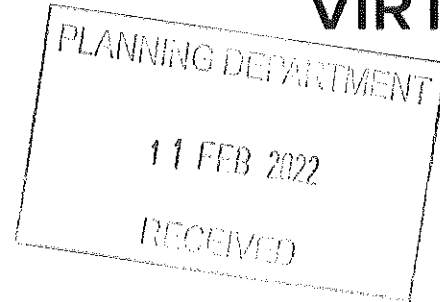


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Dublin City Council
Development Plan Team,
Planning and Property Development Department,
Dublin City Council,
Wood Quay, Dublin 8

Date: 11th February 2022

**RE: SUBMISSION ON DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028 IN
RELATION TO LANDS AT THE COOMBE WOMEN'S AND INFANT'S UNIVERSITY
HOSPITAL**

Dear Sir/Madam,

1.0 INTRODUCTION

1.1 This submission is made on behalf of our client, Coombe Lying-in Hospital (trading as Coombe Women and Infants University Hospital), Cork Street, Dublin 8, D08 XW7X, who wish to make a submission on the draft Dublin City Development Plan 2022 – 2028.

1.2 This submission seeks to emphasise that:

- a. Whilst there is Government policy to seek the relocation of the Coombe Hospital to the St. James Hospital campus, this is a long-term objective for which there is presently no definitive plans, timescale nor funding allocation.
- b. It is considered that some specific content of the Draft Dublin City Development Plan 2022 – 2028 should be amended to reflect the fact that the relocation of the Coombe Hospital to the St. James Hospital campus is highly unlikely to happen during the Development Plan period and as such adjustments to Development Plan text, policies and mapping should be made to ensure that the Development Plan does not undermine the ongoing need for maintenance and redevelopment of the existing Coombe Hospital campus in the intermediate period up to relocation to the St. James campus.

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2.0 BACKGROUND AND CONTEXT

- 2.1 The Coombe Hospital is long established at the existing campus on Cork Street. It is essential to note that the Hospital has no short or medium term plans to vacate the campus.
- 2.2 There is a Government led objective for relocating the Coombe Women and Infants University Hospital to the St James's Hospital campus in order to achieve the tri-location of adult, paediatric and maternity services. However, this remains an objective and there are no plans nor timeframe in place for the Coombe Hospital relocation. We refer to transcripts¹ of a response from Minister Donnelly to a question raised in the Dail on the 15th December 2021, which reads, *inter alia*:
- 2.3 In relation to the relocation of the three other standalone maternity hospitals, the HSE Capital Plan 2021 indicates that the relocation projects for the Coombe, the Rotunda and University Maternity Hospital Limerick are at an early stage. It should be noted that all of these project proposals must progress through a number of approval stages, in line with the Public Spending Code, including detailed appraisal, planning, design and procurement, before a firm timeline or funding requirement can be established
- 2.4 It is imperative that the Coombe Hospital continues to provide the services and facilities needed by patients and staff on the existing campus.
- 2.5 The hospital continues to receive HSE funding for significant building projects on the existing Campus. This is a clear statement to the effect that there are no short or medium term objectives to re-locate the hospital. The following building projects on the campus are either on site, in receipt of planning permission, or in the planning process.
 - A new laboratory building of circa 1,340 sq.m (planning granted under Reg. Ref: 4049/19) which is currently under construction. Phase-1 (New build) due to be completed in June 2022. Phase-2 (Refurbishment of the existing Lab) to be completed in July 2023.
 - A new Colposcopy building of circa 998 sq.m (planning application currently under consideration under Reg. Ref: 3537/21). The projected construction value of this project is €7.4 million.

¹ <https://www.kildarestreet.com/wrans/?id=2021-12-15a.591>

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- A new emergency department building of circa 1,010 sq.m (planning granted under Reg. Ref: 2013/20). The projected construction value of this project is €9.35 million.
- 2.6 In addition to the above, there are a number of other infrastructure projects currently in progress at the Hospital, namely:
- New Operating Theatre Block and Neonatal Intensive Care is currently under pre-planning design and has a project construction value of €34.7 million.
 - Ongoing internal refurbishment taking place in the hospital i.e. St Patrick's Ward Refurbishment commenced on 4 February 2022 with a value of value of €3.4 million, creation of new isolation rooms with a value of €700k, and the refurbishment of Gynaecology Day Ward with a tender value of €700,000.
- 2.7 These are significant projects which are required to ensure that the Hospital can continue to meet the clinical needs of its current and future patients.

3.0 DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

- 3.1 The Draft Dublin City Development Plan 2022 – 2028 includes Policy CEE30 relating to 'Hospitals and Healthcare', and which reads as follows:

"To recognise that hospitals and the wider healthcare sector are crucial to the wellbeing of the city, including as major sources of employment, economic development and innovation; and to promote and facilitate their development and expansion".

- 3.2 This policy is supported. It recognises the critical role that hospitals provide to the public.

- 3.3 Policy CEE31 is titled 'Strategic Role of Hospital Complexes' and reads as follows:

"(i) To recognise the strategic economic role of the hospital complexes in the city, including the new National Paediatric Hospital and the proposed National Maternity Hospital at the St. James campus and to promote their wider catchment areas as suitable locations for new healthcare-related development. (ii) To promote and facilitate the continued development of the Dublin 8 area including SDRA 14 (St. James Medical Campus & Environs) as a medical hub of excellence".

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3.4 Whilst there is no objection to the support for the new National Maternity Hospital at the St. James campus², it is considered important that the wording of the Policy is carefully considered so as not to undermine the ongoing need for maintenance and expansion of the existing Coombe Hospital campus in the intermediate period up to relocation to the St. James campus.

3.5 The existing Coombe Hospital campus is included with SDRA 11 (St. Teresa's Gardens and Environs) in the Draft Plan. The introductory text for SDRA 11 in Chapter 13 of the Draft Plan states that:

"Also adjoining the site is the Coombe Hospital site (2.32 hectares), which is proposed to be re-located to the St. James's Hospital Campus, creating a longer term opportunity site. The overall site, therefore, equates to c13Ha".

3.6 The reference to 'proposed' to be relocated is considered to be premature. Whilst there is Government level policy promoting the relocation, there is no roadmap for this to be achieved.

3.7 Under a sub-heading of 'Urban Structure', the following is stated:

"The potential for further integration with the Coombe Hospital is indicated on the Guiding Principles Map but is indicative only. Regard will need to be had to any flooding constraints in the redevelopment of the Coombe Hospital lands in terms of land use and block layout. Integration of the White Heather Industrial Estate lands should be investigated in the future".

3.8 The image below is an extract from the SDRA. The Guiding Principles for the SDRA, as illustrated in the image, clearly assume the redevelopment of the Coombe Hospital site within the plan period. It is respectfully submitted that such an approach is premature and has the potential to undermine the critical requirement for ongoing maintenance and, where necessary, development and expansion of the facilities at the existing Coombe Hospital campus.

² As a clarification, the new National Maternity Hospital is being facilitated on the St. Vincent's University Hospital Campus

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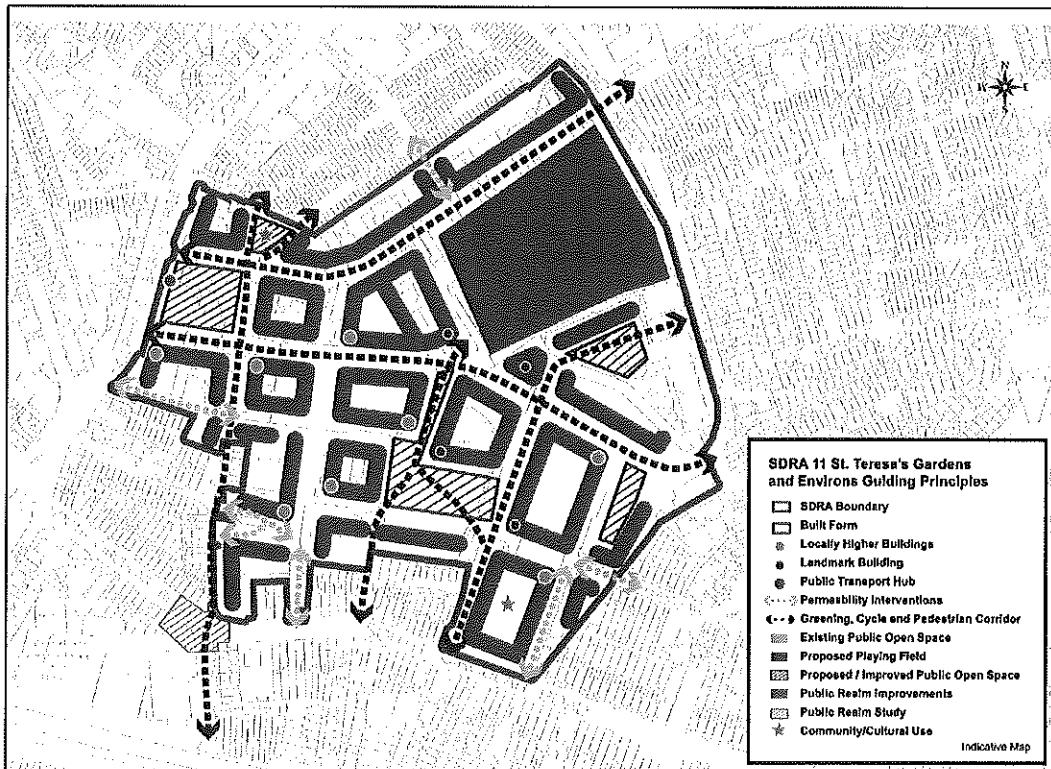


Figure 1: Extract from SDRA 11, Chapter 13 of the Draft Dublin City Development Plan 2022 - 2028

3.9 SDRA 14 relates to 'St. James's Hospital'. The following text is included in Chapter 13 of the Draft Plan relating to this SDRA:

"The Hospital has identified the following programme of works over the course of the development plan: (i) Trinity St. James's Cancer Institute, (ii) Ambulatory Care Centre,

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(iii) relocation of the Coombe Women's and Infants Hospital, (iv) critical care centre, and (v) acute mental health inpatient and community facility".

3.10 It is considered that this statement should be qualified with reference to the long-term nature of the objective for the relocation of the Coombe Hospital.

4.0 GROUNDS OF SUBMISSION

4.1 As has been set out above, it is respectfully submitted that references to the relocation of the Coombe Hospital to the St. James campus site should be carefully qualified or adjusted to ensure that there is not unintentional undermining of the requirement, on clinical and public health grounds, for the ongoing maintenance and development/expansion of the facilities at the existing Coombe Hospital campus.

4.2 Specifically, we respectfully request that consideration be given to the following amendments to the Draft Plan (additional text in red, deleted text in **bold strikethrough**):

A. Policy CEE31 to be amended as follows:

*"(i) To recognise the strategic economic role of the hospital complexes in the city, including the new National Paediatric Hospital and the **proposed** potential long term National Maternity Hospital relocation to **at** the St. Vincent's University Hospital campus and to promote their wider catchment areas as suitable locations for new healthcare-related development, (ii) continue to support the ongoing maintenance, upgrade, and expansion of existing hospital campuses as required to meet clinical needs, and ~~(ii)~~ (iii) To promote and facilitate the continued development of the Dublin 8 area including SDRA 14 (St. James Medical Campus & Environs) as a medical hub of excellence".*

B. Amended the introductory text of SDRA 11 in Chapter 13 as follows:

"Also adjoining the site is the Coombe Hospital site (2.32 hectares), which is proposed to be re-located to the St. James's Hospital Campus in the longer term, creating a longer term opportunity site. The overall site, therefore, could equate to c13Ha in the event that the Coombe Hospital lands are included. The SDRA guiding principles recognise the long-term potential for the redevelopment of the Coombe Hospital lands, subject to relocation of the Hospital, but are not reliant on inclusion of these lands and co-ordinated development can be advanced in the absence of the release of these lands during the period of this Development Plan".

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- C. Amend the text under the sub-heading of 'Urban Structure' of SDRA 11 in Chapter 13 as follows:

"The potential for further integration with the Coombe Hospital is indicated on the Guiding Principles Map but is indicative only and co-ordinated development of the SDRA lands in the plan period is not contingent on the release of the Coombe Hospital lands. Policy will continue to support the ongoing upgrade and expansion of facilities on the Coombe Hospital lands to meet the clinical needs of the hospital so long as the Hospital remains at this location. In the event of relocation of the Hospital, regard will need to be had to any flooding constraints in the redevelopment of the Coombe Hospital lands in terms of land use and block layout. Integration of the White Heather Industrial Estate lands should be investigated in the future".

- D. Amend the SDRA 11 image to exclude any indicative layout or use proposals on the Coombe Hospital lands. The inclusion of such indicative proposals has the potential to seriously undermine the ongoing maintenance, upgrade and if necessary expansion of the Hospital facilities to meet public health demands. Whilst it is accepted that the Coombe lands may remain within the SDRA 11 boundary to reflect future redevelopment potential in the event of relocation of the Hospital, any indicative layout proposals would be premature.

- E. Amend the SDRA 14 text in Chapter 13 as follows:

"The Hospital has identified the following programme of works over the course of the development plan: (i) Trinity St. James's Cancer Institute, (ii) Ambulatory Care Centre, (iii) long term potential relocation of the Coombe Women's and Infants Hospital (iv) critical care centre, and (v) acute mental health inpatient and community facility".

5.0 SUMMARY AND CONCLUSIONS

- 5.1 We respectfully request that this submission is taken into account in the consideration of material amendments to the Draft Development Plan.

Yours faithfully,

Robert Keran

Robert Keran
BSc Spatial Planning, BA (Law), LLB, MIPI
Virtus