity, wherever possible.

With regard to open space provision Objective OS02 addresses this issue in relation to residential open space provision. In relation to institutional lands Objective OS07 seeks:

*“Retain in open space use institutional lands, landscaped demesnes and similar properties with established recreational or amenity uses, as far as practicable. However, in the event of permission for development being granted on these lands, open space provision in excess of the normal standards will be required to maintain the open character of such parts of the land as are considered necessary by the Council for this purpose.”*

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<sup>84</sup> Fingal County Development Plan, 2011 – 2017, pg. 65.

### Development Standards – Transport

With regard to employment/trip intensive developments these are to be supported by a viable Mobility Management Plan, Objectives EE05 and TO24, with Objective TO47 requiring that developers provide a detailed Traffic Impact Assessment and Road Safety Authority where new development will have a significant effect on travel demand and the capacity of surrounding transport links and taking into account cumulative effects. In this regard, those developments that are major generators of travel demand are to be guided to locations of high public transport accessibility, Objective EE06. In addition, it is noted that Table TO2 provides a list of the main Quality Bus Corridors to be implemented including Connolly Hospital bus priority.

### Development Standards – Car Parking

Table TO3b sets out the maximum Commercial Car Parking Standards which for the land use “hospital” is 1.5 spaces per bed and for the land use “Clinic and Group Medical Practices” is 2 spaces per consulting room. The Fingal County Development Plan states that the car parking standards provide a guide to the number of required off street parking spaces acceptable for new developments and that Council policy will be to manage and control it at a level appropriate to its location<sup>85</sup>. Objective TO58 seeks to “balance the car parking requirements required under Tables TO3a and TO3b against the provision of accessible public transport”. The Fingal County Development Plan states that developments located within *inter alia* 500m of a QBC or high quality bus service and/or 1000m of a Luas/Dart/ Metro/Rail station can operate effectively with less parking provision and that the required number of off-street parking spaces in such cases will be determined on merit by the Planning Authority<sup>86</sup>.

### Development Standards – Cycle Parking

With regard to cycle parking minimum requirements, outlined in Table TO1, these will be determined by the Planning Authority. Planning applications are required to demonstrate the proposals accessibility for cyclists.

### Development Standards – Water and Waste Management

Objective SW04 requires the use of sustainable urban drainage systems to minimise and limit the extent of hard surfacing and paving and requires the use of sustainable drainage techniques for new development or for extensions to existing developments<sup>87</sup>. A construction and demolition waste management plan is required to be submitted for health developments in excess of 1,250sq.m.

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<sup>85</sup> Fingal County Development Plan, 2011 – 2017, pg. 122.

<sup>86</sup> Fingal County Development Plan, 2011 – 2017, pg. 124.

<sup>87</sup> Fingal County Development Plan, 2011 – 2017, pg. 143.

## Development Standards - Energy Efficiency

The Fingal County Development Plan notes the requirements of SI 666 of 2006 European Communities (Energy Performance and Buildings) Regulations that developers of buildings greater than 1000m<sup>2</sup> must consider, during the design stage, the economic, environmental and technical feasibility of installing alternative renewable energy systems<sup>88</sup>. In this regard, Objective EN04 specifically requires details of the requirements for alternative renewable energy systems, for buildings greater than 1000sq m or residential schemes above 30 units, under SI 666 of 2006 European Communities (Energy Performance and Buildings) to be submitted at pre planning stage for consideration. These should take the form of an Energy Statement or Feasibility Study carried out by qualified and accredited experts.

The Fingal County Development Plan also seeks to improve the efficiency of existing building stock and require energy efficiency and conservation in the design and development of all new buildings (Objective EN02) while also promoting energy efficiency and conservation above the Building Regulations standards in the design and development of all new buildings. The Fingal County Development Plan also requires designers to demonstrate that they have taken maximising energy efficiency and the use of renewable energy into account in their planning application, Objective EN03.

### 12.5.3.2 Fingal Development Plan, 2017 - 2023

Fingal County Council has started its review for the Fingal County Development Plan, 2011 - 2017, and will create a new Development Plan that will shape the future growth of Fingal over the six year period from 2017 to 2023. The review commenced on Friday the 20<sup>th</sup> of March 2015 and will take up to 2 years to complete. The Pre-Draft Plan stage of the Development Plan process took place from March 20<sup>th</sup> 2015 to May 15<sup>th</sup> 2015. Following on from this it is understood that the Draft Fingal Development Plan will go on display in early 2016.

### 12.5.3.3 Blanchardstown Urban Structure Plan, 2007

The Blanchardstown Urban Structure Plan, 2007 sets out the vision, development themes and opportunities for the Blanchardstown area. In relation to the Science and Technology Theme Connolly Memorial Hospital is recognised as an existing resource. As part of the development opportunities contained in the Blanchardstown Urban Structure Plan, essential infrastructural improvements are identified including the provision of integrated educational, health and community facilities<sup>89</sup>.

The Blanchardstown Urban Structure Plan identifies 11 no. development opportunity areas which includes *inter alia* Area 5: Connolly Hospital – a centre of excellence in health care specialisms with the uses of medical specialists/facilities/clinics and residential identified. The Blanchardstown Urban Structure Plan describes the hospital as being a major resource asset to Blanchardstown and as being well placed to advance as a model of excellence in health care and medical specialisms. The Plan states that the rationalisation of existing buildings would release land for development<sup>90</sup>.

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<sup>88</sup> Fingal County Development Plan, 2011 – 2017, pg. 151.

<sup>89</sup> Blanchardstown Urban Structure Plan, 2007, pg.14.

<sup>90</sup> Blanchardstown Urban Structure Plan, 2007, pg.25.

With regard to open space, the Tolka Valley Park is located west and south of Connolly Hospital campus. It is a stated objective of the Blanchardstown Urban Structure Plan to preserve and develop the Liffey Valley, Tolka River Valley Park, the Royal Canal and the lands at St. Catherine's Leixlip as public amenities<sup>91</sup>. The Blanchardstown Urban Structure Plan recognises the necessity for overall national policy in respect of the integration of health and other social policies as a challenge<sup>92</sup>.

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<sup>91</sup> Blanchardstown Urban Structure Plan, 2007, pg.11.

<sup>92</sup> Blanchardstown Urban Structure Plan, 2007, pg.11.

## 13. Environmental Impact Statement and Natura Impact Assessment

### 13.1 Environmental Impact Statement

The project, which is fully described in Chapter 2 of the EIS, comprises a number of developments:

- within – or associated with – the main project site on the campus of St. James's Hospital, Dublin 8 are:
  - a new children's hospital and associated Family Accommodation Unit, sited in the west of the Campus;
  - a new Children's Research and Innovation Centre, sited along James's Street; and
  - associated works to boundaries, roads, entrances, parking areas, hard and soft landscaping etc. within the application site boundary;
- a construction compound at Davitt Road, Dublin 12, which is directly associated with the development at St. James's Hospital campus.
- a children's hospital satellite centre at Tallaght Hospital, Dublin 24; and
- a children's hospital satellite centre at Connolly Hospital, Blanchardstown, Dublin 15

Each of these elements operates in conjunction with each other, forming one indivisible, integrated project. This fact has been recognised by An Bord Pleanála which has advised in a letter dated 10<sup>th</sup> July 2015 that the proposed integrated National Paediatric Hospital development would be strategic infrastructure within the meaning of Section 37A of the Act (as amended).

As one single integrated development all elements are included and have been assessed as part of the EIS. For ease of reference the EIS is presented under the headings of St. James's Hospital campus and Davitt Road, Tallaght Hospital and Connolly Hospital being the four development locations covered by the project and also being within three separate Local Authority areas. A full assessment of the development(s) proposed on these sites is provided under the relevant heading ensuring that the information relating to each site is readily identifiable.

The EIS enclosed with this planning application documents the significant environmental impacts predicted for the proposed development. The EIS sections describe the project with respect to the environmental headings contained in the EPA Guidelines as follows:

- Introduction
- Description of the Proposed Development
- Planning and Development Context
- Examination of Alternatives
- Human Beings
- Traffic & Transportation
- Soil and Geology
- Hydrogeology and Hydrology
- Flora and Fauna



- Waste Management
- Noise and Vibration
- Air Quality and Climate
- Micro Climate
- Landscape and Visual Impact Assessment
- Archaeological Heritage
- Architectural and Cultural Heritage
- Material Assets – Site Services
- Interactions and Potential Cumulative Impacts

A brief overview of the significant environmental impacts is provided in the non-technical summary document attached to the documentation, however, for a comprehensive assessment of the environmental impacts please see the EIS submitted as part of the planning application pack.

### 13.2 Natura Impact Statement

The attached Natura Impact Statement (NIS) was prepared by Scott Cawley Ltd. in association Brady Shipman Martin, on behalf of the applicant.

It provides information on, and the potential for, the integrated National Paediatric Hospital Project, (comprising a new children's hospital, associated Family Accommodation Unit, a Children's Research and Innovation Centre, and related works all at St. James's Hospital Campus, Dublin 8 as well as provision of a construction compound at Davitt Road, Dublin 12, and a 2 new children's hospital satellite centres at Tallaght Hospital, Dublin 24 and Connolly Hospital, Dublin 15.) to have a significant effect, either individually or in combination with other plans or projects, on any Natura 2000 sites (hereafter 'European sites'; please refer to the NIS for definitions). The information in the NIS forms part of, and should be read in conjunction with, the documentation accompanying the application for permission for the proposed development.

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter 'the Habitats Directive') requires that, any plan or project not directly connected with or necessary to the management of a European site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to AA of its implications for the site in view of the site's conservation objectives. For the purposes of the application for permission in respect of the proposed integrated National Paediatric Hospital Project development, the requirements of Article 6(3) have been transposed into Irish law by Part XAB of the Planning and Development Act 2000, as inserted.

The possibility of there being a significant effect on a European site will generate the need for an AA to be carried out by the competent authority for the purposes of Article 6(3). Accordingly, a screening for AA in respect of an application for consent for proposed development must be carried out by the competent authority (in this case, An Bord Pleanála) in order to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on any European site. A Stage Two AA is required if it cannot be excluded, on the basis of objective information, that a proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site. The (Stage One) Screening operates merely to determine whether a (Stage Two) AA must be undertaken on the implications of the plan or project for the conservation objectives of relevant European sites.

The NIS comprises information to enable An Bord Pleanála to perform both (i) a Stage One Screening for AA, and (ii) any subsequent Stage Two AA required. The information in relation to the Screening Stage is presented in Section 4 of this document which comprises the Screening Report. Whereas, information to enable the Board to perform its statutory function to conduct a Stage Two Appropriate Assessment is presented in Sections 5, 6 and 7 (in the NIS).



## 14. Economic Regeneration and Community Benefits

### 14.1 Introduction

The St. James's Hospital campus has been a focus for delivery of healthcare for a long period but is now poised for unprecedented investment that will both transform the healthcare experience for visitors to the campus and present a unique opportunity to stimulate the wider regeneration of the surrounding area. The Mercers Institute for Successful Ageing (MISA) is already under construction and the proposed National Paediatric Hospital and Children's Research and Innovation Centre will add significant new investment to the campus.

Mindful of the need to quantify these significant benefits, the NPHDB has commissioned two core reports as follows:

- National Paediatric Hospital – Local Regeneration Opportunities – Urban Initiatives Studio (July 2015)
- Harnessing the Potential – Maximising the Community Benefit from the New Children's Hospital – NPHDB (July 2015)

These reports are incorporated into the planning application package and supporting documentation as appended to Chapter 5.0 of the EIS (Human Beings).

### 14.2 Background

The Reports indicate that over the past decade a compelling case for the development of a new children's hospital has emerged. The strategic importance of the project has been repeatedly reflected in public policy commitments (supported by expert studies) and its development will help deliver a step-change in healthcare outcomes for Ireland's children and young people.

The new children's hospital will bring together on a single site, the Children's University Hospital, Temple Street; Our Lady's Children's Hospital, Crumlin and children's services at Tallaght Hospital, thus enabling their re-use for other purposes. The proposal will be the largest healthcare project of its kind ever to be undertaken in the State, representing an investment opportunity c. €650m and is one of a handful of children's hospitals in development anywhere in the world at this point in time.

The workforce of the new children's hospital will include medical, nursing, clinical support and non-clinical staff. The hospital will be supported by facilities such as a hospital school and a research and innovation centre. Retail and restaurant space will also be provided. These ancillary facilities will provide additional opportunities for employment and economic benefit and the new hospital will lead to the creation of a range of social and economic activities in the wider area.

The two reports referenced above are important in that they help to quantify these positive economic and community impacts as reflected below:

### 14.2.1 Local Regeneration Opportunities Report (Urban Initiatives July 2015)

This Study essentially reviews the potential regeneration impacts in terms of the current characteristics of the neighbourhood surrounding the St. James's Hospital campus; the ways in which the hospital proposals can support community regeneration and then goes on to highlight how the scheme will reinforce policy initiatives and facilitate local regeneration opportunities.

The work indicates that the hospital will be located in a historic part of Dublin where there are a number of iconic landmarks. Equally, however, the area has a polarised socio-economic profile, with long term unemployment higher than the State and Dublin averages and this plays a key role in the area's economic disadvantage. There are few signs of the existing hospital, despite its large employment base, generating economic activity in the area. Furthermore, connections in the neighbourhood are poor and marred by inactive frontages and vacant buildings. Generally, the environmental quality needs improvement.

The Study references several positive examples of hospital led regeneration and encourages NPHDB to learn from these case studies in the UK and abroad. The authors of the report contend that investment in the St. James's Campus Hospitals will help change the current negative perceptions of the area and bring more life and activity to the local area. This catalytic effect will help support the economic renewal process supported in the Dublin City Development Plan 2011-2017 and will facilitate promotion of the proposed innovation corridor along Naas Road, west of the city centre.

The proposals could also assist in bringing forward key local regenerations schemes and the potential for some of these are identified in the report. Finally the report underlines the need for the NPHDB to collaborate closely with other key stakeholders (including Dublin City Council) to deliver these local regeneration projects and provide tangible benefits to local people.

The second report authored by NPHDB focuses less on the spatial dimension of regeneration and more on the economic and social aspects. The key points are outlined below:

### 14.2.2 Harnessing the Potential – Maximising the Community Benefit from the new Children's Hospital – (NPHDB July 2015)

In this report (which relates to the St. James's Campus developments only), the authors argue that the new children's hospital is unique in both its nature and magnitude and provides a rare opportunity to facilitate the development of the surrounding area. They contend that it is essential to ensure that appropriate actions are taken to maximise potential benefits to the local community. To this end, the study seeks to profile the area; consider the range of opportunities that may arise through the development and operation of the St. James's campus and to identify the ways in which the community can avail itself of these new opportunities.

The large scale and nature of the new children's hospital which will result in an additional 3,000 staff at the St. James's Hospital campus, clearly represents a major economic opportunity for the area. The report identifies three potential sources of community benefit:

- Employment and education;
- Enterprise development; and
- Regeneration of the local community

### 14.2.3 Employment and Education

The new children's hospital will be a centre of social and economic activity and will provide a broad spectrum of opportunities for jobs. These opportunities will require education and training, including apprenticeships. Table 3.7 (page 19) in the Report sets out the local potential for employment and this information is summarised below.

#### 14.2.3.1 Construction Phase of the National Paediatric Hospital Development –

The Report notes that the development will be a key employer during the envisaged four years construction and commissioning period (2015-2019) providing many job opportunities for construction workers and a large range of professional service firms. It is estimated that some 1,700 people will be directly engaged in with around 250 works engaged in supporting services. Hence the construction phase would provide job opportunities for some 1,950 people, a very significant number. This would provide a major benefit to the Exchequer in terms of tax take. The additional indirect employment (250) will be created in local shops and by other service providers in the area; including those supplying building and other materials to the project and catering and security administration.

#### 14.2.3.2 Operational Phase of the National Paediatric Hospital Development

The study identifies that some 691 additional staff - over and above today's levels – may be required when the hospital opens. 447 of these will be hospital staff, additional to those transferring from the existing children's hospital facilities. In addition, as a consequence of the national churn of employees, there will be average annual 'replacement' demand of around 150 jobs over this period.

The new children's hospital will therefore be a significant catalyst for the retention and creation of some 3,000 long term and sustainable operational jobs and nearly 2,000 construction and related jobs over the hospital's construction phase. This will have a substantial and long term positive impact on the surrounding area and the Dublin City economy as a whole.

#### 14.2.3.3 Local and International Enterprise Opportunities

Having regard to the desire of the NPHDB to drive significant community gain and wellbeing through the proposals, the study has appraised the potential for social enterprise and wider enterprise opportunities. It concludes that the development can generate a range of employment through social enterprises, especially in locally traded services, although the establishment of capacity building programmes will be necessary.



The work goes on to emphasise the need to capitalise on the proposed research and innovation centre, which, alongside the hospital's leading healthcare research offer, can act as a magnet to other related opportunities. One of the main drivers of such economic activity from hospital research derives from industry partnerships and the creation of medical hubs. International experience, according to the study, underlines the key role of such clusters in providing opportunities for technological advancements. Given that Ireland is currently Europe's largest Medical Technology hotspot and is an internationally recognised centre of excellence, the new children's hospital has a huge opportunity in this supportive environment to cement its growth and raise the State's profile as an international centre of paediatric care. In turn, this will provide significant benefits in terms of international investment; research capability and attraction to international medical professional and students, as a place of work.

It is concluded that these new world class medical services at St. James's could stimulate investment and a virtuous circle of research that, it is hoped, will create a hub around which high quality research and innovation companies will cluster. For this reason, the National Paediatric Hospital development is a scheme of national and potential international importance, both in medical and economic terms.

#### 14.2.3.4 *Opportunities for Regeneration*

The Study (section 3.3) explores the potential for the new children's hospital to encourage community regeneration. It references the concept of Strategic Development Zones, as they are referenced in the Issues paper for the draft Dublin City Development Plan 2016-2022 and how these may act as an enabler to facilitate the children's hospital scheme as a tool to promote local regeneration. It points to the new hospital, a major employer like a hospital acting as a regeneration anchor, thereby catalysing local investment and development opportunities.

The Report identifies two areas in which the hospital can stimulate community regeneration:

- (a) **Through capitalising on the existing and expanded labour force on the campus** – by opening up the campus to increased movement and interaction with adjoining areas, this will facilitate local expenditure and enhance the community perceptions of the campus as a place to work and with which to interact from a community perspective.
- (b) **Through attracting complementary activities to the area over the longer term** – the campus will act as a key anchor to the western 'innovation corridor' (Naas Road) and thereby attract additional activities to further boost growth and critical mass. Given its scale and focus of activity, the report argues that it is expected that enterprise and academia will want to partner with new children's hospital for collaboration and research purposes.

The Report goes on to describe the various policy levers which can be adopted to maximise community benefits arising from the development. These include:

- Training and activation programmes;
- Enterprise support;
- Public procurement and use of 'social clauses' in contracts for procurement of services; and
- Communication and awareness raising measures.

The NPHDB has noted these recommendations and will discuss these with a range of partners, including Dublin City Council, to explore potential strategies and programmes that will need to be put in place to ensure that the regeneration benefits of the new children's hospital are distributed as widely and effectively as possible to the local communities.

#### 14.2.3.5 The Benefits

The "Harnessing the Potential" report commissioned by NPHDB confirms that the children's hospital proposals at St. James's Campus will generate a wide range of positive benefits for economic regeneration, both local and wider, and will offer major potential for significant community gains.

From an economic and development point of view these benefits include the following:

- Investment of c. €650m in development in a new state of the art children's hospital facility to service the whole country's population.
- The health sector represents one of Dublin's economic and social strengths and thus is supported by the extant Dublin City Development Plan 2011-2017 (Policy E5) and the emerging development plan. The new children's hospital will be an integral part of the knowledge economy critical to future national and local economic success, driving clustering of associated economic activities and research.
- The new children's hospital will be a flagship development that can become the civic heart of a transformed area and act as a catalyst for new mixed use development of underused/vacant sites which will help inspire new investment confidence in this quarter of the city.
- The proposals will result in some 3,000 permanent full time equivalent (FTE) jobs, including posts for around 700 new staff, during the operational phase. In addition, circa 150 replacement posts will be available annually.
- During the construction phase there will be employment for around 1,950 (FTE) people, including 250 in supporting services; over the four year build and commissioning period.
- Appropriate policy measures will be put in place to guarantee that a high proportion of the jobs available are offered to the local workforce and local procurement initiatives are implemented.
- New training measures (including apprenticeships) will be delivered to encourage take up of employment opportunities by local (especially young) people.
- The development of the new children's hospital will enable the existing children's medical facilities at the Children's University Hospital, Temple Street, Our Lady's Children's Hospital, Crumlin and children's services at Tallaght Hospital to be redeveloped/re-used for alternative uses.
- More investment in the St. James's site will improve local environmental quality and public accessibility.

The NPHDB has a key objective which seeks to maximise community benefits from the proposed development. At a national level, the project will reduce health inequalities for children and young people across the island of Ireland. In this regard the new hospital provides major potential for a range of groups within the local community:

- Long term and youth unemployed who can secure jobs during the delivery and operational phases of the development.
- Landowners and developers whose sites investment potential will be enhanced by the economic impact of its proposals.
- Social enterprises and small and medium enterprises who can take advantage of the increased level of economic activity.
- International companies and investors for whom the hospital may act as an economic driver and magnet for investment/research.
- Young people in the area who will have better access to training, work placement and progressive careers locally.
- Local suppliers who will find greater business opportunities locally as the economy grows.
- Hospital staff who will be attracted to live in the area as the process of regeneration takes hold.

The large scale and nature of the proposals means that the community gains above combined with positive economic benefits and the availability of a greater investment opportunities for property development will help to drive a virtuous circle of regeneration, as workers find employment, enterprises flourish, research and innovation expand; the local environment improves and the quality of life and wellbeing of local people is enhanced. On this basis, the economic and community regeneration case for the new children's hospital is compelling.

## 15. Planning Appraisal

### 15.1 Overall Assessment incl. need for proposed development

By 2020, it is intended that the new children's hospital will have replaced Dublin's three children's hospitals – Our Lady's Children's Hospital Crumlin, The Children's University Hospital, Temple Street, and the National Children's Hospital at Tallaght. Both Crumlin and Temple Street, constructed in 1956 and 1872 respectively, have an infrastructure which is no longer fit for purpose. The National Children's Hospital, Tallaght, is small, particularly in terms of delivery of specialist services. The new children's hospital will provide national paediatric specialist (tertiary) care and secondary general paediatric care for children in the Greater Dublin Area. In numerical terms, secondary general paediatric care services makes up the greater part of the clinical services to be provided.

It is critical, therefore, that the development of a new children's hospital is commenced as soon as may be possible, particularly in light of the delays experienced as a result of the refusal of the Mater application. While the regeneration benefits of the proposed development have been set out above, the key benefit of the proposed development is the provision of a state of the art medical facility for the children of Ireland. This is paramount in the consideration of the application as set before the Board and, where local impacts have been identified or alternative locations may be suggested, it is important to contextualise these issues having regard to the absolute need for the proposed development and the priority given to it by government. In the Report attached to this application, the NPHDB states:

*"Ireland needs a new, national children's hospital where all specialist care is provided by multi-specialty and multi-disciplinary teams. This new model will result in improved delivery of care to the child and an enhanced experience of the child and his/her family. The establishment of a department of secondary paediatric medicine in the new children's hospital will co-ordinate and improve that care for the children of the greater Dublin area. The new children's hospital has been planned as a large unified children's hospital. It has been designed to facilitate optimal clinical care, efficiency and the patient and family experience. The Emergency Department, Paediatric Intensive Care Department, Operating Theatres and the Helipad are all stacked one above the other, vertically adjacent, and facilitating rapid, safe transfer of the sickest children. Every standard inpatient room is single with en-suite facilities and a bed for accompanying parents. The orthopaedic outpatient service, a high user of X Ray facilities, is located beside the Radiology Department. The outpatient departments have been designed with the medical consulting examination rooms and the multi-disciplinary support facilities in the same area to reduce patient movement and inconvenience and deliver a cohesive multi-disciplinary service in one place. The new hospital is specifically designed to deliver high quality, specialist, efficient, effective and safe clinical care in a manner in which it cannot be delivered in the current three Dublin children's hospitals. The proposed facility promises a new era in the delivery of excellent healthcare to the children and young people of Ireland." (NPHDB, 2015)*

With the importance of the above self-evident, the question that arises is to where the planning balance lies in terms of any identified negative impacts set against the highly significant well-being, health, economic and social and community benefits that would accrue as a result of granting permission for the proposed development. The status of the proposed development as Strategic Infrastructure Development, as confirmed by An Bord Pleanála, allows the Board to consider the proposal under a specific set of criteria as provided for in Section 37G of the Planning and Development Act, 2000 (as amended).

In this regard, the key planning issues to consider, having regard to the Inspector's Report on the pre-application consultations, are identified as follows:

- The need for the proposed development
- The model of care being proposed
- The site selection process / examination of alternatives as it relates to EIA legislation
- Planning policy compliance
- Development management considerations, including amenity impacts, construction impacts as set out in the EIS
- Existing hospital operations
- Traffic and transportation
- Cultural and built heritage
- Community gain and urban regeneration
- The operation of the proposed helipad at St. James's campus
- Site capacity

The majority of the above issues are largely relevant to the St. James's Hospital campus and, as such, will be dealt with hereunder with specific respect to those elements of the project.

The planning issues that relate to Davitt Road and the children's hospital satellite centres at Tallaght and Connolly are addressed in turn thereafter.

## 15.2 Model of Care for the National Paediatric Hospital Project

The Model of Care for the new children's hospital has been developed and a copy of this is attached to Appendix I of the document titled '*The Clinical Case for the New Children's Hospital*', prepared by the NPHDB and submitted with this application. This document describes the model of care for the children's hospital satellite centres and describes how these are an essential and integral part of the new children's hospital model of care. The aim of the children's hospital satellite centres is to promote and guarantee the provision of high quality, safe clinical care to every child, every time, he or she attends the children's hospital satellite centres

As set out in the aforementioned report there are currently three children's hospitals in Dublin which fulfil local and national functions. The remit of the new children's hospital has two separate but linked areas of responsibility. It will provide tertiary / quaternary (highly specialised) services on an all-island basis and secondary paediatric care (less severe, complicated and more common conditions) to the Greater Dublin Area (counties Dublin, Wicklow, Kildare and parts of Meath). National and international evidence shows that children with complex, rare and life-threatening conditions do best by centralising highly specialised and complex tertiary / quaternary services<sup>93</sup>. Secondary care, by its nature less complex and requiring less specialised equipment and staff, should ideally be delivered as close to the child's home as possible.

The reasons for having the two children's hospital's satellite centres working alongside the new children's hospital have been clearly set out by the NPHDB in this Report and are as follows :

1. *To provide secondary general paediatric care closer to home to children and young people in the greater Dublin area.*
2. *To provide safe emergency and urgent care to the children and young people of the greater Dublin area.*

*Each year, approximately 117,000 children attend the emergency departments of the current three children's hospitals. Within this number, there is a mixture of emergencies and urgent care. The vast majority (approximately 85%) of children attending the existing three emergency departments are assessed, treated and discharged home. The projected clinical activity for emergency/urgent care department visits for the new children's hospital in 2020 is approximately 126,340. There is no paediatric emergency department in the world which sees as many as 126,340 children annually in a single unit. Most large specialist children's hospitals would see between 50,000 – 90,000 children in their emergency departments annually. The provision of urgent care in the two new children's hospital satellite centres addresses this issue by providing urgent care to approximately 25,900 children in each of the two satellite centres thereby reducing the projected number attending the new children's hospital emergency department to 74,540 children.*

3. *To provide a safe, local secondary paediatric service which will meet the local community's needs and which will reduce inconvenience for children, young people and their families.*

*The new children's hospital satellite centres will provide ambulatory services. Ambulatory care refers to paediatric healthcare services provided on a scheduled outpatient, day care or rapid access basis and includes diagnosis, observation, treatment and rehabilitation services. The local catchment area for the greater Dublin area is a densely populated area. It includes counties Dublin, Kildare, Wicklow and parts of Meath and has a large child population. The two new children's hospital satellite centres will provide daily (Monday to Friday) rapid access, general paediatric, developmental, fracture and chronic disease clinics and will work closely with local primary care and community health services.*

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<sup>93</sup> NPHDB, July 2015



*Access will be close for the local population and those with access to the M50 and will involve less interruption of the educational day for children and young people and of the working day for their parents.*

It is submitted that the Model of Care for the new children's hospital development is driven by a new clinical model and not as a result of any inherent capacity issues at any of the sites. In this regard it is worth noting (as set out in Chapter 2 of the EIS) that the decision to pursue the "hub and spoke" model of paediatric care was taken in advance of the selection of the St. James's site for main hospital building. Thus, the question of the form of the development as proposed is not one of planning and development priorities, restrictions or reasoning, rather is one with a sound clinical basis and one that prioritises the health of the children of Ireland. It is a strategy set out by Government at a national level and, as such, is not the subject of this application. In this regard, we would ask the Board to consider that the constituent elements of the project form an integrated new paediatric hospital project and, as such, should be granted as applied for.

### 15.3 Site Selection Process/Examination of Alternatives

Following the refusal of planning permission for the Mater proposals, the NPHDB recognised that the whole question of site selection for new children's hospital would need to be appraised from first principles. It would need to be demonstrated conclusively that consideration of alternative sites for the development has been undertaken systematically through a comprehensive and evidence based analysis of the potential options available.

The 'Examination of Alternatives' section of the EIS (Chapter 4), set out clearly an overview of potential alternative sites, development concepts and designed examined by NPHDB prior to the final selection of St. James's Hospital Campus as the preferred location. The work also covers the consideration of alternatives for the two satellite sites at Tallaght Hospital campus and Connolly Hospital campus.

*"At the outset, I consider it important to point out that the role of An Bord Pleanála is not to select a site for any particular development. The role of the Board is to consider the merits of the development proposed on the subject site in respect of proper planning, sustainable development and environmental effects."*<sup>94</sup>

The analysis set out in the EIS is cognisant of the complex interplay between national health care policy and the national, regional and local spatial planning policy framework. Hence, the work gives appropriate weight to the hierarchical approach referenced in the EPA Guidelines in relation to its consideration of, on the one hand, national and strategic health policy and legislation and on the other, recommendations in expert reports, in particular, the Clear Martin Report with regard to the weight to be attached to relevant planning and environmental matters in this decision.

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<sup>94</sup> Inspector's Report, PL29N.PA00024

At each material level, the alternative sites have been evaluated through a site selection process which has systematically and sequentially worked through the various options in the context of defined criteria. Thus, at national-Governmental- level, it was determined that for health service delivery and other reasons, Dublin was the right location for the new children's hospital. Following Cabinet endorsement of this strategic decision and the subsequent refusal of the Mater proposals, the Dolphin Report was commissioned to review the options for progressing construction of the scheme, including analysis of the potential locational options. In order to delve further into the planning considerations highlighted in the Dolphin work, the subsequent Clear Martin Report assessed the planning merits of the short listed options, namely Connolly Hospital, the Coombe, the Mater, St. James's Hospital and Tallaght Hospital sites.

Having received these reports, the Government had a comprehensive and fully evidenced basis upon which to make a decision on the site of the new children's hospital. This decision was made in November 2012 when it was resolved to locate the development to St. James's Hospital Campus, following the NPHDB's confirmation that the site for the hospital could be enlarged to address a technical concern highlighted in the Clear Martin Report.

This approach and the technical evidence base informing the decision is robust and complies with relevant legislative requirements with regard to the selection and evaluation of alternative sites.

Having identified the most appropriate location, the analytical work then progressed to consider the specific local issues associated with the scale, content and design of the new children's hospital at St. James's campus. This work had regard to recommendations in the Clear Martin Report regarding the site masterplan and the site constraints and conceptual design options that enabled factors such as scale and massing overshadowing, visual impact, access and parking to be subject to a detailed review and comment by a range of stakeholders. The implications of each of these conceptual options were assessed and a short list of preferred designs drawn up. A final sieving process involving further technical and client appraisals informed by extensive stakeholder and public consultation, resulted in the application scheme being selected and refined accordingly.

It will be evident from this summary of the site selection process adopted by the NPHDB that a wide range of alternative sites and development options have been carefully examined at each successive stage – national policy, regional and local policy; site selection, brief development; site conceptual plan and detailed building design. At each milestone in this process, it can be demonstrated that the evaluation has been evidence based; rational and robust. Mindful of the history of the evolution of the National Paediatric Hospital development, NPHDB has been fully aware of the need to ensure that the process is transparent and comprehensive in terms of its analysis of all of the material factors that will inform the planning decision ultimately made by the An Bord Pleanála.

In NPHDB's view, the process adopted not only meets, but exceeds, expectations of what might be expected in relation to a public policy decision of this type and relevant legislative requirements as regards the need to outline the main alternatives and the main reasons for the choice of site.

Critically, the choice made will result in the best outcomes for the health care of children and young people in the country, reducing health inequalities and generally improving the well-being of this cohort of the population. This view has been a key reason for the decision taken alongside other important factors, including economic, land use and planning policy considerations.

## 15.4 The New Children's Hospital at St. James's Hospital Campus

As the proposed project comprises a number of discreet elements, it is necessary to examine them separately in terms of the normal development management and policy criteria. In this regard, this section deals with:

- The new children's hospital building
- The family accommodation unit
- The children's research and innovation centre

The assessment of Davitt Road and the children's hospital satellite centres are addressed in Sections 15.5, 15.6 and 15.7 respectively.

### 15.4.1 Compliance with Planning Policy

The strategic planning policy context for the entire project has been set out in Section 12 of this report. It is considered that, in the context of St. James's Hospital, the policy framework clearly demonstrates support for the development of a facility of this scale and nature in an inner city location proximate to high quality public transport infrastructure.

St. James's Hospital campus is located in the administrative area of Dublin City Council and therefore, the Dublin City Development Plan, 2011-2017, which came into effect on 22<sup>nd</sup> December 2010, is the relevant statutory plan<sup>95</sup>. The Development Plan provides the local statutory planning policy for the City and is the principal document for guiding the development of the subject lands.

Both the National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area support the consolidation of the metropolitan area and the more efficient use of urban land proximate to public transport routes. While Section 37G of the Planning and Development Act, 2000 (as amended) does not directly refer to the National Spatial Strategy or the Regional Planning Guidelines for the Greater Dublin Area this framework directly informs the Dublin City Development Plan and it is from these strategic plans that the specific development policies set out in the Plan are formed. Indeed, the opening section of the Dublin City Development Plan 2011-2017 states that:

*"Taking account of the development framework set out in higher level regional and national plans, the proposed strategy for Dublin promotes the consolidation of the city, maximising efficient use of land and integrating land-use and transport, all within the context of an over-arching philosophy of sustainability and quality of life factors."*<sup>96</sup>

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<sup>95</sup> That has been further varied by resolution.

<sup>96</sup> Dublin City Development Plan 2011-2017, Section 1.1

The proposed development of the new children's hospital and ancillary uses such as the Children's Research and Innovation Centre and the Family Accommodation Unit would meet the overarching aims of the Development Plan in this regard. The Development Plan is very clear in terms of its overall strategy and states that:

*"All the policies and objectives of this Dublin City Development Plan flow from and are consistent with these higher level national and regional policies in that they promote intensification and consolidation of Dublin city, all of which lies within the metropolitan area. This will be achieved by way of in-fill and brownfield development; regeneration and renewal of the inner city; redevelopment of strategic regeneration areas; and the use of higher densities especially in public transport catchments. These measures support an effective public transport system and the emergence of a critical mass for the city to compete at an international level and fulfil its role as the national gateway and driver of the national economy."*<sup>97</sup> (Emphasis added)

The proposed redevelopment of the western end of the St. James's Hospital campus for the new children's hospital clearly adheres to the overarching strategy of the Development Plan.

Furthermore, it is a central to the core strategy to enhance the links between the existing and emerging clusters in the city, and to create synergies that extend along three "innovation corridors" into the wider region. St. James's Hospital campus is located within one of these corridors, which stretches westwards from Heuston, including the Digital Hub, St. James Hospital, Park West, Cherry Orchard, the Naas Road developing area and extending into the wider metropolitan area to incorporate new urban centres such as Adamstown. These three corridors form part of a proposed innovation network to lever growth across the city region, leveraging on and supporting government policy to foster innovation and a smart economy.<sup>98</sup>

As part of the strategic approach of the Development Plan it states that in responding to the challenges facing the economy of the City and its role as the national and regional economic engine, the following approach will be pursued:

*"Developing academic medical centres providing excellence in research, care and teaching in the medical and health sectors"*<sup>99</sup>.

#### 15.4.1.1 Zoning

The subject site is zoned Z15 in the Development Plan, the objective of which is "To protect and provide for institutional and community uses and to ensure that existing amenities are protected."

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<sup>97</sup> Dublin City Development Plan 2011-2017, Section 3.2.1

<sup>98</sup> Dublin City Development Plan 2011-2017, Section 3.3.2.1

<sup>99</sup> Dublin City Development Plan, 2011 – 2017, pg. 136.

There is an emphasis on the importance of Z15 lands as a resource for the City in providing educational, recreational, community and health facilities and in the maintenance and creation of sustainable, vibrant neighbourhoods. Under this zoning *“buildings for the health, safety and welfare of the public and Medical and related consultants”* are permitted in principle, with *“car park ancillary to main use”* open for consideration. *“Education”* and *“Residential Institution”* are also both permitted in principle. The proposed development is, therefore, in terms of all the constituent elements on the Campus, permitted in principle.

The Development Plan notes that it is important to avoid abrupt transitions in scale and use zones. In order to protect the amenities of residential properties the Development Plan advises that *‘in zones abutting residential areas or abutting residential development within predominately mixed-use zones, particular attention must be paid to the use, scale, density and design of development proposals and to landscaping and screening proposals...’*<sup>100</sup>. In this regard, the design has had regard to the adjoining land uses by breaking down the mass to a lower scale adjoining the surrounding residential areas and by focussing the higher elements towards the centre of the site for the new children’s hospital building. Screening is also successfully employed on the site boundaries with new boundary walls and landscaping proposed. The Family Accommodation Unit specifically provides for this transition in scale and the Children’s Research and Innovation Centre building has had regard to the adjoining properties at McDowell Avenue and is stepped back away from same.

#### 15.4.1.2 Policy Compliance

There are a range of policy objectives set out in the Development Plan that the proposed development complies with and it is our view that the strategic improvement of healthcare facilities on the St. James’s campus adheres to the overall policy framework. In this regard, we note that Policy RE19 of the Development Plan specifically and categorically supports both the intensification and future development of the Campus and the provision of a new children’s hospital:

*“RE19 (i) To encourage the regeneration of the city centre zoned area through the promotion and facilitation of innovation clusters and the intensification of existing clusters such as the Mater Hospital, James’ Hospital and the Digital Hub*

*(ii) To recognise the strategic role of the hospital complexes in the city including the Children’s Hospital of Ireland having regard to their national medical function, their role as a major employer in the city, as a generator of significant economic benefits for the economy of Dublin’s inner city, and a promoter of the knowledge economy through research and education links with third level colleges in the city.”*

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<sup>100</sup> Dublin City Development Plan, 2011 – 2017, pg. 192.

Furthermore, Policy RE19 above acknowledges in a clear and unambiguous manner the benefits that the new children's hospital will bring to the city and to the local area, as has been set out above in this report. The inclusion of the Children's Research and Innovation Centre building in the proposed development further exemplifies the manner in which the application complies with Development Plan policy in that it actively fosters links between third level education and the new children's hospital. We believe that it would run contrary to the above policy to refuse the proposed development on the grounds of the principle of development and that no other Development Plan in the region provides such clear support for the development of the new children's hospital.

There is further policy support for the proposed development in the Development Plan in the form of Policy NC 19 which states it is the policy of Dublin City Council:

*"To facilitate the development or expansion and improvement of hospitals, community based healthcare facilities, respite homes and day care centres for the elderly in residential areas."*

It is submitted that the proposed development complies with a range of policy objectives set out in the Development Plan including, inter alia, Policies RE17, RE20, SC13 as set out in Section 12 above.

In terms of development standards, the following table provides a brief summary of compliance with same:

**Table 8 Policy Compliance Schedule**

Measure	Standard	Compliance
Layout	Appendix 2.1 of the Plan requires that new buildings are legible, permeable and safe	The proposed development fully complies with this requirement and, moreover, providing a more legible and accessible campus is central to the architectural concept.
Plot Ratio	0.5-2.5	<p>The new children's hospital building, including the family accommodation unit (excluding the Children's Research and Innovation Centre), measures 92,031sq.m. (above ground) on a site of 48,350 sq.m., which results in a plot ratio of 1.90.</p> <p>If the basement areas were included the floorspace figure would rise to 122,472 sq.m. and give a plot ratio of 2.5. It should be noted, however, that as a measure of density, plot ratio is concerned with volume and is designed to control the bulk and mass of buildings, therefore, it relates primarily to those areas that are above ground level.</p>
Site Coverage	50%	Residual ground floor area is 20,305sq.m. which gives a site coverage of 42%
Open space	25% open space and/or provision of community facilities	<p>Ground floor open space area is 9,000sq.m. with accessible open space at all levels at 13,000sq.m., or 27%, with a total of 22,000sq.m. of open space at all levels. In addition, the Inspector noted in the Mater application that "the requirement for 25% of the site to be committed to open space is not, in my opinion, a relevant consideration in this particular instance as there is a proviso that it shall be set aside for open space and/or community facilities. The proposed use would, in my opinion, comprise a community facility". (Inspector's Report PL29N.PA00024).</p> <p>Notwithstanding this, the proposed development also contributes to the</p>



		public realm by improving the linear park to the south and access to the campus from same.
Car parking	To be determined on a case by case basis.	The level of parking provided in the proposed development has had specific regard to the requirements of the hospital and the patients, visitors and staff of same. It is deemed more than sufficient to serve the expected demand and is in excess of the levels currently provided in the three existing children's hospitals.  Please refer to the Transportation Section of the EIS
Cycle Parking	1 secure space per 5 hospital beds	400 no. cycle spaces are being provided in addition to staff changing facilities.
Energy Efficiency	Policy SI61 and Section 17.1.4	The sustainability report submitted with the application confirms compliance with these objectives.  It concludes; "The new children's hospital is being designed to achieve exemplar standards in relation to energy efficiency. Not only will the building comply with Part L of the Building Regulations but it will far exceed those requirements by delivering the necessary energy efficiency credits to achieve a BREEAM Excellent building and a Building Energy Rating (BER) of A3. The building will include highly efficient and renewable technologies and will have intelligent metering. The metering will allow for the monitoring of energy consumption in use, enabling a programme of targeted improvements through the life of the building. By delivering a highly energy efficient building the carbon dioxide emissions of the building will also be minimised reducing the impact of the building on the environment in the long term."
SUDS	Policy SI52 and objectives SIO73 and SIO76	Please refer to the engineering documentation submitted with the application that confirms compliance with these policies and objectives.
Waste Management	Objective SIO061	A construction and demolition waste management plan has been prepared and is attached to Chapter 10 of the EIS.

Note: floor areas provided by project architects on 24/07/15

#### 15.4.1.3 Height

Section 4.4.4 of the Development Plan deals with building heights in Dublin City and the design team has been cognisant of this policy framework throughout the design process. Specifically, the idea that the building should retain the feel and impression of a seven storey building is central to the design philosophy. The proposed new children's hospital building on the St. James's Hospital campus rises seven storeys above ground level with the plant space integrated into the roof structure. The form of the proposed parapet level effectively screens the roof structure at ground level and the building reads as a seven storey structure from the surrounding streets. The ventilation flues that extend beyond this are not built space and, in our view, cannot be classified as a "floor". It can be said, therefore, that the proposed building generally complies with the seven storey limit as imposed by the Development Plan.

With regard to the 28m set standard, it is notable that the Development Plan refers to an average floor to floor height of 4.0m. The Development Plan is unclear as to how it was decided that this was appropriate for hospital type developments. Indeed, it was originally apparent that this measure related only to “office” developments (being varied in 2013 to “commercial”, in the definition of which hospitals were included). It is incongruous, in our view, to limit the required floor to floor heights for critical hospital infrastructure to a requirement intended for office and commercial type developments. It is clear from the proposed development that a floor to floor height in excess of this is required to adequately service a modern hospital. In this regard, it is our view that the application of the 28m height limit is inappropriate in this instance, having regard to the type of development proposed.

The floor to floor heights of the proposed new children’s hospital building are derived from the requirements of the operation of the Hospital. Hospitals, by their very nature, are very heavily serviced buildings and there has been a general trend in modern hospital design to exceed the floor to floor heights of 4m. The project architects, BDP, have been involved in schemes such as Alder Hey children’s Hospital and Brighton Children’s Hospital where the floor to floor heights exceed this figure.

In the proposed children’s hospital building, the storey heights are as follows:

- 4.2m for the podium levels, where departments like Imaging or Operating Theatres require greater height for the effective operation of large-scale medical equipment and there is also greater demand for engineering services within the ceiling space;
- 3.8m for the wards, where room heights can be lower and there is less demand for engineering services
- 5.15m for the interstitial floor, which requires greater height for the main engineering plant room serving the podium’s diagnostic and treatment areas below.

Clearly, there appears to be a conflict between the average floor heights set out in the Development Plan and the requirements of a modern hospital. As set out above, the proposed development complies with a significant number of equally important Development Plan policies, including policies that are concerned with the well-being of the city as a whole. In this regard, the acceptability of the building must be examined in terms of its impacts on the surrounding environment and, whether after a careful consideration of any impacts, these impacts are significant enough to warrant a refusal of permission. The EIS submitted with the application carefully examines the impacts in terms of daylight, overshadowing and visual impacts and it comes to the conclusion that these impacts are acceptable. This report, in Section 15.4.2 below, looks at these impacts in planning terms, having regard to them in combination with other considerations, such as the benefits of the proposed development reducing the building height, or modifying the design would result in the elongation of the building and may have a negative amenity impact. We would submit to the Board that the acceptability of the proposed building height should be set against these considerations.

It is respectfully submitted, however, that the Board is empowered to consider Strategic Infrastructure Development in manner that is consistent with its status as a development that would be of strategic importance to the state and the region, providing national tertiary paediatric care and secondary paediatric care for the Greater Dublin Area (as set out in the Inspector's Report, PL29NPC.0158). In this regard, Section 37G(6) of the Planning and Development Act, 2000 (as amended) states:

*"The Board may decide to grant a permission for development, or any part of a development, under this section even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development."*

#### 15.4.1.4 Development Management Considerations

There are a number of more local development management considerations to be assessed in an application of this nature. It is important, however, to set these against the Strategic Infrastructure Development status of the proposed development and its importance to the future development of the City and the State.

The following development management issues are considered hereunder in terms of the elements of the project located on the St. James's Hospital campus:

- Visual Impacts
- Amenity Impacts (overlooking, overshadowing, sunlight / daylight, scale and massing, noise, air quality)
- Construction Impacts on Adjoining Structures
- Existing Hospital Operations
- Traffic and Transportation
- Helipad

#### 15.4.1.5 Visual Impacts (local and city wide)

The visual impact of the proposed development was a key consideration in the design process, informing the selection of the preferred design option. This was a direct result of the decision on the Mater application, where the visual impact of the development on the local neighbourhood and wider cityscape was a significant factor in its refusal. In this regard, the design of the scheme has sought to reduce the impact on the cityscape and the surrounding neighbourhoods. A full Landscape and Visual Impact Assessment has been carried out by Brady Shipman Martin and is attached to this application as Chapter 14 to the EIS.

The design strategy meant that, from the outset, the views of the proposed development were considered in detail (see Chapter 4 of the EIS) and that the preferred design options were chosen where they had the least impact on the surrounding environment.

Given the scale of the building proposed, the massing of the building is such that it does not have a significantly negative impact from distant views and in many cases, does not break the skyline (including when viewed from tourist attractions such as the Guinness storehouse). The impact of this building, when set against the impact of other landmark buildings that have recently been constructed such as the Aviva stadium, can be said to be moderate despite its scale. The impacts will be mostly felt locally but the grading down of the mass of the building towards the public edges of the site and the curved nature of the ward block, successfully mitigates the perceived visual impacts.

The Landscape and Visual Impact Assessment submitted as Chapter 14 of the EIS sets out the views of the previously permitted Private Hospital development in each of the selected views. It is clear from this comparison that the proposed development is more successful in reducing the overall impact on the surrounding areas, particularly the near views (from the adjoining streets). This assessment is useful in highlighting the work the design team has undertaken to ensure that visual impacts are mitigated.

This is a landmark building and one that will have an impact on the locality. This impact can, however, be viewed positively given the high quality of the design and having regard to the previously permitted Private Hospital development, can be said to be an improvement on other development options on the lands.

#### 15.4.1.6 Amenity Impacts

The impacts of the proposed buildings on the St. James's Hospital campus and the amenities of the surrounding environment are important planning considerations. Any new building that results in a change to the built environment will give rise to certain impacts. It is the magnitude of these impacts and the amenities that are impacted upon that must be balanced against the benefits of any development. In this instance, the fact that the proposed development is of critical national importance, as evidenced by its Strategic Infrastructure Development status and Government support, should provide a context in which these impacts are assessed. It is worth noting that the impacts of a large building at this location, particularly at the southern end of the new children's hospital building site, have previously been examined by the Board and have been considered to have been acceptable in light of the then proposal for a new Private Hospital development (An Bord Pleanála Reg. Ref. No. PL29S.236070 refers).

The various aspects of potential local amenity impacts are examined in turn hereunder.

## Overlooking

The provision of a building that is generally of a higher scale than the surrounding properties should have regard to the amenities of the existing properties in its design. The Development Plan requires that all buildings of scale have regard to design criteria that include minimising *“overshadowing and overlooking of surrounding properties and adverse impacts on established or emerging residential communities.”*<sup>101</sup> It is submitted that the proposed development at the St. James’s site has had due regard to the privacy of the surrounding residential properties through the maintenance of separation distances that are generous enough to protect the amenities of the residents and, in addition to this, the use of privacy screens to external terraces and open spaces to mitigate the perceived impacts on privacy of the placing of a building in this location.

Furthermore, the breaking down of the scale of the building assists in creating a more appropriate form proximate to the neighbouring properties. The design of the buildings on the St. James’s site have considered the amenities of the local residents at every stage in the process and, where concerns were raised at public consultation events, mitigation was employed to ameliorate any perceived issues (such as the addition of the privacy screens). It is considered that this design has carefully and successfully balanced the amenities of the existing residents with the needs and requirements of the patients and staff of this critical national facility.

It is noted that the Development Plan does not contain prescriptive standards for separation distances where institutional development is concerned, rather it refers to a separation distance of 22m for directly opposing first floor windows in residential developments.<sup>102</sup> In the case of the proposed development, these distances are greatly exceeded at all edges and, where the building is higher than a traditional residential first floor, the separation distances increase. In order to forensically examine the issue of overlooking, we must examine the potential sources of overlooking and the vulnerable receptors.

### Potential Sources:

- South western “fingers” adjacent to South Circular Road
- North western “fingers” adjacent to Cameron Square
- Family Accommodation Unit adjacent to Cameron Square
- Clinical block, north eastern corner adjacent to O’Reilly Avenue
- Ward block
- Access Road
- Children’s Research and Innovation building.

### Receptors:

- Mountshannon Road / South Circular Road
- Brookfield Road / Cameron Square
- O’Reilly / Donnellan Avenues
- St. James’s Walk (not shown, due south of Rialto Luas station)
- McDowell Avenue (Children’s Research and Innovation Centre building)

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<sup>101</sup> Section 17.6.3 – Social Criteria

<sup>102</sup> Section 17.9.1

## Mountshannon Road / South Circular Road

The properties on Mountshannon Road and South Circular Road are largely arranged obliquely or perpendicular to the proposed development, save for nos. 499 and 497 South Circular Road, which face the proposed development. It is submitted that the proposed development is, at this location, sufficiently distant from the existing residential properties to avoid any overlooking issues. For example, the southernmost finger is in excess of 27m from the side of the dwellings on Mountshannon Road that are directly opposing it. The northernmost finger of the cluster south of the entrance plaza is in excess of 25m away from the end unit on South Circular Road. Both of these sets of adjoining dwellings are side-on to the proposed development and it is submitted that overlooking will not occur in this instance. In the case of nos. 499 and 497 South Circular Road, the proposed development directly faces their front elevations, across an extremely busy road, and as such, it will not impact on their amenities. The residential property at no. 501 South Circular Road does not directly oppose the proposed development, the windows on the rear elevation face away from the site (although some windows on the return do face the development). Further to consultation with the local residents and it was considered appropriate to screen the terraces at this location with opaque glass in order to ameliorate any perceptions in overlooking. The ends of the south western fingers at this location are arranged so that the spaces within are not considered to give rise to overlooking issues.

With regard to the impact of the ward block on this area, it is submitted that the separation distance is sufficient to prevent overlooking. Notwithstanding this, the angle of observation from the ward block is such that views are directed over the interstitial floor and away from those properties closest to the proposed development, particularly at the lowest ward level.

It is considered that the assessment of the Inspector with respect to the permitted Private Hospital development at this location is relevant when considering the current proposal. In this assessment, the Inspector concluded:

*"In relation to impacts on privacy, I consider that having regard to the nature of uses at lower levels and the separation from upper floor elements, overlooking of properties to the west will not arise to a significant extent such as to erode residential amenity".<sup>103</sup>*

It is submitted that the proposed design is, in fact, an improvement on the Private Hospital proposal and is not injurious to residential amenities at this location, particularly in the context of the critical nature of the proposed land use.

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<sup>103</sup> Inspector's Report, PL29S.236070, page 30



### **Brookfield Road / Cameron Square**

The issue of overlooking at Brookfield Road / Cameron Square was also considered in great detail in the design process. The placement and design of the family accommodation unit is considered to provide an adequate level of screening from the main hospital building to such a degree that overlooking could be considered not to occur from it at this location. The properties on the eastern side of Cameron Square do not directly oppose the proposed development and the north western fingers of the main hospital building are designed so that there are no windows facing into the gardens of these properties. The terraces at this location are also screened with opaque glass to further prevent overlooking. Additional landscape screening and the new boundary wall at this location will further protect these properties from overlooking both from the hospital building itself and the hospital access road.

With regard to the proposed Family Accommodation Unit and the properties on the southern side of Cameron Square and Brookfield road, it is notable that the proposed building is oriented so that no windows directly oppose the rear elevations of the existing buildings. Furthermore, the windows to the bedrooms of the family accommodation unit are sufficiently distant to protect the privacy of these existing dwellings, with no built space within 22m of the rear walls of these properties and the rear windows of the family accommodation unit in excess of this distance.

### **O'Reilly Avenue / Donnellan Avenue**

The proposed building is located in between 30.9m and 45.4m from the rear of the dwellings on southern end of O'Reilly Avenue. The top floor of the building at this location is predominately an interstitial plant level. The landscaping strip at this location has been specifically designed with the privacy of the existing residents in mind. The provision of a green barrier will enhance the amenities of the residents from the current situation (direct views into the St. James's Hospital car park). The selection of the tree species at this location has had due regard to the consultation process whereby residents expressed concern over the potential height of any trees and their distance from the rear of the properties. In this regard, the taller species were replaced by lower species and moved away from the rear gardens of the properties. Lower shrub type planting and a strip of lawn will directly abut a new boundary wall at this location. This provides the required privacy while not removing the feeling of openness currently enjoyed by the residents at this location.

Again, with respect to the ward block, given the extent of the garden level, views from the ward block are directed over and away from the dwellings closest to the proposed building.

### **St. James's Walk**

The properties directly to the south of the proposed development, across the Luas line and St. James's Walk cannot be said to be negatively impacted upon in terms of overlooking given the separation distances from the properties. Indeed, this view was held by the Inspector on the Private Hospital development proposal on this site, who concluded:

*“Residential properties to the south of the site, which front onto James’s Walk, are located approx. 55m south of the development, with private open space for those properties located to the rear / south thereof. Having regard to such separation, I do not consider that the development will give rise to undue impacts in terms of over-looking or loss of privacy.”<sup>104</sup>*

We submit that the proposed development will not give rise to additional impacts in this location beyond those that were identified in the above application in terms of overlooking.

### **McDowell Avenue**

The properties on McDowell Avenue, directly adjacent to the Children’s Research and Innovation Centre building will not be overlooked by any element of the proposal and, as such, it is submitted that the issue of privacy does not arise in this instance.

### **Overshadowing / Loss of light**

The impact of the proposed buildings on the St. James’s Hospital campus on adjoining properties in terms of overshadowing and daylight has been examined in detail in Chapter 13 of the accompanying EIS. This section specifically examines the impacts on the amenities of the adjoining properties with regard to established guidance.

This section of the EIS concludes that, for daylight, the loss of daylight would be post construction, for the specific properties tested on O’Reilly Avenue, Glenmalure Court, South Circular Road, Cameron Square, Faulkner’s Terrace, St. John’s Terrace and McDowell Avenue, the loss of daylight would be within BRE guidelines. Loss of daylight for other dwellings in these areas is also expected to be within guidelines. The loss of light is considered to be slight/not significant in EIS terms.

The only area where the loss of daylight exceeds BRE guidelines is on Brookfield Road, where reference points Nos. 53 and 49 will experience a slight/moderate adverse impact. However, at the northern end of the terrace No. 39 will be within BRE guidelines and the loss of light will be not significant. The assessment indicates that for the terrace comprising Nos. 39 to 53A inclusive, the southernmost properties, will experience a slight/moderate impact, whilst no significant impact is experienced towards the northern end of the terrace. This pattern reflects the location of the proposed Family Accommodation Unit.

For sunlight, the assessment finds that post construction, for the specific properties tested on O’Reilly Avenue, Glenmalure Court, Brookfield Road, South Circular Road, Cameron Square, Faulkner’s Terrace, St. John’s Terrace and McDowell Avenue, the loss of sunlight would be within BRE guidelines or not applicable. Loss of sunlight for other dwellings in these areas is also expected to be within the guidelines. Loss of sunlight will generally be slight on an annual basis, rising in some instances to moderate for winter months.

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<sup>104</sup> Inspector’s Report, PL29S.236070, page 30

In a general sense, the amenity impacts relating to daylight and overshadowing are considered to be acceptable on balance, having regard to the wider benefits of the proposed development at the St. James's Hospital campus. The impacts are considered transient in nature in terms of overshadowing, in that the adjoining properties are only affected during certain times of the day and the impacts do not result in a negative impact. In terms of daylight, the windows that are affected on Brookfield Road are predominately north facing in any event, and these properties have access to south facing private open space to the rear and a south/southwest facing elevation.

### Scale and Massing

Whilst the proposed main hospital building is of a significant mass compared to the surrounding buildings, the St. James's Hospital site itself is characterised by larger buildings and the site relates to the more industrial and institutional character of the lands to the east (i.e. Guinness). The nature of the proposed development, being a national children's hospital of critical importance and a landmark building to serve the city and the island for the foreseeable future, means that it will alter the perception of its setting, although this can be viewed in a positive light.

A significant emphasis has been placed on the design of the proposed main hospital building and it is central to the architectural concept to break down the mass of the building where it is proximate to the surrounding external environment. The elevation to South Circular / Brookfield Road has been broken down through the use of the finger elements and the maintenance of a three storey scale at this location. As can be seen from the Landscape and Visual Impact Assessment in Chapter 14 of the EIS, the views to the site from the west and the approach from the south along South Circular Road benefit from this strategy.

In terms of the overall mass of the building, the priority was to ensure that the highest points in the building were as distant as possible from the surrounding neighbourhoods and, consequently, the ward block is centrally located in the site. The interstitial floor and podium garden level serve to break up and further soften the mass by allowing glimpses of the gardens and planted areas. It is submitted that the design response is successful in creating a built mass that is perceived differently from different locations and one that sits in well with its surrounding environment.

It is also worth considering again the previous decision on the Private Hospital on this site, where a large building was considered acceptable in its surrounding context. We would submit that the proposed design is an improvement on the previous proposal insofar as the elevation presented to South Circular Road at the western side of the development has been treated more successfully and that views from areas such as Mountshannon Road have been improved. This is evident from the photomontages submitted with this application.

The use of three and four storey elements to the edges of the site and the provision of the higher ward block that "floats" on the podium garden level are devices that not only add interest to the design but also serve to break down the mass of the building and make it less imposing when viewed from the adjoining streets and roads.

The Family Accommodation Unit provides a further buffer in terms of the transition in scale from a more residential area to a hospital campus, rising from the two storey houses on Brookfield Road, to the three storeys of the Brookfield Clinic and rising to four storeys to announce the entrance to the new children's hospital site. It screens certain views from the adjoining properties and adds a variation to the design to provide relief.

The Children's Research and Innovation Centre building has been designed to step back and away from the adjoining properties at McDowell Avenue. The built form when viewed from these properties is offered further relief through the architectural expression of the elevation, as can be seen on the drawings for this building.

Overall, the transition in scale offered by the proposed development is not unusual in the context of Dublin City, where older buildings are often juxtaposed against larger, newer structures. In the context of significant public buildings, building of scale are not unexpected and contribute to the overall experience of the city. Notwithstanding this, it is submitted that the proposed development successfully addressed the issue of scale and the transition from the residential areas to the west to the instructional and industrial lands on the campus and to the east.

### Noise impacts

A Noise and Vibration impact assessment has been carried out with respect to the proposed development and is set out in Chapter 11 of the EIS. This sets out that the proposed development will not give rise to unacceptable amenity impacts, albeit that there will be some impacts during construction relating to piling etc. at specific times, provided the proposed mitigation measures are employed.

### Air quality

An air quality impact assessment has been carried out with respect to the proposed development and is set out in Chapter 12 of the EIS. This sets out that the proposed development will not give rise to unacceptable amenity impacts, subject to the adherence to the mitigation measures proposed.

#### 15.4.1.7 Construction impacts on adjoining structures

A number of adjoining residents have outlined concerns in relation to the potential for construction activities to undermine the structures of their properties. The EIS examines the impacts of construction activities in terms of vibration on adjoining properties in Chapter 11 and this concludes that it is not expected that there will be a negative impact on these structures. The design fully takes into account the existing condition of the properties to ensure that any 'at risk' or sensitive properties re fully protected have been considered. Limits for vibration are set out in the EIS in order to ensure there will not be any adverse impact on the existing structures.

Notwithstanding this, and in advance of the lodgement of the application, the applicant has commissioned an independent structural condition survey by qualified Chartered Surveyors of the properties directly adjoining the campus. The survey work will include a visual survey of the house and gardens/boundary walls within the property line. The survey company will record, within a Condition Report using photographs and sketches, the current structural condition of the house and the boundary structures within the property line. This Condition Report will be issued to the residents of each home for their review well in advance of the commencement of any construction works. The residents, at their discretion, may employ a suitably qualified Technical Advisor to review the report on their behalf. The NPHDB will fund the cost of this Technical Advisor. The NPHDB will fully consult with the residents (and or their Technical Advisors) on the proposals for the construction of the basement and agree mitigation measures to be used to prevent damage to their properties.

Prior to Construction works commencing, the Contractor and NPHDB Representatives, together with the residents and/or their Technical Advisors O'Connor Sutton Cronin will carry out a further inspection of the properties to record if there has been any change since the original survey was undertaken. If so, this will be recorded and the report will be reissued to residents.

The applicant is making itself available to meet with the residents to discuss any concerns they may have, to present layout plans and sections to them and to discuss the methodologies that will be used for the construction of the proposed hospital.

All of the above has been specifically considered in order to reassure residents that the hospital construction will not impact on existing buildings.

In addition to the above, an outline Construction Management Plan has been prepared by the project team and this is attached to this application. This methodology demonstrates that there is a commitment to protecting the integrity of adjoining properties and that their amenities have been considered at this early stage.

#### 15.4.1.8 Existing hospital operations

Ensuring that the existing St. James's Hospital campus can operate efficiently and with the least amount of disruption was a key consideration in the design process. Access to and from the site for public transport and emergency services and the health and welfare of the patients and staff of St. James's Hospital will be protected at all times during the construction process. The measures employed to do so are set out in the outline Construction Management Plan, and Chapters 11 and 12 of the EIS ("Noise and Vibration" and "Air Quality and Climate"). The key aspects of protecting the existing operations are:

- The maintenance of emergency vehicle access through the campus at all times through the provision of a temporary through road in the initial phase of development.
- The prevention of infection through dust minimisation measures and *Aspergillus* i.e. legionnaires disease, protection measures.
- The setting of vibration limitations to protect sensitive equipment and persons.
- The setting of noise limits and limits on the hours of operations to protect the amenities of patients and staff.

In terms of the hospital functions that are being carried out in the buildings that are proposed to be demolished, St. James's Hospital has in place a programme for the relocation of these functions (which will happen notwithstanding the development of the new children's hospital). The proposed construction will not, as a result, impact on these hospital operations.

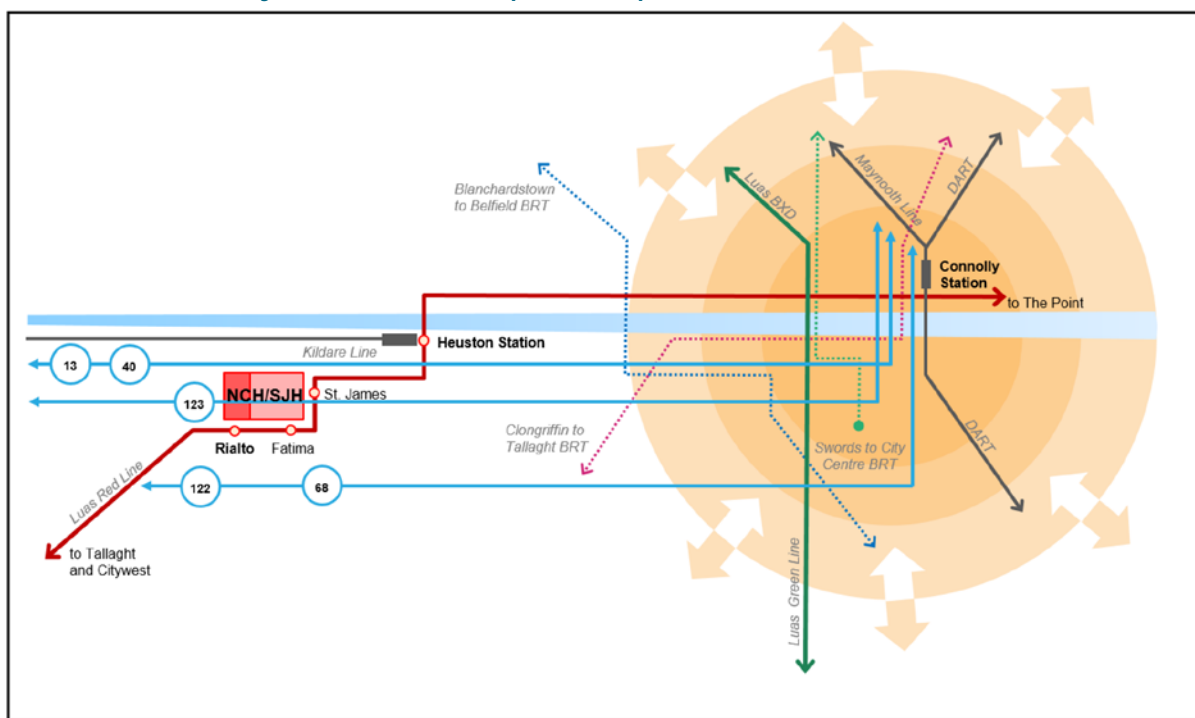
It is submitted that the consideration of the existing hospital functions by the design team has been adequately demonstrated in this application and that, by granting consent for the application as lodged, St. James's Hospital is satisfied that its operations, staff and patients are protected.

#### 15.4.2 Traffic and Transportation

The impacts of traffic or the perceived impacts of traffic is a matter that warrants specific consideration in the assessment of this application, particularly in relation to the St. James's Hospital campus. Arup consulting engineers have carried out a full traffic impact assessment (as set out in Chapter 6 of the EIS) and have directly engaged with St. James's Hospital on the implementation of Mobility Management measures on a campus wide basis well in advance of the lodgement of the application.

Strategically, the site is one of the most accessible hospitals in the State, with a high quality public transport connection running through the campus that directly links it with the national rail and bus networks. The development of such lands for critical public infrastructure is in line with national, regional and local planning policy and makes best use of public money in relation to encouraging public transport use.

#### Plate 20 Accessibility of St. James's Hospital Campus



It is worth noting the conclusions of the Inspector in relation to the development of the Private Hospital on the site, who stated:



*"The designation of St. James's as a site for a co-located hospital and the intention to invest in, and concentrate facilities in this national healthcare centre will result in additional trips to and from the facility. Having regard to its central location and accessibility by public transport, the hospital is regarded as an appropriate location for intensification of activity."*<sup>105</sup>

In terms of the local road network and onward connections to the Regional and National road network, the baseline assessment in the EIS identified that, as with most other city centre locations, the local road network can experience congestion during both the morning and evening peak commuter traffic periods. Outside of these periods, the local road network functions quite well and generally has capacity. Access to the site is similar to other City Centre sites in terms of private car travel but greatly increased over and above any other site in terms of public transport.

The level of additional traffic generated during the evening commuter peak periods is also limited through the reduction in staff parking. The EIS indicates that relative traffic increases on the local road network remain below 5% with the exception of the Mount Brown / James's Street / Thomas Street route. As with the morning peak assessment, this additional traffic does not create any significant additional impact on junction performance or traffic movement. While traffic leaving the Hospital Campus during the evening peak period will experience delay on the local road network, the level of additional impact externally is limited. Proposed upgrades to the existing Campus junctions off James's Street and Rialto, together with the removal of non-hospital through traffic, will ensure that better traffic management in the evening peak, and will have added benefits in terms of reducing delays currently experienced by bus services running through the Campus.

The proposed development at St. James's Hospital has been particularly sensitive to ensure that transport impacts during construction of the new hospital are minimised for both the existing operation of the St James's Hospital and the local community.

Construction traffic will be managed at all times. In terms of construction staff, the Contractor will not have any car parking provision on site and, as is the case with all city centre construction sites, will be required to take responsibility for and manage the travel requirements of his staff. The proposed additional parking management measures in the neighbouring roads and street will ensure that construction related parking impacts external to the site will be controlled. In addition, as part of the construction management programme the contractor will be required to liaise with local community groups.

The biggest impact during construction will be as a result of the export of material from site during basement excavations, over an approximate 18 month period, and the importation of materials for the construction process. These are detailed in the outline Construction Management Plan.

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<sup>105</sup> Inspector's Report PL29S.236070

Following the construction of the new children's hospital, it is acknowledged by the transportation consultants that the surrounding street network will continue to experience traffic queuing and delays at some periods through a typical week day. The mitigation proposals included as part of the Transport Strategy for the St James's Hospital campus and the new children's hospital ensures that the increase in traffic levels and associated impact during these periods are kept to a minimum.

It is submitted that, in the context of the overarching and strategic level planning policy support, the need for the new children's hospital and previous decisions on the St. James's Hospital campus the conclusions reached in the EIS relating to traffic and transportation warrant a grant of permission in this instance.

### 15.4.3 Cultural and Built Heritage

The proposed development of the new children's hospital building on the St. James's Hospital campus will result in the demolition of all buildings on the site of same at the western end of the campus. It will also involve the demolition of the remnants of a building at the eastern end of the campus where the Children's Research and Innovation Centre building is proposed. The impact on architectural heritage is set out in Chapter 16 of the EIS and the planning assessment of same is set out below. While there are no protected structures on the site of the new children's hospital building on the St. James's Hospital campus, there are a number of structures that are older and warrant a more detailed consideration and recording. The EIS and planning documentation sets out a detailed photographic and digital survey of a number of these buildings, with specific reference to the existing Chapel on site and Garden Hill House, to the northern end of the main building site.

Given the site's central location in Dublin city, there is always the potential for archaeology. In this regard, a full programme of test trenching has been carried out in identified key areas in advance of planning, as part of the EIS baseline study, and further monitoring is proposed post-planning during the early stages of construction. The detail of the findings of the archaeological study and further monitoring is detailed in Chapter 15 of the EIS and are summarised below.

#### 15.4.3.1 Existing Chapel Building

The demolition of the existing chapel on site warrants specific consideration in this report, despite the fact that it is not a protected structure. This building was previously proposed to be demolished to allow for the construction of the private hospital development on the site and, further to the issuing of this permission, St. James's Hospital applied for, obtained consent, constructed and commissioned a new multi-faith facility on the campus to cater for all current and future religious functions (Dublin City Council Reg. Ref. no. 2750/09 refers). This reflects the changing nature of the campus and the demographics of the patients and visitors to same.

The previous decision by An Bord Pleanála to permit the demolition of the existing chapel building on site is one that was made in light of the critical importance of the hospital development. In that case, the Inspector concluded:

*"The designation of St. James's as a site for a co-located hospital and the intention to invest and concentrate facilities in this national healthcare centre will, particularly in the context of this central urban site, require the rationalisation of the overall complex. These requirements are outlined in the OCDP. I note the alternative development options identified and the benefits arising from the preferred option, in terms of proximity and linkages between public and private hospitals. The appeal site is otherwise appropriate for development and retention of the chapel would comprise a significant constraint on same.*

*I conclude that the proposed development, being in accordance with government policy for the health service and with the overall Masterplan for the development of St. James's hospital campus, is of strategic importance. The local value of the chapel is acknowledged, however, based on the information available and in the context of the proposed development I consider that on balance its removal may be regarded as acceptable."*<sup>106</sup>

Furthermore, the Board itself concluded:

*"...it is considered that the advantages of locating a high quality hospital development within the established hospital complex in terms of efficient use of infrastructure and general sustainability, justifies the proposed demolition of the late nineteenth century chapel, which is not a protected structure."*<sup>107</sup>

Clearly, the balance of the protection of the existing building and the provision of critical health infrastructure was one that was considered in great detail previously. In that instance, the view was taken that it was appropriate to demolish the existing chapel, subject to detailed recording.

In this particular instance, the retention of the structure in situ was considered non-viable in the context of an efficiently operating hospital. A range of studies were commissioned by St. James's Hospital in advance of the appointment of the design team for the new children's hospital and all of the proposed designs required the removal of the chapel in order to facilitate this critically important piece of health infrastructure. The requirements for modern hospital floorspace and the efficient operation of the facility means that working around the existing chapel building would be unrealistic, having regard to the brief and the external development constraints (Development Plan policy and adjoining properties).

It could be argued that, in the intervening period from the granting of permission for the Private Hospital block and this application for permission for the new children's hospital building, the Development Plan policy context has not changed vis-à-vis the protected status of the building, despite there being a review of the Development Plan in the interim. Moreover, the importance of the building that it is proposed to replace it with has been elevated to a publically funded national tertiary paediatric hospital that will benefit the entire island of Ireland. In this context, it is difficult to conclude that the protection of the building and the refusal of permission on such grounds would be warranted in this instance, notwithstanding Policy FC27 of the Development Plan, having regard to the rationale set out by the Board in the decision on the private hospital.

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<sup>106</sup> Inspector's Report PL29S.236070, pages 32 and 33

<sup>107</sup> An Bord Pleanála Board Order PL29S.236070

We would submit to the Board that the demolition of the existing Chapel on site and its replacement with the new children's hospital building is in keeping with the proper planning and sustainable development of the area and, indeed, the State.

#### 15.4.3.2 Archaeology

The question as to the archaeological potential of the subject lands and the St. James's Hospital campus as a whole was raised at pre-application stage by Dublin City Council. It is noted that some of the subject lands on the St. James's Hospital campus fall within the Zone of Archaeological Potential as set out in the Development Plan. As a result of consultations between the City Archaeologist and the appointed EIS specialists, Courtney Deery, a series of test trenches were excavated and examined as part of the EIS baseline assessment. Test excavation and monitoring of geotechnical investigations took place in order to establish if the foundations of the former building could be revealed and also if previously unrecorded burials could be detected.

Chapter 15 of the EIS sets out the findings of this assessment and proposes further monitoring during the construction programme. This has been built into the outline Construction Management Plan (as attached to this application) and it is proposed that this will ensure that any and all finds of archaeological importance are recorded in an appropriate fashion.

We respectfully submit that the matter of archaeology can be dealt with by way of an appropriate condition that requires monitoring during construction and the applicant has already demonstrated its bona fides in this regard.

#### 15.4.4 Community Gain and Urban Regeneration

With respect to community gain and the urban regeneration opportunities, these have been set out in the preceding section of this report. The applicant is committed to capturing the potential benefits that may accrue to the local community as a result of the proposed development, not only through improvements to the public realm by the upgrading of the linear park to the south, the new public plaza at the entrance to the new children's hospital and the new garden adjacent to the northern entrance of same, but also through active engagement with the local community.

The proposals for this engagement have been set out in the NPHDB document entitled *"Harnessing the Potential – Maximising the Community Benefit arising from the New Children's Hospital"* that is attached to this application. It is notable that the Strategic Infrastructure Development legislation specifically provides for community gain and the Board may, if it so wishes, attach a condition to any permission under this section of the Act.

In this regard Section 37G(7)(d), relating to Strategic Infrastructure Development, states:

*"Without prejudice to the generality of the Board's powers to attach conditions under subsection (3) the Board may attach to a permission for development under this section—:*

(d) a condition requiring—

*(i) the construction or the financing, in whole or in part, of the construction of a facility, or*

*(ii) the provision or the financing, in whole or in part, of the provision of a service, in the area in which the proposed development would be situated, being a facility or service that, in the opinion of the Board, would constitute a substantial gain to the community."*

Having regard to the above, the applicant is willing to accept a condition attached to the permission that requires the following:

- The establishment of a Community Benefit Oversight Group (CBOG) and the appointment of a Community Engagement Manager for the period of construction. Details of the structure, functioning and membership of the group, including representation from the applicant, the local community and the Planning Authority will be agreed with the Planning Authority.
- That the GBOG shall systematically assess the impacts on the environment, during construction, within an area up to one kilometre from the campus and shall send a report in writing to the contractor in June and December each year, which shall identify any problems arising and put forward mitigation measures.
- That the applicant and contractor shall make annual payments to be agreed with the CBOG (updated at the time of payment in accordance with changes in the Wholesale Price Index – Building and Construction) to a funding programme, which may be used to meet the costs of the general activities of the CBOG, including in respect of works of environmental maintenance and improvement in the area and for social and educational activities benefiting the local community.
- That the provision for social clause targets be made in any contract for development of the new children's hospital at St. James's Hospital.

This demonstrates the commitment of the applicant to the integration of the proposed development into the local community through real local gains during the construction process.

#### **15.4.5 The Helipad at St. James's Hospital Campus**

The location of the helipad was the subject to a number of studies during the design process both from an operational and amenity impact point of view. The inclusion of a helipad in the first instance is considered critically important to the functioning of the hospital at St. James's Hospital and, in this regard, it is worth noting the conclusion of the Inspector in the Mater case, where they stated:

*"Whatever option is proposed, I would consider that a helipad is a critical element of a national tertiary proposal and I would recommend in that regard that if the Board are minded to permit the proposed development that a condition is attached to any permission requiring that a helipad is operational within the campus prior to the opening of the subject proposal."*<sup>108</sup>

As a result, it was integral to the brief that a helipad was included in the application. The location of the helipad in an urban area warranted specific consideration and the project team considered a number of locations as follows:

- A helipad at ground level in the northern portion of the site (to the north of the new children's hospital building)
- A location on the roof of the ward block.
- Any of three locations on the southern end of the main block.

**Plate 21: Possible Helipad Locations**



In terms of the assessment of these locations the amenities of the adjoining residents was a key consideration. The ground level option resulted in a flight path that was extremely low over the properties at O'Reilly Avenue and Cameron Square and was likely to give rise to issues relation to downdraft in the private open spaces attached to these dwellings. The location on the top of the ward block would have resulted in similar issues with the oval shaped rooftop garden. From a design perspective it would also result in a visually obtrusive structure that would disrupt the architectural flow of the building.

The preferred option was at the southern end of the site where the flight path was high enough not to interfere with the adjoining properties but also provide options in terms of an alternative flight path (along the LUAS line, for example).

<sup>108</sup> Inspector's Report, PL29N.PA0024; page 104



The noise levels generated by the helicopters have been examined in some detail in Chapter 11 of the EIS. The predicted daytime noise levels are of a similar order of magnitude to the existing baseline noise levels in the vicinity. Helicopter noise will therefore have a similar overall magnitude of impact to other everyday transportation sources (e.g. Luas & road traffic).

During the night-time the overall noise impact will be greater due to the shorter assessment period, however, it must be noted that the actual duration of the helicopter movement will be of the order of 1 minute for landing and 17 seconds for take-off. The very short duration of the event and the infrequency in the context of a weeklong period does mitigate against the impact.

It is noted that helicopter noise emissions have a unique signature (i.e. are easily recognisable) and the helicopter movements would dominate the noise environment during short periods within which they occur. It would, therefore, be expected that helicopter activities would draw attention of residents and occupiers of noise sensitive locations more readily than the existing noise sources in the area. However, given the emergency nature of the helicopter movements, the limited number of trips that are expected, it is concluded in the EIS that the helipad activity will not be a significant noise nuisance. Notwithstanding this, several mitigation measures are presented in Section 11.2.6 of same in order to minimise the impact:

*All helicopter trips should be flown in accordance with noise abatement procedures. Typical noise abatement procedures are contained within the Helicopter Association International 'Fly Neighbourly' programme. The main principles of a "Fly Neighbourly" policy are:*

- *Maintain as high an altitude as possible;*
- *Observe low noise speed and descent observations;*
- *Use steep take-off and descent profiles to minimise low altitude flight;*
- *Reduce engine revs as soon as possible;*
- *Follow designated flight paths;*
- *Avoid residential areas where possible;*
- *Follow major thoroughfares and railway tracks where possible;*
- *Do not fly wide circuits.*

It is considered that the proposed helipad is not only necessary, but also normally expected in a facility of this type, having regard to the Inspector's commentary on the Mater case. In this instance, the siting of the facility has had regard to the optimal location from the point of view of the adjoining residents and the patients of the proposed hospital and potential flight paths. Furthermore, the instances of flights are so infrequent and of such a short duration so as to not materially impact on adjoining residential amenities.

We submit that, in the context of a fully functioning and modern national children's hospital and the context of the existing use of the campus as a hospital facility, the proposed helipad is acceptable.

#### 15.4.6 Site Capacity and Expansion

During the pre-application consultations with both An Bord Pleanála and Dublin City Council, both parties raised the issue of the capacity of the campus to accommodate not only the proposed development but also future planned developments and any expansion yet to be considered. This was expressed in the Inspector's Report in the pre-application consultation as (in the context of matters to be considered in the application):

- The constrained nature of the St. James' Hospital site and capacity for tri-location (children's hospital, adult teaching hospital and maternity hospital).
- The ability to accommodate the future growth / expansion of these developments individually and cumulatively.
- The developments now and into the future in the context of a new Master Plan for St. James' Hospital complex.

In this regard, and giving cognisance to the requirements for flexibility into the future having regard ongoing changes in healthcare requirements and provision, it was considered appropriate to prepare a draft Site Capacity Study for the St. James's Hospital Campus. This study would have regard to the known elements of future development (the new children's hospital and the tri-located maternity hospital) and those elements that are unknown (future expansion of the current hospital facilities on site). This was relayed to An Bord Pleanála at the meeting of 23<sup>rd</sup> June 2015.

The draft Site Capacity Study for the St. James's Hospital campus has been prepared by the project architects and is attached to this application. The draft study has had regard to planning policy in terms of zoning, development standards (such as height, plot ratio etc.) and physical planning constraints. It also takes into consideration the changing requirements of healthcare, such as the move towards single occupancy rooms and more generous floor to floor heights, in addition to the creation of a pleasant and inviting campus that integrates well with the surrounding neighbourhoods. The Study demonstrates one way in which future development could be accommodated on the campus. It does not prohibit an alternative approach to the development of the campus, rather indicates a clear and logical way in which one might choose to develop it to its full potential. It is clear, however, that the granting of permission for the new children's hospital on the St. James's site will not inhibit future development proposals and will, in fact, act as a catalyst for the creation of a world class health campus in the heart of Dublin City.

The draft Site Capacity Study, undertaken in response to the request of the Board in pre-Application consultations for information regarding the capacity of the St. James' Hospital site is, prior to completion, being circulated to relevant stakeholders such as St James Hospital, HSE, Dublin Midlands Hospital Group, Children's Hospital Group, and the National Paediatric Hospital Development Board.

Notwithstanding the above, it is worth noting that a debate arose during the consideration of the Mater application with respect to the capacity of that site for future expansion. The Inspector, in assessing this issue, came to the conclusion that:

*“The matter of expansion is not, in my opinion, a material consideration for the Board. The brief that has been developed has emerged from Government policy and the Board are not charged with adjudicating on the sufficiency or otherwise of the brief provided..., expansion was only one matter outlined in the design brief which was tasked by a government appointed group. Execution of the design brief is the responsibility of the applicant which was established with the sole purpose of delivering the hospital development. The role of An Bord Pleanála is to determine whether the development as proposed is or is not appropriate in respect of its impact on the local and citywide environment in planning, sustainability and environmental terms.”<sup>109</sup>*

In this regard, while a draft site capacity study has been carried out in order to allay any concerns that the Board may have with regard to the site going forward, we respectfully request that the Board assess the application as proposed in the first instance.

## 15.5 Davitt Road

It is proposed to use Davitt Road as a holding compound and staging area during the construction process. It is considered necessary to apply for a 10 year permission in order to ensure that any delays on the main contract are accommodated. It is proposed to reinstate Davitt Road on or before the commissioning of the main hospital building and the applicant is willing to accept a condition in this regard.

Davitt Road is zoned as Z10 in the Development Plan and the aim of this zoning is “to consolidate and facilitate the development of inner city and inner suburban sites for mixed-use development of which office, retail and residential would be the predominant uses.” This is a relatively wide ranging zoning that allows the consideration of a range of land uses. A construction compound is not listed in the range of permissible uses. In such instances, the Development Plan specifies that “uses not specified in any permissible or open for consideration categories and located in the following zones will be dealt with on their merits: zones Z3, Z4 (including key district centres), Z5, Z6, Z7, Z10, Z12 and Z14.” It is submitted that the Board may consider the use of the site as a construction compound during the construction period, having regard to the merits of the proposal.

In terms of the acceptability of the compound area on the Davitt Road site it is worth considering a number of factors:

- The site is currently vacant and subject to anti-social behaviour. The securing of a construction compound on the site, in addition to the construction of the adjoining ambulance base (Dublin City Council Reg. Ref. No. 2309/15 refers), will mean that the site will be supervised on a 24/7 basis.
- The compound will be screened from the public road and the surrounding residential properties by a 2.4m high construction hoarding that will act as a visual and acoustic barrier. In this regard, we would refer the Board to Chapter 11 of the EIS, relating to Noise and Vibration, concludes that “the free field external construction noise levels are well below 70dB  $L_{Aeq,1hr}$  for all residential locations assessed. In fact the predicted

<sup>109</sup> Inspector’s Report PL29N.PA00024

*construction noise levels are of a similar order of magnitude to the existing background noise levels. It is therefore concluded that the activity on the Davitt Road compound is unlikely to generate a significant noise impact."*

- The Health Service Executive submitted a Framework Plan for the Davitt Road site as part of the application for the ambulance base and the siting and layout of the construction compound has had specific regard to this plan and the phasing of same. It will not inhibit the design and construction of the second phase of development on this site, as set out in this Framework Plan. It has also been sited away from the public road so that it does not interfere with the future application for the landscaping strip as required by condition no. 12 of Reg. Ref. No. 2309/15.
- It is considered that it is in the interests of the proper planning and sustainable development of the area that this site, in public ownership, is used to ensure that any necessary off site staging and storing is carried out in a controlled and measurable manner. As such, it is submitted that the use of the Davitt Road site as a compound for the proposed new children's hospital development will result in less amenity impacts than if the alternative approach was taken whereby the staging area was not determined in the application or if there were unexpected externalities associated with construction activities.
- The use of the temporary compound supports the development of critical national health infrastructure and, as such, warrants particular consideration in this instance.

It is our view, therefore, that permission should be granted for the use of this site as proposed, having regard to the mitigation measures set out in the EIS.

## 15.6 Children's Hospital Satellite Centre Tallaght

In planning policy terms, the development of the new children's hospital satellite centre is compliant with the site zoning, does not conflict with specific objectives and being only three storeys is not of a height which affects Baldonnell Casement Aerodrome. It is, therefore, acceptable in principle.

With regard to Tallaght Town Centre, the aim is to achieve an efficient use of land appropriate to its context, with businesses and a variety of mixed-uses directed to locate within the hierarchy of urban centres, focused around public transport infrastructure<sup>110</sup>. The Development Plan recognises that the Town Centre provides a range of uses and states that the Tallaght Hospital is well established in the Town<sup>111</sup>.

In addition to the above, the Development Plan contains general policies which can be considered in the context of the new children's hospital satellite centre as outlined in Table 9 below.

<sup>110</sup> South Dublin County Development Plan, 2010-2016, pg. 202.

<sup>111</sup> South Dublin County Development Plan, 2010-2016, pg. 204.

Table 9: Development Plan Policy Compliance Schedule

Policy Topic	Policy Summary	Comment
Use	The Plan recognises Tallaght Town Centre as providing a range of uses and states that the Regional Hospital is well established in the Town. In this regard, the future development of Tallaght is supported by a number of policies including <i>inter alia</i> Policy TDL6: Public Transport in Tallaght, Policy TDL7: Tallaght County Town and Policy TDL10: Tallaght Education City and Innovation City.	The proposed Hospital use is considered to be an acceptable use and therefore planning compliant.
Innovation and the Economy	Tallaght Town Centre is considered to be the most appropriate location for an Intellectual Development Zone capability of promoting innovation with Policy EE9 on Economic Clusters stating that <i>"It is the policy of the Council to promote innovative economic sectors and encourage business clusters that exploit links with one another and/or third level and medical institutions."</i>	The proposed development will create employment and further reinforce the established medical use and create opportunities for greater economic and innovation synergies.
Building Height	In terms of the height of new buildings the Plan states that in the development of a diverse urban environment common to the traditional town, a variety of building heights is appropriate. In determining building height the Plan provides guidance for consideration including <i>inter alia</i> : <ul style="list-style-type: none"> <li>the height of surrounding development;</li> <li>a cohesive streetscape;</li> <li>perimeter blocks should be three to five storeys;</li> <li>locational factors;</li> <li>proportionality in relation to the street and open space; and,</li> <li>airport height controls.</li> </ul>	The new children's hospital satellite centre is wholly compliant with building heights as it: <ul style="list-style-type: none"> <li>Ties into the height of the exiting hospital.</li> <li>Provides a cohesive extension in terms of streetscape and form.</li> <li>As a block at a prominent location it conforms in terms of height, identity and presence.</li> <li>It is proportional to the space and hospital road it addresses.</li> <li>Adheres to airport controls.</li> </ul>
Car Parking	The car parking standard relating to the "Hospital" land use is classed as <i>"to be determined by Planning Authority"</i> . With regard to sites such as the Tallaght Hospital Campus which are located in the Town Centre and proximate to public transport, Policy T34 states, <i>"It is the policy of the Council that in areas well served by public transport or alternative means of access the car parking standards provided in the Development Plan shall be taken to be the maximum provision required."</i>	Due to the overall reduction in the intensity of the children's hospital use at the Tallaght Campus and considering the public transport provisions in the vicinity there are no additional car parking spaces proposed which is considered appropriate in this instance (save for urgent care spaces adjacent to the building).
Mobility Management	In relation to Mobility Management Plans the Development Plan states that these are required for larger sized developments which are likely to result in more than 500 employees and which will generate significant trip demand.	Due to the scale of the proposed development, particularly in the context of the overall campus, it is not considered necessary to provide a full mobility Management Plan.

## Overall Development Management

The existing hospital is set back from the surrounding lands with the result that planning considerations such as height and residential amenity are not impacted upon by the proposed development. The nature of the existing hospital land use and the limited scale of the new children's hospital satellite centre ensure that planning impacts are minimised. In terms of traffic and transportation, a robust assessment has been carried out and found the proposed development to be acceptable (see Chapter 6 of the EIS).

## Tallaght Town Centre Local Area Plan, 2006

The subject site is within the area covered by the Tallaght Town Centre Local Area Plan, which was adopted in 2006 and subsequently renewed in 2011. The LAP recognises the importance of community/social infrastructure in serving the needs of the community in areas such as *inter alia* health and emergency services and the requirement to ensure that such facilities are located so as to be used in an efficient and cost-effective manner. It is an objective of the LAP to:

*"facilitate the expansion and enhancement of existing community facilities and to facilitate the provision of a range of new community facilities to meet the needs of both the existing and future residents of Tallaght"<sup>112</sup>.*

As shown on Plate 15.1 below, the land use strategy contained in the LAP identifies the Tallaght Hospital campus as being institutional in nature. It states that these lands will cater for the expansion of existing institutional facilities and specifically that *"land uses should be primarily associated with the Hospital"<sup>113</sup>*. The new children's hospital satellite centre would represent such an expansion of the existing hospital use and therefore, fully accords with the TLAP.

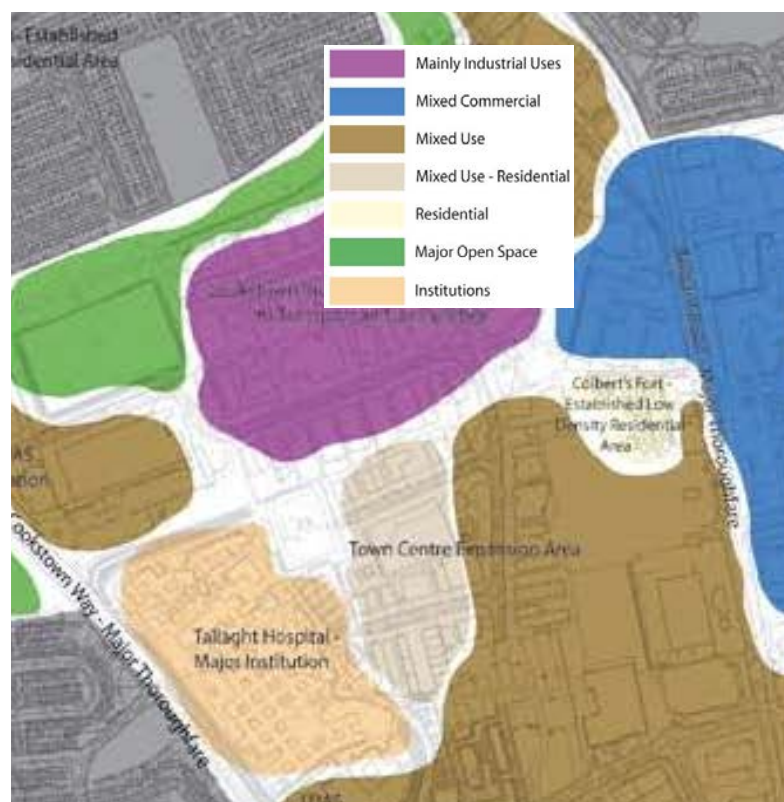
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<sup>112</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 36.

<sup>113</sup> Tallaght Town Centre Local Area Plan, 2006, pg. 101



Plate 22: Tallaght Town Centre Masterplan Uses



The LAP masterplan outlines matters to be considered in relation to the Tallaght Hospital Campus which include *inter alia*:

- that some mixed use non-hospital related development along Belgard Square may be desirable
- the area should be made significantly more permeable to vehicles and pedestrians
- East/West pedestrian access across the southern and northern extremities of the site would provide direct access to the LUAS, 'Hospital' and 'Cookstown' Stations
- that any major redevelopment should seek to build up existing structures in preference to the further sprawl of low lying buildings and that a new public square should be provided adjacent to the main hospital entrance.
- The LAP recognises the Tallaght Hospital Campus as lands for a further Masterplan/Conservation Plan.

The above are items which relate to overall campus matters/large scale developments and are outside the scope of the subject application, particularly given the scale of the proposed development, being a relatively minor extension to the existing hospital building. Notwithstanding the aforementioned, the design of the new children's hospital satellite centre was developed taking account of the above and does not inhibit any of same in the future.

In terms of detailed development control considerations, the LAP is less specific in relation to the Hospital Campus as opposed to the remainder of the LAP lands. This is due to the fact that a considerable amount of the overall LAP Masterplan lands are brownfield sites identified for redevelopment while the Tallaght Hospital lands are an established use that will be maintained and expanded into the future. Therefore, while it is appropriate to detail the surrounding lands in terms of development control measures the complex nature of a hospital operation requires more flexibility in order to deliver essential medical facilities. Notwithstanding the aforementioned, we provide below in Table 10 an assessment of standards relevant to the proposed development.

**Table 10: LAP Compliance Schedule**

Development Control Considerations		
Land Use	With regard to the hospital the LAP states that <i>"land uses should be primarily associated with the Hospital"</i> . With regard to institutional lands it is also an objective of the LAP to ensure access to all such areas is maximised, and major spaces are linked via amenable pedestrian routes.	The proposed use, being the new children's hospital satellite centre, is fully compliant with the land use designation.
Density	The LAP states that medium density areas are located within sections of Tallaght Hospital. It notes that these areas are not as well served by public transport and facilities as the higher density areas. However, sufficient levels of service are available and/or can be built upon to sustain more intensive levels of development than currently exist.	The subject site is located between the areas that can take higher densities and those areas where lower densities may be appropriate.
Plot Ratio and Building Height	While the LAP applies plot ratio and building height thresholds to the Tallaght Town Centre Area the Tallaght hospital campus lands are not included and deemed <i>"subject to a detailed Masterplan/Conservation Plan"</i> on both accounts.	While the LAP identifies plot ratios for surrounding lands it does not specify same for Tallaght Hospital Campus. However, through assessing the plot ratios set out for surrounding lands a figure of between 1.5 and 2.5 could be considered appropriate for the lands subject to subject to adhering to other standards and allowing for the proper operation of the campus. Therefore, the density proposed is considered acceptable.
Car Parking	While the LAP applies specific car parking parameters for certain land uses it does not specify for the land use "hospital". Where specific uses are not identified the parking parameters as set out in the South Dublin County Development Plan are applied.	As the new children's hospital satellite centre will be replacing the existing national children's hospital use at the campus there will be no intensification of use and therefore additional parking is not proposed. This is further supported by the levels of accessibility to public transport. Further details are provided within the Traffic Impact Assessment which is included in the application pack.
Access and Permeability	Improvements in accessibility and permeability are required to ensure that the Hospital becomes a more integrated part of the Town Centre. The Masterplan states that this can be achieved by creating additional entrance points and new streets and spaces that are fronted by development that is more responsive to the public domain i.e. a new public	Due to the limited scale of the proposed development in the context of the overall campus the improvements to access and permeability are confined to those areas proximate to the subject site. In particular, the proposed realignment of the access road to the proposed urgent care department and associated part removal of the mound along the main access road

	square and direct access to LUAS. In addition the Masterplan states that such alterations would also enable public transport (buses) to operate through the hospital site in the future.	improves visibility. In addition, designated pedestrian crossing are proposed with local improvements to the pedestrian routes around the proposed building are provided.
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The proposed development has been designed to:

- tie in with the existing building
- carry through the existing building height at this location
- incorporate the same modular approach to the façade composition
- utilise materials that both take reference from the existing structure while also expressing a subtle identity through the introduction of contemporary materials and colour

Therefore, it is considered that the proposed development complies with the relevant development control standards while also delivering the correct architectural solution.

## 15.7 Children's Hospital Satellite Centre Connolly

The Connolly Hospital Campus is located in the administrative area of Fingal County Council and the Fingal County Development Plan 2011- 2017 is the relevant statutory plan. Under this Plan the Campus lands are zoned CI:

*"Community Infrastructure", see Plate 4 below, with the objective to "provide for and protect civic, religious, community, education, health care and social infrastructure."*

The Vision for such lands is to:

*"Protect and promote an inclusive county, accessible to all members of the community, facilitating the sustainable development of necessary community, health, religious, educational, social and civic infrastructure. A wide range of different community facilities, civic facilities and social services exist within the County ranging from those of regional importance such as education and health facilities, to those of local and neighbourhood importance... It is important to facilitate the development and expansion of such services in order to deliver a quality environment whilst improving the quality of life for all."*

The use Hospital (for public operators only) is Permitted in Principle under the CI zoning. Local Objective 539 also applies to the Connolly Hospital Campus which seeks to:

*"facilitate and promote synergies between Connolly Hospital and related Industries (onsite)".*

The Campus could also be described as being located in a Transitional Zone about which the Development Plan states it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones<sup>114</sup>, as supported by Policy Objective Z04. However, the use of the subject lands as a hospital is well established while Objective Z06 seeks to:

<sup>114</sup> Fingal County Development Plan, 2011 – 2017, pg. 328.

"ensure that developments ancillary to the parent use of a site are considered on their merits".

The Development Plan includes the term 'community infrastructure', which refers to infrastructure and facilities such as public health facilities, stating that the Council will continue to support the development of community infrastructure where there is a need for such<sup>115</sup>. In this regard Objectives CI03 seeks to:

*"ensure community facilities are flexible in their design and promote optimum usage",*

while Objective CI07 seeks to:

*"support the provision of new community centres and facilitate the refurbishment and extension of facilities where there is a need for such works. Such facilities shall be accessible by a range of travel modes with an emphasis put on walking, cycling and public transport use..."*

In relation to lands zoned for Community Infrastructure the Development Plan states that the objective of this zoning is to provide for and protect community and social infrastructure and facilitate the sustainable development of necessary community, health, religious, educational, social and civic infrastructure<sup>116</sup>. Specifically with regard to health centres/services it identifies Connolly Hospital as one of the three public hospitals within Fingal and notes the aim of the Primary Care Strategy, 2001 to promote the development of a team-based approach to service provision. The Development Plan outlines that consequently, practices wishing to develop their premises are encouraged to provide a 'one stop' primary health and community care service, integrated under one roof, noting the benefits in locating such medical/health care facilities in a location close by or adjacent to other community facilities, shops and public transport, such as town, district or neighbourhood centres<sup>117</sup>. In this regard Objective CI34 seeks to:

*"Support and facilitate the development of health centres, hospitals, clinics and primary care centres in appropriate urban areas."*

All the above policies and objectives support development at Connolly Hospital with a clear recognition that it is an important component of the community infrastructure of the County. The new children's hospital satellite centre will add further to the range of services at the hospital in compliance with the provisions of the Development Plan.

### **Blanchardstown Urban Structure Plan, 2007**

The Blanchardstown Urban Structure Plan, 2007 sets out the vision, development themes and opportunities for the Blanchardstown area. In relation to the Science and Technology Theme, Connolly Hospital is recognised as an existing resource. As part of the development opportunities contained in the Plan, essential infrastructural improvements are identified including the provision of integrated educational, health and community facilities<sup>118</sup>.

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<sup>115</sup> Fingal County Development Plan, 2011 – 2017, pg. 265

<sup>116</sup> Fingal County Development Plan, 2011 – 2017, pg. 265

<sup>117</sup> Fingal County Development Plan, 2011 – 2017, pg. 272.

<sup>118</sup> Blanchardstown Urban Structure Plan, 2007, pg.14.

The Plan identifies 11 no. development opportunity areas which includes *inter alia* Area 5: Connolly Memorial Hospital – a centre of excellence in health care specialisms with the uses of medical specialists/facilities/clinics and residential identified. It describes the hospital as being a major resource asset to Blanchardstown and as being well placed to advance as a model of excellence in health care and medical specialisms.

### Development Control

There are no detailed development control measures outlined for the Connolly Hospital Campus. This is due to the fact that the Development Plan control standards are such that they generally seek to assess proposals on their individual merits rather than overly prescribe standards in advance.

Therefore, while it may be appropriate to detail and control certain land uses more stringently (e.g. residential) control measures for developments such as that proposed require greater flexibility taking account of the complex nature of a hospital operation. Notwithstanding the aforementioned, we provide below in Table 11 an assessment of standards relevant to the new children's hospital satellite centre at Connolly Hospital.

**Table 11: Development Plan Policy Compliance Schedule**

Development Control Considerations		
Land Use	With regard to the hospital use the Fingal County Development Plan 2011 – 2017 seeks to provide for and protect community and social infrastructure with the proposed use permitted.	The proposed use, being the new children's hospital satellite centre, is fully compliant with the land use designation.
Design	In relation to design the provisions of Objective UD01 should be noted i.e. for developments in excess of 5 residential units or 300m <sup>2</sup> of retail/commercial/office development in urban areas a detailed design appraisal has to be submitted which <i>inter alia</i> explains the design principles and design concept, demonstrates how the twelve urban design criteria have been taken into account, when designing schemes in urban areas, outline how the development meets the FDP Objectives or other Plans affecting the site, include photographs and other illustrations, outline detailed proposals for open space and outline how Green Infrastructure integrates into the scheme. In addition contemporary architecture is generally promoted for new developments, Objective UD02.	The proposed development represents a contemporary architectural approach while also respecting the particular setting of the Campus and the form of the existing hospital buildings. The Architectural Report prepared by the Project Architects and included in the planning application package provides photos and illustrations which contextualise the subject site and proposed development. We note that Policy UD01 only applies to residential/retail/commercial/office developments and not an institutional use as proposed. However, the Architecture Report provides all the necessary information relevant to Policy UD01.

Plot Ratio and Building Height	The Fingal County Development Plan 2011 – 2017 does not identify a specific height or plot ratio for the subject lands.	While the Development Plan does not identify a plot ratio for the campus the proposed development is considered appropriate taking account of the building depth, site coverage and height, all of which are in accordance with the existing hospital.
Car and Cycle Parking	Table TO3b sets out the maximum Commercial Car Parking Standards which for the land use “hospital” is 1.5 spaces per bed and for the land use “Clinic and Group Medical Practices” is 2 spaces per consulting room. The Fingal Development Plan states that the car parking standards provide a guide to the number of required off street parking spaces acceptable for new developments and that Council policy will be to manage and control it at a level appropriate to its location <sup>119</sup> . Objective TO58 seeks to “balance the car parking requirements required under Tables TO3a and TO3b against the provision of accessible public transport”. The Fingal Development Plan states that developments located within <i>inter alia</i> 500m of a QBC or high quality bus service and/or 1000m of a Luas/Dart/ Metro/Rail station can operate effectively with less parking provision and that the required number of off-street parking spaces in such cases will be determined on merit by the Planning Authority <sup>120</sup> . With regard to cycle parking minimum requirements, outlined in Table TO1, these will be determined by the Planning Authority.	The new children’s hospital satellite centre will require car parking spaces which is provided in accordance with Development Plan standards and policies. Further details are provided within the Traffic Impact Assessment which is included in the application pack.
Open Space	Objective GI11 requires all new development to contribute to the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure, as appropriate, with Objective OS23 seeking the provision of green corridors in all new developments where the opportunity exists. In addition Objectives GI32, UD16 and UD17 seek the provision of green roofs and green walls as an integrated part of SuDS and which provide benefits for biodiversity, wherever possible. With regard to open space provision Objective OS02 addresses this issue in relation to residential open space provision. In relation to institutional lands Objective OS07 seeks: “Retain in open space use institutional lands, landscaped	Due to the limited scale of the proposed development in the context of the overall campus the provision of open space is confined to those areas proximate to the subject site. A Play Courtyard and Therapy Garden are integral to the design and respond to the particular user needs. In addition, designated pedestrian crossing are proposed while local improvements to the pedestrian routes around the proposed building are provided.

<sup>119</sup> Fingal County Development Plan, 2011 – 2017, pg. 122.

<sup>120</sup> Fingal County Development Plan, 2011 – 2017, pg. 124.



	<i>demesnes and similar properties with established recreational or amenity uses, as far as practicable. However, in the event of permission for development being granted on these lands, open space provision in excess of the normal standards will be required to maintain the open character of such parts of the land as are considered necessary by the Council for this purpose."</i>	
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The proposed development has been designed to:

- Connect with the existing building
- Adhere to the existing building height at this location
- Incorporate elements of the existing hospital façade where appropriate
- Utilise materials that both take reference from the existing structure while also expressing a subtle identity through the introduction of contemporary materials and colour

Therefore, it is considered that the proposed development complies with the relevant development control standards while also delivering the correct architectural solution.

## 15.8 Development Contributions

As the project is publically funded we would respectfully request that the Board considers the matter of development contributions in light of any available exemptions. In addition to this, it is submitted that the hospital itself could be regarded as a "community facility" and that there are significant improvements to the public realm being proposed in this application. As such, where there may be opportunities for reducing the payable development contributions, we would request that the Board closely examines this option.

It is noted that the various constituent elements of the project are subject to different Development Contribution Schemes:

- The new children's hospital building, Family Accommodation unit, the Children's Research and Innovation centre and the construction compound on Davitt Road – Dublin City Council
- Children's Hospital Satellite Centre Tallaght – South Dublin County Council
- Children's Hospital Satellite Centre Connolly – Fingal County Council

### St. James's Hospital Campus Development (including Davitt Road)

The relevant scheme is the Dublin City Council Development Contribution Scheme 2013-2015.

Section 11 of the scheme sets out the categories of development that will be exempted from the requirement to pay development contributions including inter alia:

- Development to be used for social, recreational or religious purposes and not to be used for profit or gain
- Ancillary surface car parking

While it is acknowledged that Section 12 of the scheme specifically excludes hospitals from the exemptions, we submit that there is a case to suggest that publically funded hospitals should be treated differently to private hospitals and could avail of the exemptions as set out above.

Notwithstanding this, Section 13 sets out the categories of development that will be liable for a reduced rate of development contributions including inter alia:

- Where an applicant is granted permission to demolish in part or in full an existing building and replace with another, then the development contribution payable is to be charged on the net additional floorspace created.
- Ancillary non-surface, non-residential car parking will be calculated at 50% of the applicable rate of contribution

In this regard, the following figures are of relevance:

- Gross floor area of proposed development
  - New children's hospital building: 118,113 sq.m.
  - Family Accommodation Unit: 4,354 sq.m.
  - Children's Research and Innovation Centre: 2,971 sq.m.
- Area of basement parking: 32,223 sq.m.
- Area of buildings to be demolished: 20,539 sq.m.
- Area of Davitt Road construction compound: 0.8 ha.

### Tallaght Hospital Campus

The relevant development contribution scheme for the children's hospital satellite centre Tallaght is the South Dublin County Council Development Contribution Scheme 2013-2015.

The Scheme at Section 10 sets out the categories of development which will be exempted from the requirement to pay development contributions or will pay a reduced rate, including the following:

- Development by charities for non-profitable development shall be exempt.
- Car parking assessed as being ancillary to the proposed development, and generally in line with Development Plan standards, whether surface or non-surface, is exempt.
- Car parking assessed as being non-ancillary to the proposed development, will be charged at a rate of 50% of the non-residential rate on a per space basis.

- Not for profit development carried out by bodies exempted from the requirement to pay a planning application fee, in accordance with Article 157 of the Regs (as amended) shall be exempt. The exemption is stated below; Development proposed to be carried out by or on behalf of a voluntary organisation, and which in the opinion of the PA
  - is designed or intended to be used for social recreational, educational or religious purposes by the inhabitants of a locality, or by people of a particular group or religious denomination, and is not to be used mainly for profit or gain,
  - is designed or intended to be used as a workshop, training facility, hostel or other accommodation for persons with disabilities and is not to be used mainly for profit or gain.
- Substations / Switch Rooms shall be exempt.
- Ancillary plant rooms (where plant is not core activity/operation) shall be exempt

The relevant statistics for the children's hospital satellite centre Tallaght are as follows:

- Gross floor area of proposal: 4,466 sq.m.
- Net additional space to Tallaght Hospital (GFA less existing space to be refurbished of 1,324 sq.m. ): 3,142 sq.m.
- Ancillary plant room space:

### Connolly Hospital Campus

The relevant scheme relating to the children's hospital satellite centre Connolly is the Fingal County Council Development Contribution Scheme 2013-2015.

The Scheme at Section 10 sets out the categories of development that will be exempted from the requirement to pay development contributions under the Scheme as follows;

- Developments by registered charities and other organisations having exemption from income tax and corporation tax under Section 20 of the Taxes Consolidation Act 1997 and currently holding an exemption certificate from the Revenue Commissioners.
- Non – Commercial community related developments by voluntary non-profit making groups, clubs or organizations.
- Ancillary, surface and underground car parking is exempt. (i.e. Councils Development Plan standards). Stand alone commercial car parks are subject to a 50% reduction in the commercial rate.

The gross floor area of the children's hospital satellite centre Connolly is 5,093 sq.m. which includes 103 sq.m. of refurbishment of existing space.

## 16. Overall Conclusion on the Case for approval

The case for the development of the National Paediatric Hospital can be said to centre on the creation of a world class health facility designed to benefit the children and young people of Ireland. This report highlights those aspects of the application that are relevant to the planning assessment. In summary, the following should be noted:

1. The proposed children's hospital is arguably one of the most important public infrastructure projects to be brought forward in Ireland in the past fifty years. The strategic importance of the project has been reflected in a range of Ministerial and wider public policy commitments and its development will be key to delivering a fundamental step-change in healthcare outcomes for children and young people in the state.
2. The proposal will be the largest health care project of its kind ever undertaken in the country and such will be its scale and nature that its positive medical, educational, research and wider economic impacts will be of regional, national and, perhaps, international importance. The development has the potential to create a fresh impetus to economic clustering around the St. James's Hospital campus and to stimulate local regeneration in a manner rarely seen in Dublin. These benefits will complement and support both national and local policy as described in this planning report.
3. Inevitably a project of this scale will result in some local impacts. A considerable amount of time and effort has been expended by the relevant authorities in appraising alternative sites for the scheme. This work clearly points to the St. James's as the most appropriate have regard to health care delivery; planning policy and development management considerations. The NPHDB has equally been cognisant of the need to protect, as far as practical, local amenities and to this end, the design of the new children's hospital and satellite centres has undergone numerous iterations to mitigate potential negative impacts and take account of community concerns raised during extensive consultations.
4. Work undertaken by the NPHDB confirms that the 'tri-location' model of service delivery (new children's hospital, existing St. James's Hospital and a potential maternity hospital) supported by the proposed satellite sites at Tallaght and Connolly Hospital campuses would provide the most effective health outcomes for the community. Site capacity analysis at St. James's evidences that the proposed level of development can be accommodated in a satisfactory manner. Similarly, proposed facilities at the two satellite sites can be accommodated in accordance with Development Plan policies and with no significant losses of local amenity.
5. Having regard to the above, we submit that the proposed children's hospital proposals will be appropriate development at the St. James's Hospital campus and at the two satellite sites at Tallaght and Connolly hospitals. It is considered that the proposed

developments will accord with the provisions of the National Development Plan and the extant and emerging Development Plans for their respective areas. It is submitted that the proposed developments will be in accordance with the proper planning and sustainable development of the area for the following reasons:

- (i) The proposals satisfy the objectives of Government policy, the National Development Plan, the National Health Strategy and the requirements of the Health Service Executive to deliver the development of a National Children's Hospital at the application site;
- (ii) The Government has resolved to proceed with the St. James's Campus site as the location of the new children's hospital following consideration of a range of expert evidence (including the Dolphin and Clear Martin reports) commissioned by the Minister of Health;
- (iii) The Objectives and Policies of the National Spatial Strategy Transport 21 and the Regional Planning Guidelines for the Greater Dublin Area will be met in relation to:
  - o The desire to concentrate development in locations where it is possible to integrate employment, community services, retail and public transport;
  - o Encouraging mixed use and well-designed higher density development, particularly near town centres and public transport nodes like the LUAS stops;
  - o Encouragement of planning authorities to work with the health services with regard to provision for community based primary care centres and hospital care... supporting their integration into new and existing communities.
- (iv) The proposals comply with the relevant policies of the Dublin City Development Plan 2011-2017 in the case of the new children's hospital, Family Accommodation Unit, Children's Research and Innovation Centre and Davitt Road; the South Dublin County Development Plan 2011-2017 as regards the Tallaght satellite proposal and the Fingal Development Plan 2011-2017 in relation to the Connolly Hospital development.
- (v) The Tallaght proposals reflect: The policies of the Tallaght Town Centre Local Area Plan 2006 which seeks to expand and improve Tallaght Hospital campus and the wider town centre.

- (vi) The scheme fits with the long established use of the St. James's Campus (and satellite sites) for public health services; including their expansion and improvement and the earlier grant of permission by Dublin City Council for a private hospital on the St. James's site.
- (vii) The plans have regard to the site context for the new children's hospital proposals as assessed in the draft site capacity studies and Environmental Impact Statement accompanying the planning application
- (viii) The design and layout of the proposed development as described in the site draft site capacity study and as assessed by the Environmental Impact Statement would have no significant environmental impacts and, where necessary, appropriate mitigation measures will be put in place to limit any impacts.
- (ix) There will be significant national, regional and local economic benefits that would be generated by the proposals, including major job retention and creation of c. 3,000 permanent (FTE) posts and c. 2,000 temporary jobs during construction and commissioning.
- (x) The proposals will result in important social benefits in the form of local community gains including substantial new job, education and training opportunities, especially for young people, together with local procurement requirements to encourage more local supplier engagement and employment prospects.
- (xi) There will be much needed environmental enhancements with improvements to the LUAS linear open space; the public realm within, and adjoining, the St. James's Campus and better accessibility within and through the site.
- (xii) There will be significant measures to increase modal shift from the private car to public transport in respect of hospital employees and visitors.
- (xiii) It is envisaged that substantial physical regeneration benefits will be catalysed by redevelopment of local vacant and underused sites, which along with the new children's hospital proposals, will help transform the area and boost investment confidence.
- (xiv) There are no alternative sites that could deliver the proposed model of care as effectively, or with the same degree of economic and social benefits, as the application development



Hence, in terms of a decision on where the planning balance lies, it is considered that any identified negative impacts of the proposed development (such as loss of local amenity or increased traffic) will by far outweighed by the highly significant well-being/health; economic and social/community benefits that will arise from the proposals. It is concluded that the National Paediatric Hospital proposals accord with the proper planning and sustainable development of the areas in which they would be located. The application is therefore commended to the An Bord Pleanála for approval.