

Proposed Curraheen Healthcare Campus

Submission to the Draft Cork City Development Plan

on behalf of Curraheen European Healthcare Ltd

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1. Introduction

This submission is made on behalf of Curraheen European Healthcare Ltd. who have an interest in the lands at Curraheen which adjoin the Marymount University Hospital and Hospice to the west and south (see Fig 1). The purpose of this submission is to seek an adjustment of the boundary of the City Hinterland at Curraheen to provide a more appropriate zoning objective for the Marymount campus and make provision on some of the adjoining lands for the new healthcare and ancillary facilities which are likely to be required in this area during the period of the next City Plan.

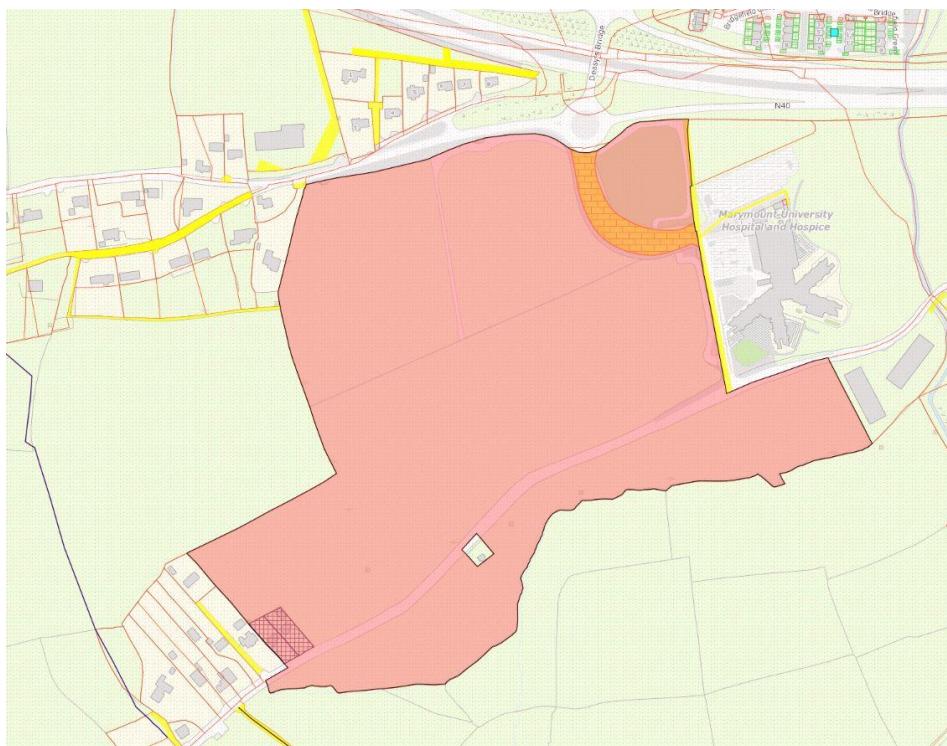


Fig 1 Property register map showing the land available for rezoning

Prior to May 2019 the eastern boundary of the Marymount campus formed the administrative boundary between Cork City and County. The recent extension of the jurisdiction of the City Council provided the opportunity to review the current boundary between the Metropolitan Green Belt and the development zones within the City environs. However, no change to the development boundary at Curraheen has been made in the Draft City Plan (see Fig 2) and it is currently proposed that the established Marymount campus and adjoining lands will be zoned "ZO 21 City Hinterland" where the planning objective is:

To protect and improve rural amenity and provide for the development of agriculture.

In our opinion, this is not an appropriate zoning objective for a major regional healthcare facility as it does not adequately provide for alterations and extensions to the existing campus or for the possible future co-location of some of the healthcare and ancillary facilities which are likely to be required at Curraheen for the expanding and ageing population of the Cork Metropolitan Area.



Fig 2 Draft zoning map for Curraheen

The proposed amendments to the Draft City Plan will provide a further opportunity to adjust the boundary between the former Green Belt and the adjoining development zones to reflect the established pattern of development and to make provision for further sustainable development. The purpose of this submission is to request amendment of the development zones at Curraheen to acknowledge the strategic importance of the Marymount campus and to make provision for further healthcare and ancillary uses.

2. Draft Policy Objectives for Healthcare

The general policy objectives in the written statement of the draft City Plan provide significant support for the future development of the healthcare sector. For example, Section 3.76 of the Draft City Plan requires that land use objectives should support the healthcare system, including the delivery of infrastructure in-step with new development:

"The importance of health in our everyday lives has been magnified by the Covid-19 pandemic and it has also made us appreciate more than ever that our health is not solely contingent on the healthcare system but also a range of other factors. This Development Plan recognises and proactively addresses some of these factors and land use considerations including objectives which seek to support our healthcare system, achieve liveable neighbourhoods, protect and enhance green and blue infrastructure, support recreation and community facilities, deliver infrastructure in-step

with new development and reduce greenhouse gas emissions and pollution. As such Health is a cross cutting theme that informs all elements of this Plan."

Section 3.80 supports the redevelopment and expansion of existing healthcare facilities in the City:

"In addition to the strategic new development proposals, there are also likely to be requirements to expand and undertake development works to existing healthcare facilities in the City. Subject to compliance with other policy objectives contained in the Development Plan, these proposals will be supported in principle."

The following general policy objectives in regard to the development of hospitals and other healthcare facilities are therefore proposed in the written statement:

Objective 3.26 – Healthcare Infrastructure:

"To support the sustainable provision and expansion of hospitals and other healthcare facilities within the city including the provision of primary care centres and other specialist facilities at suitable locations, subject to the proper planning and sustainable development considerations."

Objective 3.27 – Sustainable Transport for Hospitals and Healthcare Facilities

"To support the preparation and implementation of sustainable travel plans at hospitals and major healthcare facilities to reduce on-site parking, congestion and associated amenity impacts."

However, these general objectives will not be achieved unless they are reinforced by corresponding mapped objectives at the locations, such as Curraheen, where future development of hospitals and healthcare facilities is likely to be required within the period of the next City Plan.

3. Draft Zoning Objectives for Healthcare Uses

There are two zoning objectives in the Draft City Plan which make specific provision for healthcare facilities:

Zoning objective ZO 6 – Sustainable Residential Neighbourhoods,

Provides for a range of facilities likely to be required at the level of the residential neighbourhood, including education and healthcare institutions and facilities and other primary uses i.e. retail, residential uses, community uses, offices, hotels, cultural and leisure facilities. While a university hospital and hospice is a healthcare institution, it is not be the type of facility that it most efficiently provided at the neighbourhood or district level.

Zoning objective ZO 14 – Institutions and Community:

Provides for healthcare facilities which are delivered at the regional rather than the neighbourhood level. This is a more appropriate zoning objective for the existing Marymount campus and for the further healthcare facilities which may be required on the adjoining lands.

This range of uses covered by the ZO 14 objective is clarified in the following excerpts from the written statement of the Draft City Plan:

Paragraph ZO 14.1:

"This zone generally applies to large educational, healthcare and other institutions and community facilities. These are generally locally or nationally important, long-established uses with a variety of characteristics and built forms, and they play an important role in providing key strategic services for communities across the City and often much further afield."

Paragraph ZO 14.2:

"This zone seeks to protect these uses and facilitate their appropriate, sustainable development. Primary uses include healthcare, education, civic, cultural and other major community uses."

Paragraph ZO 14.3:

"Uses that are ancillary to the primary institutional and community uses may be open for consideration at an appropriate scale, subject to local considerations and where they are subsidiary to the primary uses and do not conflict with the purpose of the zoning objective. These ancillary uses could include sports grounds and facilities, residential accommodation, office based administrative uses, support services, car parking subject to mobility objectives, childcare facilities and small-scale local services that serve the local need of the primary institution or community use."

Paragraph ZO 14.4:

"Development proposals in this zone must provide high-quality built and landscaped environments that have regard to the local receiving environment. Institutions and facilities in this zone would benefit from a masterplan-led approach to developing their lands and facilities and are encouraged to engage with Cork City Council in this regard."

Paragraph ZO 14.5:

"In many cases these lands and facilities are located in suburban areas and / or adjacent to residential uses. Development in this zone, particularly where adjacent to residential uses, shall have regard to impacts on residential amenities. However, some uses such as hospitals have specific operational requirements and realities, for example out of hours traffic movements and sirens from emergency vehicles, and where these uses are considered essential their functional operation will be supported."

In our opinion ZO 14 is the most appropriate zoning objective for the established Marymount healthcare campus at Curraheen as it would reflect the fact that a university hospital and hospice provides healthcare services at a Metropolitan scale. The extent of the area to be rezoned should also have regard to:

- (a) the planned growth in the population of the Cork Metropolitan Area;
- (b) the range and complexity of the healthcare services which will be required for a population which is growing and ageing at the same time; and;
- (c) the need for make provision for co-location with other healthcare and ancillary services, which may be required in the future,

These opportunities for co-location with the established Marymount campus may include care homes for the ageing population and short-term residential accommodation for patients attending early appointments or requiring daylong treatments or procedures. Accommodation may also be required for friends or family members of patients who wish to be within easy reach of the campus.

4. The Demand for Residential Care Homes

The Core Strategy of the Draft City Plan highlights the extent of the challenge posed by the increase in the population of the Cork Metropolitan Area which will be required to achieve the targets in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). In the healthcare sector there will be additional development pressure due to the fact that the population structure will be ageing while the overall population increases.

The projected number of older people in Ireland over 65 years of age is expected to grow by c. 60% by 2030. This is a major challenge for the healthcare sector in general and particularly for residential care for dementia. Demand for nursing homes beds is a function of the age of the population in that catchment. When assessing demand, the standard rule of thumb has been that c. 4.5% of the population over the age of 65 will require a nursing home bed¹. This is likely to be an underestimate, as the need for long term care increases with age. For example, 8.4% of older persons between the ages of 80 and 84 years will require long term care, rising to 22.3% of older persons over 85 years².

In 2016, the population Cork City and County aged over 65 years was 54,116. This would indicate, using the 4.5% 'rule of thumb', a demand for c. 2,500 care beds. Adjusting for the greater care needs in older age categories, gives a demand of 2,600 beds based on the 2016 Census data. The HSE currently lists 49 registered care homes in Cork City and County, which we understand provide a total of c. 2,600 registered beds. This indicates that there is already a shortfall of care home beds when the growth and ageing of the population since 2016 is taken into account.

This shortfall will become critical if the projected growth in population over 65 years (60% by 2030) is matched with a reduction in supply due to obsolescence in the established stock. The Covid-19 pandemic has accelerated the move away from shared bedrooms and bathrooms, with double and triple rooms being

¹ Source: ESRI Projections of Demand for Healthcare in Ireland 2015-2030, October 2017, page 222

² Source: NHI / BDO "Health's Ageing Crisis: Time for Action", 2014, page 22

redesignated to single occupancy. All stakeholders including clients/patients, families, care providers and regulators will now agree on the preference for facilities providing 100% single ensuite (accessible) bedrooms, with ample supporting accommodation and facilities. This will tend to reduce overall capacity as some of the established facilities become functionally or economically obsolete.

The combination of increasing demand and contraction within the existing bed stock will result in significant pressure for new care home developments. Unless the shortage of care beds is addressed within the city environs there will be a sharp increase in referrals and admissions to facilities in out-of-town locations. It is clearly preferable for the new care facilities to be provided close to where people live or receive their medical care and where care homes can be co-located with other complementary healthcare facilities.

Best practice suggests that new care homes should provide at least 50m² gross floor area per resident. The ideal layout would be based on dedicated nursing units (wards) of not more than 30 residents, which are self-contained with day, dining, activity and supporting spaces within the zone. A typical care home will require floorspace of 4,000m² to 6,000m² to provide 75 to 110 beds over 3 floors and a site area of up to 1ha to facilitate good external amenity. There may also be a requirement for specialised layout and design in the case of dementia care. As this type of modern healthcare development may be difficult to accommodate on infill/brownfield sites within the inner suburbs, the most suitable and sustainable locations would appear to be in areas such as Curraheen which are:

- (a) at the edge of the built-up area;
- (b) served by high frequency public transport services; and
- (c) with potential for co-location with the type of healthcare facilities which would complement dementia care.

5. Relevant Planning Precedents

5.1 Dublin City Council

The Dublin City Council Development Plan 2016 recognises that sites adjoining existing healthcare facilities are suitable locations for new development which will directly support the facility:

CEE21: (i) To recognise the strategic role of the hospital complexes in the city, including the proposed National Paediatric Hospital and the proposed new National Maternity Hospital and to support the provision of the appropriate volume of floor space and associated facilities necessary to secure the delivery of their services and potential; having regard to their national medical function, their role as a major employer in the city, as a generator of significant economic benefits for the economy of Dublin's inner city and a promoter of the knowledge economy through research and education links with third-level colleges in the city.

(iii) To capitalise on the opportunities presented by the major public investment in healthcare facilities on the St James's Hospital campus,

including the National Paediatric Hospital, by promoting the wider catchment area as a suitable location for new development, which will either directly support such new facilities (such as by improving public realm in the vicinity and by encouraging the provision of housing for hospital staff); or which will benefit from locational synergy with the hospitals, such as new enterprises in the bio and life sciences, healthcare and related ICT and medical supplies sectors.

RMHC is the designated charity partner to run the proposed new Family Accommodation Unit at the New Children's Hospital at the St. James' Hospital Campus. The charity provided accommodation for 4,200 families attending Our Lady's Children's Hospital in Crumlin House, since 2004.

In relation to the RMHC announcement Minister Donnelly said on 27/07/2021:

"The Ronald McDonald House Charity provides an extremely valuable service to the families of sick children and adolescents in its purpose-built facility on the campus of Our Lady's Hospital Crumlin. The provision of this accommodation for families of sick children means the family can stay together, with the sick child, close to the hospital care and medical community their child needs. The importance and value of this service for the new children's hospital is recognised and I very much welcome that the Charity will continue and expand on this work into the future when services transition from Crumlin to the new hospital."

5.2 Dun Laoghaire Rathdown County Council

A planning application (D21A/0749) has been lodged with Dún Laoghaire Rathdown County Council on 20/08/2021 by Beacon Hospital Sandyford Ltd. for proposed development on the 0.11 ha site of the Beacon Hotel, including a new 8no. storey extension to the existing Beacon Hospital and Beacon One Apartment Complex.

The Beacon Hotel was located adjacent to the Beacon Hospital Group in Sandyford, Dublin. It was approached by the Beacon Hospital Group to explore the possibility of the hospital expanding its facilities and services through the acquisition of the Beacon Hotel.

5.3 Galway City Council

The importance of having the appropriate zoning objectives for healthcare development was highlighted by the outcome of a planning application within the grounds at Merlin Park University Hospital in Galway. Permission was sought for:

Daycare and Residential Healthcare Unit with a focus on Palliative Care Services consisting of Part 2 storey, part 1 storey building comprising 36 no. of inpatient ensuite bedrooms, reception, daycare and therapy spaces, family accommodation, offices chapel, mortuary, library, parking.

The proposed development was permitted by Galway City Council under Planning Ref. No. 18/208. When the decision was appealed under Case No. ABP-302511-18 An Bord Pleanala's Inspector recommended that permission should be granted having regard to:

- the objectives of the National Development Framework;
- the site-specific zoning objective and policies of the Galway City Development Plan 2017-2023,
- the location of the site within the Merlin Park University Hospital Campus, and
- the nature and scale of the proposed development.

However, the Board did not accept the Inspector's recommendation and decided to refuse permission on the grounds that there was an inconsistency in the zoning objectives for the site. Although the City Development Plan included a specific development objective that "the Council will consider the use of these lands for a Hospice", the Board also noted that the site is predominantly located on lands zoned "Natural Heritage, Recreation and Amenity" which form part of a green open space network for the city of Galway and within which the proposed development is not listed as a permitted use

5.4 Cork County Council

The difficulty in achieving permission for expansion of established uses in amenity or green belt areas was also highlighted by the outcome of the planning application by the Munster Agricultural Society for expansion of their showground campus at Curraheen. In this case, Cork County Council decided to grant permission for an event centre on the basis that Policy Objective RCI 5-6 of the County Plan allowed for expansion of established uses within the Green Belt. This decision was overturned by An Bord Pleanala under Case No. ABP-306532-20 on the grounds that Objective RCI 5-6 did not apply to urban generated development.

This Board's decision to refuse permission at Merlin Park due to inconsistency between the healthcare and green belt zoning objectives raises the concern that the proposal in the draft Cork City Development Plan to zone the Marymount campus as "ZO 21 City Hinterland" creates a planning risk for future development of the established healthcare use. It is particularly relevant in that respect that the City Hinterland zoning in the Draft City Plan is more restrictive than the current Green Belt zoning in the 2014 Cork County Development Plan 2014 in so far as it does not include the commitment under Policy Objective RCI 5-6 of the County Plan to:

"Recognise the requirements of long established commercial or institutional uses located entirely within the Greenbelt which may make proposals for expansion / intensification of existing uses".

These appeal cases demonstrate that there may be very limited potential for further development on, or adjoining, the established healthcare campus at Curraheen under the City Hinterland zoning objective which is currently proposed in the Draft Cork City Plan.

6. Request for Rezoning

The purpose of this submission to the Draft City Development Plan is to highlight the need to amend the development boundary at Curraheen. The proposal to zone the Marymount campus as part of the City Hinterland does not reflect the metropolitan status and future development potential of the established healthcare campus.

It would be appropriate, in our opinion, for the existing campus and some of the adjoining lands to the west to be specifically zoned for Institutional and Community Use (ZO 14). This approach would be consistent with the precedents established by healthcare policies in other metropolitan areas and would ensure that adequate zoned and serviced land will be available if required for the expansion of the established services and for the future co-location of related healthcare facilities and ancillary services.

The new zoning objective should include provision for residential care homes as a major shortfall in provision is likely to emerge from the combination of:

- (a) The increasing demand from the rapidly growing and ageing population of the Cork Metropolitan Area for care homes in general and particularly for those specialising in dementia care;
- (b) Increasing obsolescence within the existing stock and the need to adapt existing facilities to provide specialised services such as dementia care and to achieve the new standards which will now be required as a result of the Covid-19 pandemic;
- (c) The need for more sustainable locations for care homes so that they are close to existing centres of population and accessible to high frequency public transport.

Apart from care homes specialising in dementia care, provision should also be made for other healthcare and ancillary uses which would benefit from co-location with the Marymount campus. These may include hotel or guest house accommodation for day care service patients and their family / friends in the vicinity of the campus.

The map attached as Fig 3 demonstrates that the Curraheen area is particularly suitable for further healthcare and ancillary development due to:

- Proximity to Cork University Hospital and Cork University Dental Hospital.
- Location on the high frequency 208 bus route which already links the major city healthcare sites.
- Proximity to the new public transport and cycle networks proposed by CMATS.
- Immediate access to a wide regional catchment via the N40 national route.
- Proximity to a wide range of medical and pharmaceutical research facilities at University College Cork, Munster Technological University and Cork Science and Innovation Park.

In summary, the draft City Development Plan should facilitate future healthcare development at Curraheen by rezoning the existing Marymount campus and some of the adjoining lands as "ZO 14 - Institutions and Community".



Fig 3: Land available for rezoning at Curraheen in relation to the existing built up area and the improvements proposed by CMATS to the public transport network