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Re: Material Alterations to Dublin City Draft Development Plan 2022 - 2028

Dear John,

Thank you for the opportunity to feedback on the proposed Material Alterations to the Dublin City Development Plan for the period 2022-2028. We circulated your correspondence to the Health Service Executive (HSE) Executive Management Team (EMT) and Senior leaders and invited contributions and submissions.

Further to our letter of 28/01/2022, we have received the following feedback for consideration from our colleagues in the HSE:

**Health Promotion & Improvement/Health & Wellbeing Team:**

An observation for consideration is the need to mention the Sláintecare Healthy Communities SHC in Chapter 5. While Healthcare and Sláintecare is mentioned, the specific SHC projects of which the Local Authority and HSE and Community Partners are key stakeholders seems to be missing. Either under 5.5.8 Social and Community Infrastructure or under the Healthcare section. It is broadly mentioned under the policy element, perhaps this is sufficient?

**Capital and Estates:**

**1. General:**

This submission addresses the key issues that affect the provision of health related facilities and services within the administrative area of Dublin City Council, highlighting the specific policies and objectives which will reduce the barriers of a fully functioning healthcare system. It is important that DCC are aware of the functional and clinical requirements of the health sector.

The Development Plan as proposed does not acknowledge the special role that the HSE fulfils and that distinguishes it from all other organisations. It should be noted that is not proposed that DCC introduce policies or objectives for healthcare that are not afforded to other organisations in the Draft Development Plan.

Having considered the Proposed Draft Development Plan and associated Material Alterations, it is considered that the Draft Development Plan could do more in the HSE's view to recognise the unique operational, functional and clinical requirements of healthcare facilities. A flexible approach is sought to deal with the unique requirements of the health sector and the need to develop and expand existing facilities. The HSE is concerned that the

Development Plan as proposed may result in difficulties in the provision of healthcare in the city over the operation of the Plan.

The proposed policies and objectives will allow a case by case assessment of applications.

### **1. Policies and Objectives:**

The Development Plan has a series of policies and objectives covering educational facilities for the Department of Education and Skills. It is proposed that similar policies and objectives are introduced covering healthcare which is equally important and perhaps more so as it serves all ages and as the age profile of the residents of the city is rising.

The HSE welcomes the inclusion of QHSN50 covering the Sláintecare Plan but requests that the Draft Development Plan further recognises the importance of the services provided by the HSE by also including additional policies and objectives that are consistent with the policies and objectives that are provided for educational facilities. It is therefore proposed that the single policy covering Sláintecare (QHSN50) is augmented by further policies addressing the provision, the need and the siting of healthcare facilities.

### **2. Development of Healthcare Facilities (including acute hospital sites)**

The HSE is responsible for the provision of public health and personal social care services. This is organised and provided in a range of settings including hospitals, primary care centres, enhanced community care centres, health centres and offices, residential care settings and other residential facilities, clinics and other facilities.

The healthcare system faces challenges in operating in a continually changing environment. Healthcare practices and technologies are constantly evolving, which necessitates changes in the model of care and in healthcare facilities. As an example, the COVID pandemic required considerable development of additional facilities within a very short timeframe.

The Development Plan sets out particular Objectives for other organisations (including the OPW for the development of heritage facilities) and for the expansion of particular sites (including the Gallery of Photography in CUO18). Public hospitals and healthcare facilities are important community infrastructure and are not afforded the same objectives regarding the support for expansion.

While St James Hospital is covered by Strategic Development Regeneration Area 14 "James Healthcare Campus and Environs", all other acute hospitals including Beaumont, Mater St Misericordiae, and St Vincent's' University Hospital are not covered by any objectives regarding the expansion of facilities as provided for in other sectors i.e. the Gallery of Photography.

Therefore it is proposed that an additional objective will assist the upgrading and expansion of public healthcare facilities.

### **3. Chapter 5 Quality Housing and Sustainable Neighbourhoods**

It would appear that the most appropriate position for additional policies and objectives is in Chapter 5. It is proposed that the following additional policies and objectives are added to augment QHSN50 Sláintecare Plan (after QHSN50):

*'QHSN XX Healthcare Provision.*

*(i) To support provision of new and the expansion of existing healthcare facilities having*



regard for the requirements of the HSE.

*(II) To support the ongoing development and provision of healthcare facilities in the city.  
QHSN XX Assess Need for New and Expanded Healthcare Facilities.*

*(i) To continue to work with the HSE on the healthcare needs of the city in order to assess the need for new and expanded healthcare facilities and to progress healthcare projects in line with population and health service needs.*

*(ii) To work with the HSE in relation in the identification of suitable sites for new and extended healthcare facilities.*

*QHSN XX Healthcare Facilities*

*To facilitate the provision of healthcare facilities as an integral part of proposals for new and mixed use developments in locations or close to the areas of greatest residential expansion or greatest amount of unmet demand for healthcare facilities.*

*QHSNO XX*

*To support, co-operate with and facilitate the upgrade and expansion of hospitals in line with the demands of the healthcare needs of the city.'*

Note: These wording are consistent with the policies and objectives provided for educational uses in QHSN51 and QHSNO14 and afforded to DoES in provision of educational facilities, to the OPW for heritage sites and to the Gallery of Photography in CUO18.

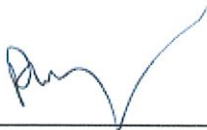
**Summary:**

It is requested that the current single objective is augmented by further policies as set out above.

The above amendments and /or provisions are sought for no purpose other than to ensure a fully functioning modern healthcare system that provides the highest standards of care is available in the city. The aim is unique to the HSE as a public service provider. The above recommendations ensure that the Draft Development Plan would acknowledge this fact and provide for a flexible approach for the unique operation, functional, land use and clinical requirements of the public healthcare sector.

Again, we would like to thank the Dublin City Council for their ongoing support and wish you well with the implementation of this plan.

**Yours sincerely,**



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**Dr. Philip Crowley,  
National Director,  
Strategy and Research**

