

An Bord Pleanála  
(The Board)  
64 Marlborough Street  
Dublin 1

Tuesday, 13<sup>th</sup> September 2011

Dear Sir, or Madam,

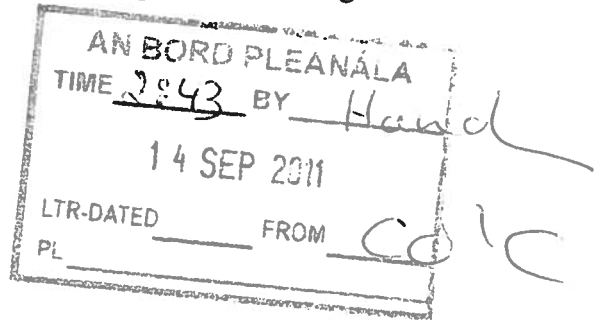
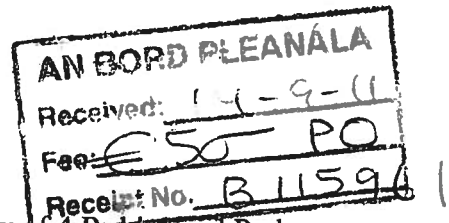
**Re: Direct Planning Application to An Bord Pleanála in respect of a strategic infrastructure Development Dublin City Council for the construction of The Children's Hospital of Ireland at the development site, known as Mater Misericordiae University Campus Eccles Street, Dublin 7.**

**1.0 Introduction**

This submission has been prepared on behalf of Robert Foley of 4 Robinhood Park, Robinhood Dublin 22, by Robert M Foley & Associates of 4 Robinhood Park, Robinhood, Dublin 22. We wish to make an observation on the above mentioned planning application submitted by O'Connell Mahon + NBBJ Architects in July 2011 to An Bord Pleanála address to which correspondence relating to the Planning application should be sent.

Robert M Foley & Associates  
4 Robinhood Park  
Robinhood  
Dublin 22

We enclose a cheque for the sum of €50-00 euro, please forward a receipt for same at the earliest possible date.



## **1.1 Proposed Development**

The Children's Hospital of Ireland hospital building will comprise some 88,797 square metres (sq.m) above ground level (at Eccles Street). The gross floor space of the building will be 108,365sq.m. with an additional 35,590 sq.m. provided for the underground parking of vehicles. The building height above street level (at Eccles Street) will vary from four storeys in the building block fronting onto Eccles Street to sixteen storeys (sixteen storeys plus a level of plant rooms), all over five basement levels (at Eccles Street). The building height will be 94.49 metres Ordnance Datum or approximately 73.89 metres at its highest point above the street level at the Entrance Forecourt on Eccles Street (the OD in the centre of Eccles Street opposite the entrance is 20.6 metres).

## **2.0 Ground for Submission.**

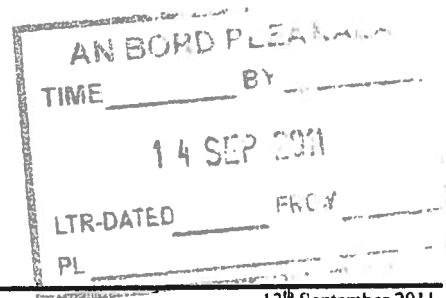
### **2.1 Zoning and Conservation Designation**

The subject site is zoned Z15, to provide for institutional, educational, recreational, community, green infrastructure, and health uses.

The development Plan states that Z15 areas are areas which zoned for educational, recreational, community and health uses and for existing uses which are unlikely to change in the future.

#### **KDC No 7 Phibsborough**

The 2011 City Development Plan states that the Key District Centres, Represent the top-tier of urban centres outside the city centre, a number of which form part of the large KDA each of the eight KDC's formally prime urban centres underpin a wider area and act as strong spatial hubs providing a comprehensive range of commercial and community services to the surrounding populations. All of the KDC's closely align to public transport rail corridors, with the exception of two (Finglas and North side) which perform an important regeneration role for local communities.



LAP Phindborough/ Mount Joy Local area Plan 2008 states.

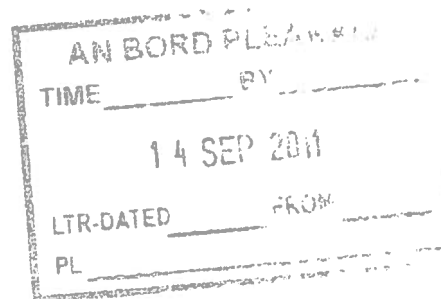
- To ensure that height and massing do not impact negatively on protected structures, and the social and historic heritage of the area.
- To ensure that high buildings create a visually and architecturally coherent and attractive contribution to the skyline, in terms of slenderness ratio and height.
- To protect and frame important view and vistas, and to ensure proposals for high buildings will have no negative local or city-wide impacts.

The subject site zoned Z15, is located in one of the most important conservation areas of Dublin City with regard to their unique contribution and importance to the heritage of the city of Dublin. The development Plans states that 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. Thus the plan will seek to ensure that development proposals within all conservation areas complement the character of the area.

#### Development and Plan states

Residential conservation areas have extensive groupings of buildings and associated open spaces with an attractive quality of architectural design and scale. The overall quality of the area in design and layout terms is such that it requires special care in dealing with development proposals which affect structures in such areas, both protected and non protected.

It is our opinion that the subject site is completely unsuitable for the scale, form, location, and type of development proposed in this application to An Bord Pleanála, and is contrary to proper planning and sustainable development of the area.



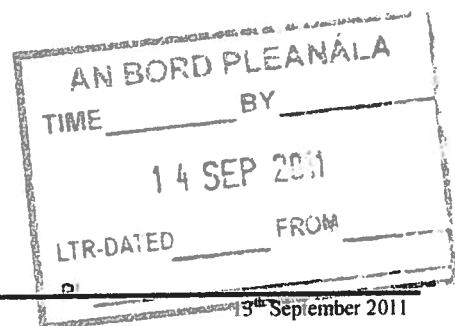
### 3.0 Scale, Height, and Form.

One of our principle objections to the scheme is the proposed height, scale, and form, of the development, particularly having regard to the surrounding low rise residential heights in the vicinity of the subject site. In our opinion, little cognisance of the surrounding heights and house types, streetscape has been take into account in this very high development, consisting of 4 stories below ground level, and 16 stories above ground level, and an additional level for the plant room (17 stories over finished ground level).

The proposed development will have a negative affect on both the amenities and architectural quality and setting of the area, and is contrary to proper planning and sustainable development of the area.

Due to the proposed heights of the subject building the existing houses and buildings in close proximity to this development will be subjected to shadow's cast by the proposed building leaving house and streets in shadow for a number of hours everyday, this will also affect the quality of light into the existing houses, and other buildings.

In our professional opinion the scheme is over scaled given the surrounding building heights in the area. The nature of the development means that the provision of roof gardens to try to meet open space requirements (due to a lack of available site area for use as parkland and planted spaces). A combination of height and roof gardens, and balconies will ensure overlooking into the adjoining homes and gardens of the residents. This will represent an unacceptable level of overlooking and thus the proposed development will provide an "undue adverse impact on the amenities of existing houses and other buildings".



#### **4.0 Building Design and Fire or Explosion.**

The proposed development of 16 stories over ground level, and a plant room on the level 17 as stated above. The issue of a high rise building of this nature, which will be home to the children of this country, who are sick or in need of medical attention. It is our opinion that due to the height of the building with wards at the 16<sup>th</sup> floor level. If an accidental fire, or explosion occurs in this proposed development, the documents enclosed with this application to An Bord Pleanála do not indicate how the building would be evacuated in the event of a fire or explosion. Indeed Dublin City Council Fire department have a turntable ladder that will reach 5 storeys only, the Fire Department will not be capable of dealing with a major evacuation of the proposed building in the event of a serious fire event, or an explosion event.

In this regard a lower height building would be a better alternative, but the site is not of sufficient size to facilitate a lower scale type development.

We ask An Bord Pleanála to give very serious consideration to this point, because due to the complexity of the proposed development, and the 16 stories in height, and the use of the building to care and treat young children. In the event of an emergency, and regardless of how well the building is designed or constructed, this building due to its height and complexity could not be totally evacuated. This point is a major concern to this practice, and it is a point which should be considered in great detail by An Bord Pleanála.

#### **5.0 Car Parking**

The development of this site proposes 972 car parking spaces, and 243 bicycle spaces. Transport 21 details, with regard to the Metro North Route has been included in this application with a station located in Dorset Street. The Masterplan for this development relies on the provision of the Metro Route and a station for same in Dorset Street.

The proposed Metro North Route may never be constructed and there is no station in Dorset Street at the time of lodging this application to An Bord Pleanála. Indeed in the Ireland of today the country does not have money for basic services, and a major project like Metro North Route will require Billions of euros, which the government does not have.

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## 5.0 Car Parking Continued

So the logic is if there is no Metro North Route, parents taking their sick children have to travel by ambulance, car, taxi, or bus to the proposed new Children's Hospital. The on street car parking on Eccles Street will be required for the existing houses and business on Eccles Street. This development will require staff car parking, parent car parking with children, and visitor car parking, and delivery vehicles and service vehicles, along with the all important ambulance vehicles.

We also note that the new adult hospital traffic will share the same entrance ramp to the Children's Hospital. The concern in this regard is that a major amount of Hospital traffic is to enter Eccles Street which was designed and built for horses and carts. The traffic volume with this development will increase dramatically in the area of the proposed site on all roads, which are already jammed with traffic at all times of the day.

This practice would have major concern with the large increase in traffic volumes in this general area, and the effect on the existing Georgian street, and buildings. The position of the ramp into the car park will cause traffic build up on Dorset Street.

In our opinion the total no of car parking spaces for this development is under estimated with patients driving from all four corners of the country, staff, visitors service people, and delivery people the minimum car parking for this scale of development is circa 2500 minimum. This site does not appear to have that type of capacity.

## 6.0 Access to Site

The proposed development has been designed with the intent of provided a modern and efficient state of the art medical care facility for the children of Ireland. The families embarking on the journey to this efficient state of the art facility will be travelling from all four corners of the country in the main by car. The first point of contact with Dublin City Road network may for most people be the M50 motorway. An example might be a family with a sick child set off from Killarney, they have a three hour journey to the Red Cow intersection of the M50 motorway. Depending on the route they select to Eccles Street, they may choose the M50 to Santry, or they may choose the route through the city to Eccles Street, whichever route is taken, and depending on time of travel this could take a further hour or more before they are in the car park of the proposed development.

The proposed site in Eccles Street is a difficult site in the city of Dublin to locate, as it is situated north of the Liffey and circa 3/4 mile from O' Connell Street. Parents travelling from difficult parts of the country with no knowledge of Dublin City will find it extremely difficult to find and locate the proposed site.

Robert M Foley & Associates

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Indeed when consideration is given to the Eccles Street back two hundred years ago the North Circular Road marked the outer limits of the city of Dublin at that time. Today the outer limits of the city is the M50, and beyond.

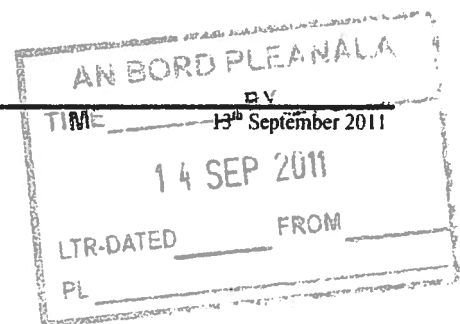
With the proposed development generating up to circa 4000 additional car and vehicle journey a day into an area of the city with an old mainly narrow street network this in the opinion of this practice will lead to total grid lock on both ends of Eccles Street, Dorset Street, and North Circular Road. Which may also cause emergency ambulances to be delayed going to, or returning from an emergency. This is not the design intention of a development of this size and nature, but this could be the reality if the development is built on the Eccles Street site.

### **7.0 Helicopter Landing Pad**

The Planning documents as lodged with An Bord Pleanála has not made any provision for any construction of a Helicopter landing pad on the roof of the new building, or on the ground level in the development site.

This provision for the landing pad must be a priority in a development of this type and size, but when the facilities in the new building are dedicated to the medical care of children from all parts of the country, who may not have four or five hours to get to this proposed hospital. Transfer by a helicopter may be the only way for the child or children to receive urgent medical care. The air ambulance service for organ transplant would also need a helicopter pad.

This practice is at a loss to understand why the proposed design does not have a Helicopter Landing pad included in this application. An Bord Pleanála's attention should be alerted to this essential piece of overall hospital development which appears to be missing, or not considered by the design team.

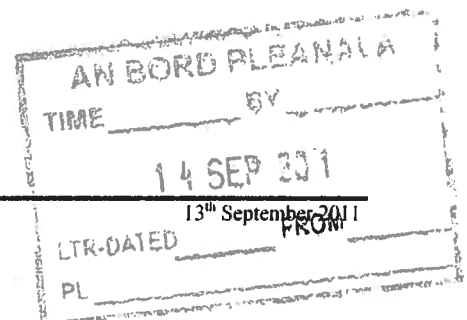


## 8.0 Construction Impact

The impact of construction traffic on the streets in this location, like Eccles Street, which was designed and built circa 200 years, ago for horse and carts. The streets of this part of Dublin City are not suitable for large trucks with heavy steel or concrete loads moving to and from the site at regular intervals. The issue of every building along Eccles Street which is a protected structure being damaged by the constant movement and vibration of heavy trucks.

Damage to road surfaces and pavements, and the almost definite damage to the basement areas, of all the houses on Eccles Street, Leo Street that have basements areas which extend out under the road in most cases. Damage to the basement of similar old Georgian buildings is evident in Henrietta Street, which is close to the proposed site.

The location of the main site entrance in Eccles Street to Dorset Street will in the opinion of this practice cause major traffic disruption during the construction phase and then during the normal hospital use of the proposed development.



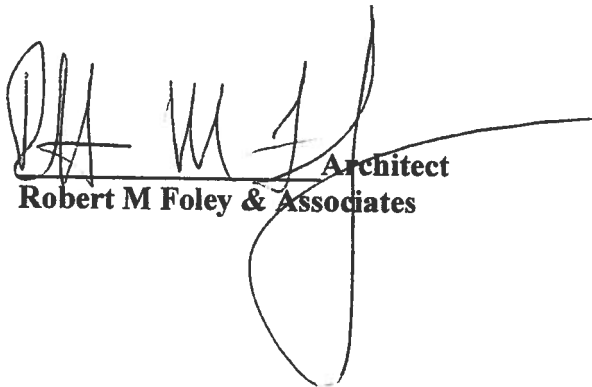


**Conclusion**

In conclusion and for all the reasons, arguments, and considerations noted above we are of the opinion that the proposed development of the National Children's Hospital of Ireland, on the subject site at Eccles Street Dublin, should be refused planning permission by An Bord Pleanála. We trust that issues raised above will be addressed by An Bord Pleanála in their assessment of the proposal, in order to adequately protect the amenity and heritage of the existing buildings in and around the subject site and to ensure adherence with the principles of proper planning and sustainable development.

When the development started on Eccles Street back 200 years ago that site was close to the then Circular Road, now known as the North Circular Road. Which was the outer boundaries of Dublin City in the year 1800. Now with the expansion of Dublin City the M50 Motorway in the year 2011 is the outer boundary of Dublin City. The proposed Development of this nature, size, and scale, should be a land mark building on the outer fringe of Dublin City located on or close to the families of this country regardless of their location, in the city or in the country, and situated on one of the many green field sites suitable for this type of development along the line of the M50 motorway.

Yours Sincerely

  
Architect  
Robert M Foley & Associates

Robert M Foley & Associates

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