



An Taisce – The National Trust for Ireland

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

14 September 2011

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| AN BORD PLEANÁLA | |
| TIME | 5:24 BY Hand |
| 14 SEP 2011 | |
| LTR-DATED | FROM CD |
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Re: RESPONSE TO REFERRAL FROM AN BORD PLEANALA OF PLANNING APPLICATION IN RESPECT OF STRATEGIC INFRASTRUCTURE DEVELOPMENT FOR NEW NATIONAL CHILDREN'S HOSPITAL AT MATER HOSPITAL, ECCLES STREET, DUBLIN 7

Dear Secretary,

Thank you for referral of the above. We wish to respond as follows.

Introduction

The proposed National Children's Hospital is in fundamental conflict with a range of provisions of the Dublin City Development Plan 2011-17, is seriously over-scaled, does not protect the city skyline, does not integrate satisfactorily into the urban fabric, is seriously damaging to the setting and integrity of Protected Structures and the classical Georgian planning in the area and would have severe adverse, overbearing impact on existing residential streets in the area and as such would be inconsistent with the proper planning and sustainable development of the area.

The site is inherently unsuitable for a new National Children's Hospital because of its constricted nature and is irreconcilable with the accommodation brief.

The scale, bulk and height of the proposed development, which would dominate the north-side Georgian city, materially contravenes the Development Plan and it should be rejected out of hand.

Tradition of major public building siting and design in Dublin

Major buildings in the city are traditionally sited and designed with the townscape as the starting point. Some examples include:

- City Hall, Cork Hill (1770s): A richly-detailed neo-classical building situated at the end of a long axial vista crossing the river Liffey leading towards Dublin Castle

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- Four Courts, Inns Quay (1790s): A grand-scale neo-classical building making full advantage of its location on a bend in the Liffey with a large drum and dome so as to dominate the river and be visible from both directions
- National Gallery Millenium Wing, Clare Street (2002): A sympathetic contemporary insertion into the Georgian streetscape leading to a dramatic full-height interior foyer
- Criminal Court, Parkgate Street (2009): Large drum-shaped building acting as visual ball-joint to the change of direction between the Phoenix Park avenue and Parkgate Street

In contrast the proposed National Children's Hospital does not respond to the townscape in any real way; it is simply a product of a requirement for a certain quantity of floor-space shaped into a building, the resulting mass of which the surrounding area and the general townscape is wholly incapable of accommodating in any satisfactory way and without serious adverse impacts. It is completely unacceptable that a major new building in Dublin should be designed and conceived on this basis.

Impact on townscape and 'Brusselisation'

In respect of impact on the townscape the proposal, with its long, sprawling, bulky form and its height is redolent of some of the more uncontrolled excesses of post-war European urban development. In Belgium, Brussels famously destroyed its historic centre over decades by giving free rein to commercial development with no scale or location criteria, with the resulting incoherent mix of large-scale modern development randomly overlaid on historic development and street patterns which makes up Brussels' character today, a process sometimes known as 'Brusselisation'.

The scale, design and relationship of the proposed National Children's Hospital to the surrounding area and townscape evokes the feelings of walking around central Brussels where unexpected abrupt transitions in scale and disaggregated built form are readily experienced.

Suffice to say, the impact of the proposal on the townscape of Dublin would be very great, and it should be noted in this regard that Dublin has been mooted for a UNESCO World Heritage Site designation for its Georgian core.

Impact on existing residential areas adjoining

There are extensive existing residential streets adjacent to the application site. These are zoned either Z1, "*To protect, provide and and improve residential amenities*" (Leo Street and adjoining streets; St. Joseph's Parade and adjoining streets; Inisfallen Parade and adjoining streets) or Z2, "*To protect and/or improve the amenities of residential conservation areas*" (Goldsmith Street and adjoining streets). Thus any new development at the Mater site must carefully integrate with these residential areas and ensure their amenities are protected as per the site zoning.

In view of its relative overwhelming scale and its close proximity the proposed building would constitute an overbearing, incongruous and visually obtrusive addition to the area which would have severe negative impact on the existing residential amenity of the area.

Conflict with provision of Dublin City Development Plan 2011-17

Transitional zones

The application site is within a transitional zone area. The south side of Eccles Street is lined with terraced Georgian houses of three- and four-storey scale which were constructed in the late 18th and early 19th century. These are Protected Structures and are located within the conservation-oriented Z8 zone, where the objective is "to protect the existing civic and architectural design character, to allow only for limited expansion consistent with the conservation objective".

The application site itself has Z15 zoning, which is "To provide for institutional, educational, recreational, community, green infrastructure & health uses"

Paragraph 15.9 of the Dublin City Development Plan 2011-17, which deals with transitional zones, is relevant in this regard. It states:

"While the zoning objectives and development control standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments which would be detrimental to the amenities of the more environmentally sensitive zone."

The Z8 zone in question with its long terrace of Georgian Protected Structures is the epitome of an environmentally sensitive zone and the proposed new building, rising to sixteen storeys, in Z15 would constitute an abrupt transition in scale with it and would be seriously detrimental to its amenities.

'Human scale'

Consistent and coherent building heights and 'human scale' are a defining feature of Dublin's inner-city streets, and the need to protect this quality is acknowledged in paragraph 16.1.4 of the Dublin City Development Plan 2011-17:

"The relationship of Dublin's street facades to the human scale is a major attraction of the city. It is a policy of Dublin city council that new buildings should be designed and sited with a view to maintaining this important characteristic."

On account of its scale, bulk and location directly adjoining inner-city streets the proposed building emphatically does not fulfil this requirement.

Conservation Areas

The western (Berkeley Road) enclosure of the application site and the western portion of its southern enclosure (Eccles Street) are within a Conservation Area. The Development Plan provides:

'Conservation areas have been designated in the city in recognition of their unique architectural character and important contribution to the heritage of the city, [and] require special care in terms of development proposals which affect structures in such areas, both protected and non-protected.'

'The special value of conservation areas lies in the architectural design and scale of these areas and is of sufficient importance to require special care in dealing with development proposals and works by the private and public sector alike.'

Dublin City Council will thus seek to ensure that development proposals within all conservation areas complement the character of the area, including the setting of protected structures, and comply with development standards.' (Section 7.2.5.3)

'It is the policy of Dublin City Council to protect and conserve the special interest and character of Architectural Conservation Areas and Conservation Areas in the development management process.' (Policy FC41)

Protected Structures

Eccles Street is an important north-Georgian street which forms part of planned vistas around the nearby historic landmark St. George's Church, Hardwicke Place (Protected Structure). The terraced Georgian houses lining the south side and part of the north side of the street, as well as the main mid-19th century classical stone hospital building on Eccles Street, are also Protected Structures. The Development Plan provides:

'It is the policy of Dublin City Council to protect these structures, their curtilage and the setting from any works that would cause loss or damage to their special character.' (Policy FC30)

On account of its overwhelming scale and bulk the proposed development is in serious conflict with the provision for Conservation Areas and Protected Structures. In particular, the applicant's drawings and architectural scale model show that it would have severe emasculating effect on the superb Francis Johnson-designed St. George's Church, an outstanding and important landmark Georgian church spire of the north inner city.

City skyline

In relation to the city skyline, the Development Plan provides the following:

"To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and site principles set out in the Development Standards Section (see Chapter 17). In particular all new proposals must demonstrate sensitivity to the historic city centre, the river Liffey and Quays, Trinity College, The cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance" (Policy SC18)

The proposed building would constitute a monstrous intrusion on the historic inner-city skyline and on account of its long sprawling form and its height would not make a positive contribution to the urban character of the city or be sensitive to the historic city centre.

High building provision

While Phibsborough is designated in the Development Plan as an area for "mid rise" buildings (paragraph 17.6.1), the proposed development is in conflict with the 'Assessment Criteria for High Buildings' (see below)

Assesment criteria for high buildings

The 'Assessment Criteria for High Buildings' contained in paragraph 17.6.3 of the Development Plan stipulates that high building proposals in the city must "Protect important views, landmarks, prospects, roofscapes and vistas" (bullet point five). As seen in the applicant's photomontages, the upper section of the proposed building would be clearly visible from, and would encroach significantly into, the northern vista along O'Connell Street, the city's most important street. It would also appear above Belvedere

House which terminates the view along North Great George's Street, a north-Georgian city street of considerable importance, as well as intrusively impacting on a range of other city views. The proposal is thus in conflict with paragraph 17.6.3.

The criteria further requires that such buildings "*Consider the impact on protected structures, conservation areas, and the architectural character and setting of existing buildings, streets, and spaces of artistic, civic and historic importance, in particular, the building's relationship with the historic city centre*" (bullet point thirteen). As already articulated the impacts of the proposed building on the architectural heritage of the city and its historic setting would be severe and adverse.

Conclusion

On account of its scale, bulk, prominence and design the proposed development would constitute a dominant, overbearing and incongruous building in the north inner city whose impact on the adjoining residential areas and the townscape would be drastic and unprecedented. The proposal is fundamentally unsuited to city-centre location, would severely adversely impact on the city's architectural heritage and skyline, and is in serious conflict and contravention with the Dublin City Development Plan 2011-17. As such the proposed development would be contrary to the proper planning and development of the area and should be refused permission.

Yours sincerely,


Kevin Duff,
Dublin City Association Planning sub-Committee

Encl. Appendix 1 – Additional Comments (Transport and Sustainability Issues)

APPENDIX 1 - Additional Comments (Transport and Sustainability Issues)

Proposed National Children's Hospital

This submission asks the Board to satisfy itself on given questions and if the Board cannot so satisfy itself, to decline permission. Only limited aspects of the planning and transport implications of the proposed development are covered due to resource constraints of environmental organisations. Four areas are covered here:

- Long term use of vacated buildings
- Transport
- EU Law on air pollution
- Sustainability enhancement

Long term use of vacated buildings

In specific terms, what is the long-term use of the buildings which would be vacated by the opening of a new hospital at the proposed site? We note recent significant investment, particularly at Crumlin, where seven new state-of-the-art theatres have been provided including two cardiac theatres and two laser treatment theatres.

The facilities are described as "bright, modern, highly-equipped" with child-friendly surroundings. A new day unit has also been built with a child-friendly pre-operative play area. In 2007/08 alone the following were added to Crumlin:

- New Haematology/ Oncology Day Unit
- New Gardens for the National Children's Burns Unit
- Extension to Our Lady's Hospital Special School
- New Cardiology Out patient Centre
- Children's Transition Care Unit
- Extension to Diabetes & Endocrine Centre
- Extension to the National Centre of Medical Genetics
- Extension to the Children's Diabetes & Endocrine Centre (see <http://www.olhsc.ie/AboutUs/>)

What is the long term use of these facilities, and not just those described above with respect to Crumlin, but regarding all the hospitals where services would be diminished?

Transport

A review of chapter 13 of the application shows that approximately 10,000 journeys are expected to be made to / from the proposed hospital every day. This breaks down as follows:

- 3,000 staff or work-related trips,
- Approx 3,000 trips related to patient care sub-divided between in-patients (628), out-patient (1,676), A&E (442) and day care (182), and
- 4,000 diverse journeys, including some back-and-forth trips by patients and their parents, staff leaving and returning for lunch, additional visitors to patients, hospital servicing and deliveries.

Staff

The planning applicant assumes that 87% of staff travelling to work at the proposed hospital will not need parking at the facility, or in its vicinity, largely due to expense of parking, coupled with anticipated rises in cycling, walking, and public transport use. In other words, therefore, approx 1,580 of a total of around 1,800 staff members on-site at any one time will not require parking. This split, namely 87% for low-polluting sustainable modes (of bus, car-share, cycle, rail, walk and taxi) with 13% requiring car-parking, is extremely ambitious.

At 87% the sustainable travel figure is significantly higher (17%) than the current top-performing hospital in the area, the Mater, where 70% travel by sustainable modes.

The challenge here is immense. Essentially the developer's position is that constraints on parking spaces and the expense of parking will raise sustainable travel to 87%:

it is proposed to provide only limited on-site parking for staff, with just 13% of the peak staff population being provided with a space on-site. The only options for staff then are to pay full price for parking on-site, to park on-street or in an unrelated private car park, at hourly market costs, or to use other modes of transport. The cost of on and off-street parking in Dublin City Centre is considered such as to render such daily parking prohibitive thus encouraging staff to travel by means other than private car. In this regard it is expected that the staff modal split figure for the site will be 13%.

As a result 236 of the total 972 in car-parking spaces are reserved for staff in the proposed new hospital. A mobility management plan (MMP) also forms part of the planning application (completed by O'Connor Sutton Cronin (OCSC) on behalf of the developer).

However, we have not found in the mobility management plan or in the application itself how it is actually proposed to manage parking spaces in practice. Please note that we are not suggesting that some staff will park in spaces reserved for patients / visitors but that there must be a system in place to regulate the division of spaces as is proposed. Therefore, in the event that staff members were to park in spaces allocated for patients and their families what are the consequences? How would a re-occurrence be prevented?

Patients / Visitors

Turning to patients / visitors, broadly similar assumptions are made with the result that only somewhere in the region of 15 – 20% of patients/visitors will park at the hospital itself.

The developer concedes that of the 7,000 patient/visitor journeys around half, or 3,500, will have demand to travel by car, but that the number of parking spaces will be limited to 736.

Clearly, a great deal depends on the length of stay. How long does the average patient spend at the hospital, and what is the duration of the average visit? What is the average turnover time at parking spaces regarding the existing hospitals? Critically, does visitor/patient attendance at hospital peak at given periods of the day? In regard to these questions, data could be furnished by the developer in order to assess the application, and we suggest the Board secures further information in order better to assess the application.

Until this data is produced, all that can be deduced is that, over the course of the day the number of spaces available will be equal to 21% (736) of those who have demand to park on site for a given time period over the course of the day (3,500). Note that this is not to say that 2,750 patients/visitors will have to make use of on-street parking – as above, the profile of parking turnover would be required to undertake this investigation. In turn, the 736 figure relies on staff not parking in spaces intended for patients/visitors.

Against the backdrop of reasons of space, price, or a combination of both, the developer reasons as follows:

There is no reason to assume visitors will uniformly elect to drive to the site and their modes of travel are likely to be close to the local modal share (see chapter 13).

However, this statement is not supported by reference or further reasoning. Here, the developer is comparing how persons ordinarily make a planned journey to the Temple St / Eccles St area with how one will make the journey visiting or bringing a sick child in hospital. These two scenarios do not seem comparable.

As well as the issues above, An Bord Pleanála may also wish to investigate the issue of allocating the 736 spaces among patients/visitors. Clearly, there is a case to prioritise or preserve their use primarily for A&E patients. The application notes 442 journeys associated with A&E. How it is proposed to handle this issue and what protocols are in place elsewhere pointing us to best practice?

EU Law on air pollution

Under EU Directives on air quality, traffic pollution cannot be increased in the vicinity of the proposed Childrens' Hospital as to do so would constitute a plan to breach EU law, which is in and of itself illegal. Hence, if the view of An Bord Pleanála is that such traffic will increase, it is legally proscribed from granting permission.

Ireland must meet air quality requirements under what is known as the European "CAFE Directive" (European Parliament and Council, 2008), a piece of legislation which synchronised a large part of the existing legislation on air quality (EIONET, 2008).

However, as its 2010 report shows, the EPA is unable to say that air pollution levels in Dublin city centre for nitrogen dioxide (NO₂) are within the EU limit level (EPA 2010).

The EPA also acknowledges that increases in nitrate oxide (NO_x) emissions in central Dublin will further breach limit values which are set to come into force.

A recent study at Trinity College Dublin showed that concentrations of indoor air pollutants tend to be much higher than those outdoors (Challoner and Gill 2011), further underlining the need to stay within EU limits.

Hence, Dublin is already in breach of a number of air quality limits, or is unable to show it is in compliance. Unless An Bord Pleanála plan to breach EU law - an illegal act in itself - it is not permissible to give consent to an application which would increase nitrogen dioxide levels.

Sustainability enhancement

We suggest a number of improvements to enhance the share of hospital travel held by the sustainable modes. In broad terms, these break into three categories:

- Vicinity enhancements (shorter traffic light sequences)
- Improvements with regard to the no. 120/122 bus services
- An altered bus service that serves demand between Heuston Station on the one hand and Dorset St / Drumcondra on the other (see further below)

The pedestrian light sequence at the crossroads where Dorset St meets Eccles St and Temple St is extremely poor. Here, pedestrians are currently left waiting more than 150 seconds (2.5 mins) which is not acceptable. More frequent changes in lights are needed. Pedestrian provision at the junctions where Dorset St meets North Circular Rd and Gardiner St are also poor, and again, not acceptable. There is no pedestrian facility to cross east-west on the city side of these junctions. Proper pedestrian provision is needed in both cases with frequent light changes.

Serving Tallaght and Crumlin

Some staff from Crumlin and Tallaght will relocate to the proposed hospital. As we understand it, the existing 120 and 122 buses link Drimnagh to Cabra, serving Crumlin, Holles St, the Rotunda, and Temple St / the Mater en route. In the event permission is granted, An Bord Pleanála can insist that this service begin at the Red Cow Park and Ride, where it would pick up passengers from Tallaght, as well as car borne visitors/patients.

Connolly Station

It is an approx 20 min walk to Connolly Station. The two main buses linking to Connolly are the 33 and 41. However, there is a walk in both instances, and this underlines the need for the pedestrian enhancements described above.

Heuston Station

For Heuston Station the idea of a shuttle bus is floated by the developer. However, for the spend involved this does not make sense. Rather than a shuttle, a new or reformed bus route should be provided linking Heuston Station to the Dorset St / Drumcondra Rd corridor. Merger of two existing routes to serve this journey matrix should be considered. For example, an existing bus route coming in from West Dublin could be routed along Church St, North King St and Dorset St, combined with an existing service on the Drumcondra corridor.

Indeed, there are already major demand centres on this corridor which are not linked by public transport to the main rail terminus serving the south and west: these include DIT

Bolton St, the hospitals at Eccles St/Temple St, St Patrick's College, Croke Park, and further north, Beaumont Hospital.

A condition can be included in the planning permission that the new hospital is not permitted to begin seeing patients until such time as this service is provided (similar to the condition imposed regarding the Adamstown development). Moreover, further information requests can be relied upon by the Board to create momentum in this regard.

References

Challoner, A and Gill, L (2011), "Indoor/outdoor air quality relationship in urban commercial buildings: Dublin case studies" Proceedings of the Irish Transport Research Network annual conference.

EIONET (Reporting Obligations Database) (2008) "Legislative Instrument Detail: CAFE Directive", viewed 9 August 2011, <http://rod.eionet.europa.eu/instruments/633>

Environmental Protection Agency (EPA) (2010) "Review of Ambient Air Quality Monitoring in Ireland", viewed 9 August 2011, <http://www.epa.ie/downloads/pubs/air/quality/ReviewOfAirQualityMonitoring2010NoFinancialInfo.pdf>



