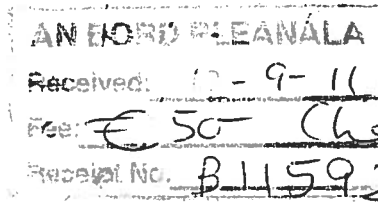


The Secretary
 An Bord Pleanála
 64 Marlborough Street
 Dublin 1



Monday, 12th September 2011
 [By Hand]

Dear Sir

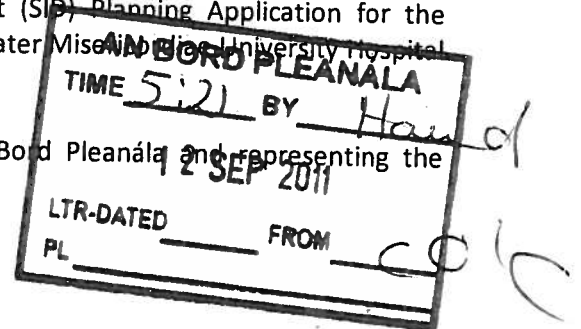
RE: PROPOSED CHILDREN'S HOSPITAL OF IRELAND: STRATEGIC INFRASTRUCTURE DEVELOPMENT PLANNING APPLICATION (ABP REF. NO. PL29N.PA0024)

1.0 INTRODUCTION

1.1 Observation on Behalf of Mater Private Hospital

Mater Private Hospital¹ (MPH) wishes to make an Observation in relation to the abovementioned Strategic Infrastructure Development (SID) Planning Application for the proposed Children's Hospital of Ireland (CHoI) on the Mater Misericordiae University Hospital Campus at Eccles Street, Dublin 7.

We enclose a cheque for €50, made payable to An Bord Pleanála and representing the appropriate Fee with this Observation.



2.0 OBSERVATION

2.1 MPH Supports the Children's Hospital in Principle, Subject to Agreed Mitigation Measures

At the outset, it should be noted that Mater Private Hospital fully supports the principle of developing a National Paediatric Hospital on the Mater Campus. All issues expressed in this Observation relate to the detail of the proposed development, and these issues can, we submit, be successfully mitigated.

The proposed Children's Hospital will be a welcome addition to the Mater Campus and will strengthen the world-class healthcare hub that has emerged in the North Inner City, offering the potential to enhance synergies and co-operation between the various constituent healthcare facilities.

2.2 MPH has Engaged with the Applicant in Seeking Agreement; Some Residual Issues Remain

MPH has had a significant level of engagement with the Applicant (NPHDB), both prior to and following lodgement of the CHoI Planning Application, in order to avoid what otherwise

¹ No. 73 Eccles Street, Dublin 7.



could be unacceptable significant negative impacts on the operation of the Mater Private Hospital.

Whilst much work has been done in this regard, and some items have been agreed, there are issues to resolve between the parties in respect of, *inter alia*:

- Airborne and groundborne Noise.
- Vibration.
- Settlement and ground movements.
- Traffic impacts.
- Dust minimisation and cleaning proposals.
- Relocation of the PET/CT facility which the Mater Private Hospital jointly operates with the Mater Misericordiae University Hospital, and which the Applicant is proposing to demolish.

2.3 MPH Comments on Elements of O'Connor Sutton Cronin Report Relating to Mater Private Hospital (Volume 1)

Enclosed in Volume 1 of the Planning Application documentation is a Report prepared by O'Connor Sutton Cronin Consulting Engineers, entitled 'Impact Assessment of Basement Construction for the Children's Hospital of Ireland on the Mater Private Hospital' ('the OCSC Report').

Whilst MPH has reached agreement in principle with NPHDB on some mitigation measures and monitoring proposals, it must be noted that this Report as a complete body of work has not been agreed to or signed off by MPH. There are a number of elements in the Report that MPH do not accept including, *inter alia*, settlement mitigation measures in Section 9 relating to Linear Accelerators and the assessment of MPH's construction joints in Appendix H.

The Peer Review process undertaken in advance of the lodgement of this Application concluded that the Linear Accelerators at MPH would not be adversely affected as a consequence of the CHol construction works. Adverse construction impacts to the linear accelerators at MPH are unacceptable. This has been a particular focus of prior engagement between the parties. However, no mitigation measures for the possible eventuality of negative impacts from the construction on the linear accelerators have been agreed with CHol, and the measures set out in section 9 of the OCSC Report are absolutely unacceptable to the MPH, as they would result in severe impact on MPH services.

MPH has proceeded on this basis (i.e. that zero negative impact will occur) and advise the Board that adverse construction impacts to the bunkers are unacceptable.

With respect to Appendix H and in particular the assessment of Construction Joint C, the Mater Private Hospital refutes the suggestion that the anchors supporting the floor slab 'are currently over-utilised (failing)'. There is no justifiable basis for this statement. MPH's engineering advisors have confirmed that the construction joints of the Mater Private Hospital have performed satisfactorily to date and will continue to do so unless adversely affected by external works, such as those proposed by the CHol. Discussions with the Applicant are ongoing in this regard.

AN BORD PLEANALA
TIME BY
12 SEP 2011
LTR-DATED _____ FROM _____
PL _____



3.0 CONCLUSION

3.1 MPH is Attempting to Resolve Outstanding Issues with NHPDB

MPH is continuing to engage with NPHDB with the intention of agreeing appropriate mitigation measures for their areas of concern, and it is hoped that an agreement can be reached in the near future.

I would appreciate if you could keep us informed on the progress of this SID Planning Application. MPH looks forward to participating in the forthcoming Oral Hearing.

Yours faithfully

Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.

