



## **Submission to the Draft Cork City Development Plan 2022 -2028**

Health and Primary Care Related Uses in Cork

**Health Service Executive**  
October 2021

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# 01. Introduction

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## 1.1 SUBMISSION PURPOSE AND CONTEXT

This submission has been prepared on behalf of the Health Service Executive (HSE) in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft CDP). The HSE welcome the publication of the Draft Cork City Development Plan 2022 – 2029 and their recognition of their role in delivering vital healthcare infrastructure over the period of the forthcoming Development Plan. As documented in the Draft Plan, the public health care system is undergoing strategic change as set out in 'Slaintecare' where a key objective is to facilitate a transition towards a primary and community based health care system.

The Draft Development Plan appropriately notes "*the importance of health to 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 submission is being prepared as a consequence of the lessons learnt from the Covid-19 pandemic and the need to enhance the existing health and primary care infrastructure in the city. The HSE has identified several sites in their ownership which would have the potential development capacity to respond to the increasing requirement for health and primary care facilities.

This submission relates to 4 no. specific sites in the ownership of the HSE as listed below and we consider that the Draft Plan needs to be updated to accurately reflect their existing use and/or to make adequate provision for their future expansion. These sites have been identified as having the capacity for expansion and/or intensification of healthcare uses during the lifetime of the forthcoming development plan.

- St. Stephen's Psychiatric Hospital, Glanmire (Sarsfield Court);
- St. Mary's Health Campus, Gurranabraher;
- The Carrig Mor Centre (St. Anne's), Shanakiel Road; and
- Former Blarney Hotel, Tower.

In addition to the site specific planning policies and objectives relating to the above sites, the HSE would welcome some amendments to the current text as set out in Section 3.80 of the Draft Development Plan.

## 1.2 SUBMISSION REQUEST

The HSE would welcome amendments to the current text in Section 3.80 of the Draft Development Plan to ensure that future healthcare developments have regard to the lesson learnt from the Covid-19 pandemic including the need to expand and intensify existing healthcare facilities. Suggested text is provided below:

*"In addition to the strategic new development proposals, there **will be** requirements to **intensify**, expand and undertake development works to existing healthcare facilities in the city. **These will be required to reflect the learnings from Covid-19 and to ensure that developments are progressed in line with the requirements for a major trauma centre for the south of the country.**"*

### 1.2.1 St. Stephen's Psychiatric Hospital, Glanmire (Sarsfield Court)

We request that the proposed zoning objective for St. Stephen's Hospital campus is amended to accurately reflect its current use as a healthcare facility. In recognition of this fact it should be rezoned from ZO 21 – City Hinterland where the objective is *"to protect and improve rural amenity and provide for the development of agriculture"* to Objective ZO 14 – Institutions and Community where the stated aim is *"to provide for and protect institutional and community uses."*

### 1.2.2 St. Mary's Health Campus, Gurranabraher

The St. Mary's Orthopaedic Hospital site is zoned ZO 1 - Sustainable Residential Neighbourhoods where the stated aim is *"to protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses"* and ZO 18 – Landscape Preservation Zones *"to preserve and enhance the special landscape and visual character of Landscape Preservation Zones"*. We request that the Landscape Preservation Zone is rationalised to accurately reflect the landscape attributes of the site, being the existing tree line along the southern boundary. This will allow for the extension of the ZO 1 - Sustainable Residential Neighbourhood zoning objective to the existing tree line.

### 1.2.3 The Carrig Mor Centre (St. Anne's) Shanakiel Road

The Carrig Mor Centre on the St. Anne campus currently does not have a zoning designation. The surrounding lands on the St. Anne's site are zoned ZO 17 - Sports Grounds and Facilities where the aim is *"to protect, retain and enhance the range and quality of sports facilities and grounds."* We request that the existing use is accurately reflected in the Draft Plan and that provision be made for its future expansion. This will require Carrig Mor Centre to be rezoned to Objective ZO 14 – Institutions and Community where the stated aim is *"to provide for and protect institutional and community uses"*

### 1.2.4 Former Blarney Hotel, Tower

We request that the proposed zoning objective for the Former Blarney Hotel is amended to accurately reflect its current use as a healthcare facility. To facilitate this the site should be rezoned from ZO 21 - City Hinterland where the stated objective is *"to protect and improve rural amenity and provide for the development of agriculture"* to Objective ZO 14 – Institutions and Community where the stated aim is *"to provide for and protect institutional and community uses"*.

# 02. Planning Considerations

As set out in Section 01 of this submission, Cork City Council have recognised the government's commitment to focus on primary health care facilities within the community that have a more localised approach to providing a high level of quality healthcare in the Draft Development Plan. However, in considering the need for the intensification and expansion of established health and primary care facilities a number of material planning considerations are put forward on behalf of the HSE to accommodate future growth in the healthcare industry.

## 2.1 ST. STEPHEN'S HOSPITAL, GLANMIRE (SARSFIELD COURT)

St. Stephen's Hospital (Sarsfield Court) is identified on Figure 2.1 below and is a long established healthcare facility. However the lands are zoned ZO 21 – City Hinterland where the objective is *"to protect and improve rural amenity and provide for the development of agriculture"* as highlighted on Figure 2.2.

Figure 2.1 Site Location Map



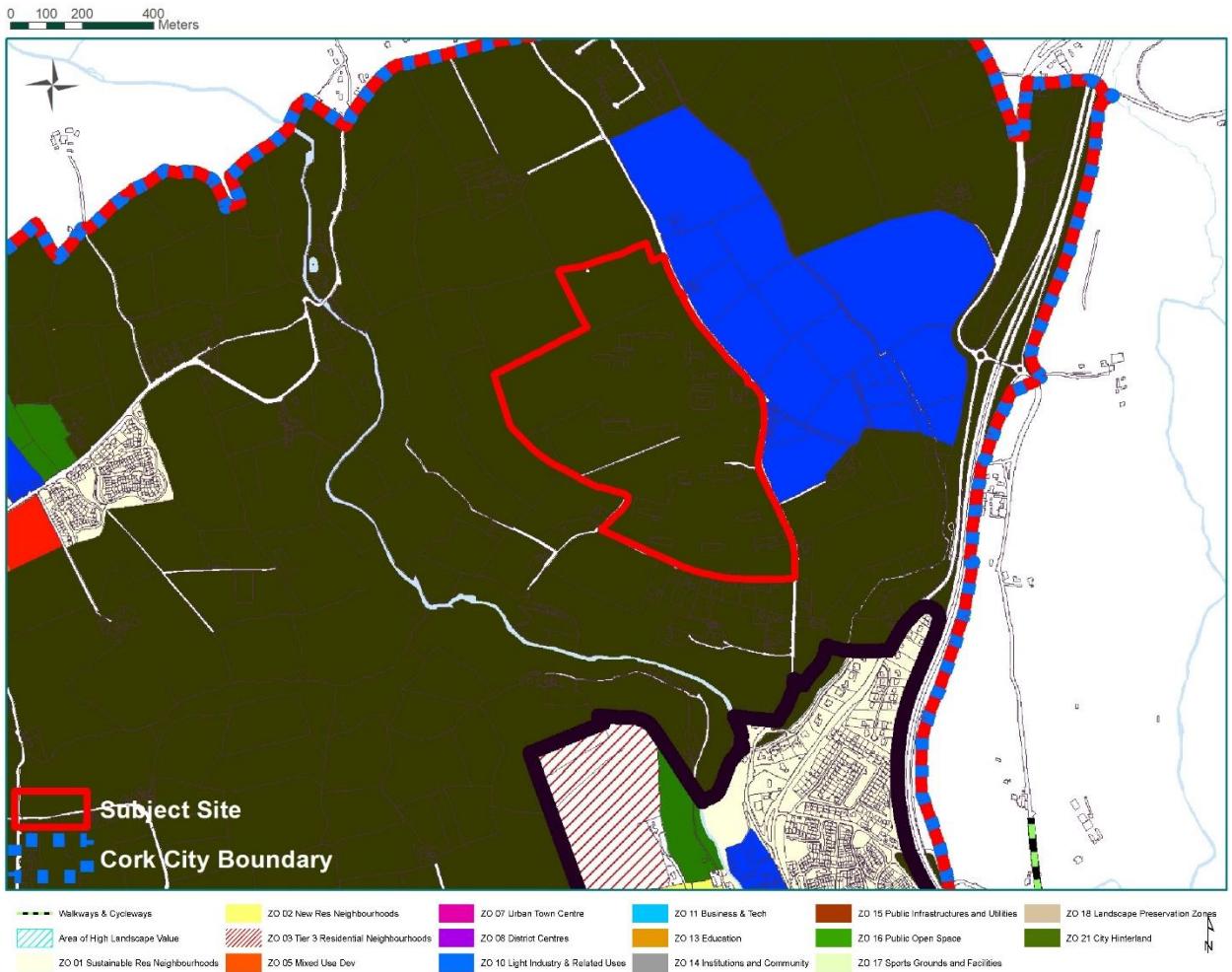


Figure 2.2 Draft Plan Zoning Map

The longstanding hospital campus, a non-conforming land use, has been primarily utilised for mental health services. The hospital provides specialised services that are not akin to an acute hospital such as Cork University Hospital and a present a genuine opportunity to deliver primary and community led health care for Glanmire and environs. The Draft Plan envisages ZO 14 – Institutional and Community zoned lands to apply 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.*”

We consider the location and site characteristics of the St. Stephen's campus lend itself to accommodate a health care facility that would have a positive impact on the surrounding area. St. Stephen's hospital is located to the west of the M8 Cork-Dublin motorway on the Sarsfield Court Road (L2973), to the north of low density residential developments and established commercial uses at Sallybrook Industrial Estate. Glanmire Town is located c. 2 km (as the crow flies) to the south of St. Stephens Hospital campus which presents an opportunity to create excellent pedestrian and cycle connection to Glanmire Town. Sarsfield Court Industrial Estate is located further to the north with agricultural lands directly opposite St. Stephen's Hospital on the Sarfield Court Road zoned ZO 10 – Light Industry & Related Uses in the Draft Development Plan.

### 2.1.2 Regularisation of the existing non-conforming use on site

The established health care use at St. Stephens' hospital campus is a non-conforming use. The rezoning of the HSE lands to institutional and community, where hospitals and primary health

care facilities are permitted in principle, at this location would secure the future of health care use and provide clear policy support for the expansion and intensification of the existing use.

In the interest of proper planning, we consider that the Development Plan should regularise the long standing health care use which in our opinion does not have a serious detrimental impact on the zoning objectives for the lands surrounding the site.

### 2.1.3 Consolidation of Glanmire as an Urban Town

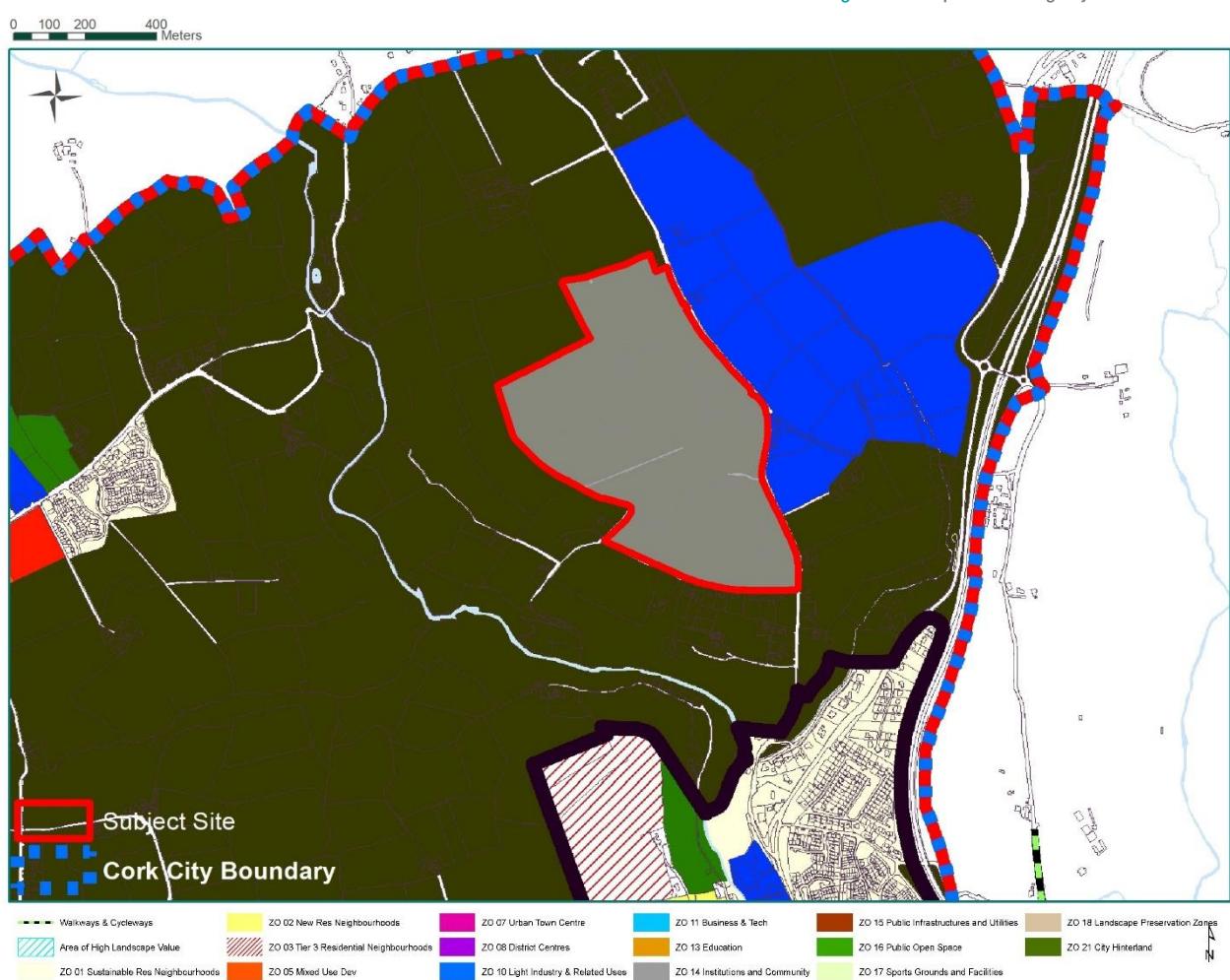
The zoning of the subject lands to ZO 14 - Institutions and Community and subsequent expansion and intensification of healthcare uses at this location would complement the proposed zoning of the strategic employment site (57 ha) located to the east of St. Stephen's hospital to Light Industry and Related use. The objective of light industry and related uses is to *"provide for and protect dynamic light industry and manufacturing employment areas...where the primary activity is compatible with being located near to residential areas."*

We consider that the rezoning of the HSE lands to ZO 14 – Institutional and Community in combination with the proposed adjacent Light Industrial lands, identified as a Strategic Employment Site, in the Draft Plan would support Glanmire as a well-considered Urban Town by providing a valuable employment node in Cork.

### 2.1.4 Request

We request that St. Stephen's Hospital campus is rezoned from ZO 21 – City Hinterland as shown in the Draft Development Plan where the objective is *"to protect and improve rural amenity and provide for the development of agriculture"* to Objective ZO 14 – Institutions and Community where the stated aim is *"to provide for and protect institutional and community uses."* as identified on Figure 2.3 below

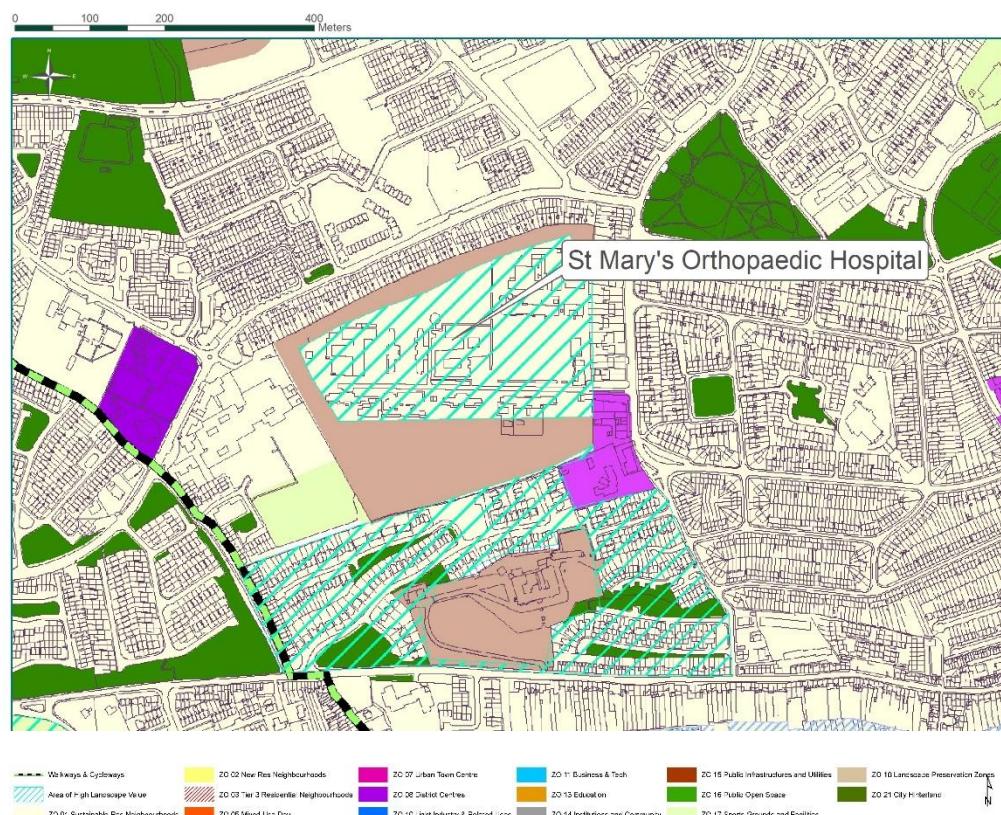
Figure 2.3 Proposed zoning objective



## 2.2 ST. MARY'S HEALTH CAMPUS, GURRANABRAHER

The St. Mary's Health Campus, formerly known as the St. Mary's Orthopaedic Hospital, provides existing primary care and mental health services. The subject lands as shown at Figure 2.4 below are zoned ZO 1 - Sustainable Residential Neighbourhoods where the stated aim is “*to protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses*” and ZO 18 – Landscape Preservation Zones “*to preserve and enhance the special landscape and visual character of Landscape Preservation Zones*”.

Figure 2.4 Draft Plan Zoning



### 2.2.2 Realignment of the Landscape Preservation Zone

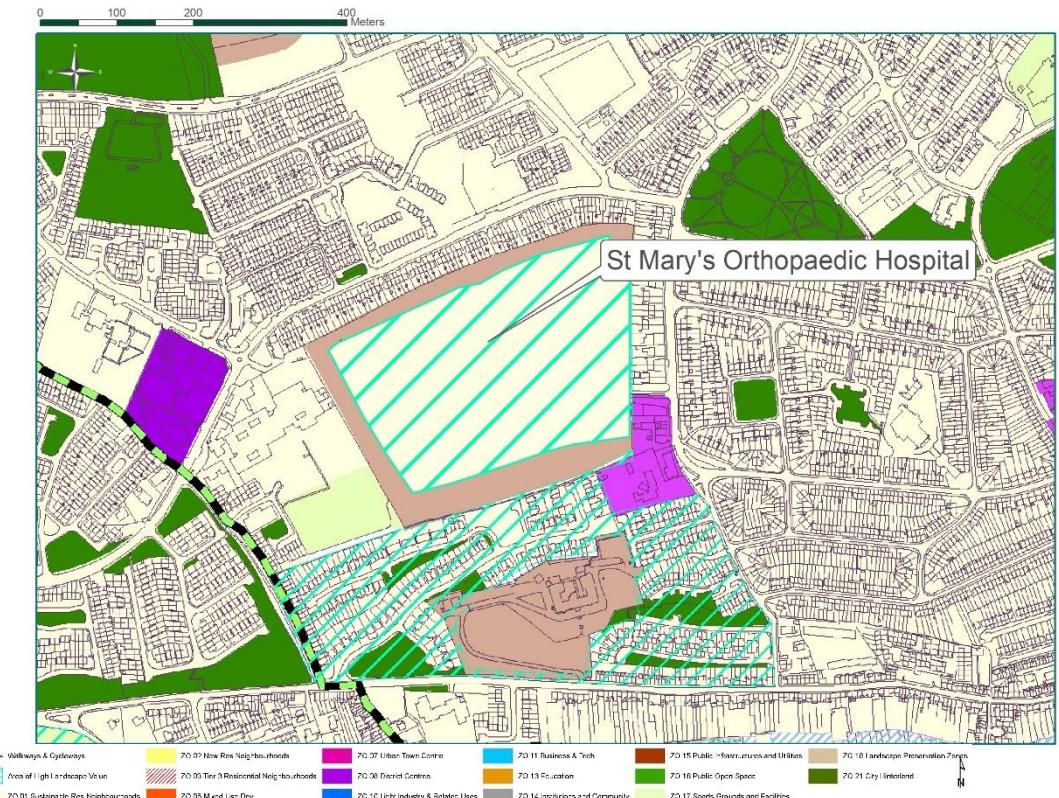
In reference to Landscape Preservation Zones, the Draft Plan specifies that “*these areas have been identified due to their sensitive landscape character and are protected due to their special amenity value, which derives from their distinct topography, tree cover, setting to historic structures or other landscape character.*” Furthermore indicating that “*Many of these sites have limited or no development potential due to their landscape character. There is a presumption against development within this zone...*”

While we acknowledge the importance of the Gurranabraher Ridge as a designated Landscape Preservation Zones, we consider the extent of lands zoned does not accurately reflect the intentions of the objectives set out in the Draft Plan. The Draft Plan identifies the following site specific objective “*to increase tree cover in the lower slopes of the hospital site and to protect and enhance the existing tree coverage at the boundary of the site*” and “*to explore potential for publicly accessible vantage point*”

The current ZO 18 lands illustrated in the Draft Plan include a reasonable quantum of undeveloped lands on the southern side of the campus where there are no existing trees. We

consider that these site specific objectives can be achieved within a more refined Landscape Preservation Zone boundary. This rationalisation of the draft land use zoning with the land use objectives as set out in the Draft Development Plan would reflect the existing situation. The HSE have identified these lands as having the potential for the expansion and intensification of primary and acute health care facilities within an established health care campus. We request the rationalisation of Landscape Preservation Zone as highlighted in Figure 2.5 below.

Figure 2.5 Proposed draft zoning map



### 2.2.3 Suitable expansion of the established Sustainable Residential Use

We consider that the extension of the existing ZO 1 – Sustainable Residential Use zoning objective would be appropriate at this location having regard to the established suburban environment and the existing pattern of development in the St. Mary's Health Campus.

The expansion and intensification of health and primary care related uses at this location would support the principles of sustainable development by providing a range of local health services and community facilities within close proximity of an existing population. The co-location of such local and community facilities would encourage the efficient sharing of resources. The forthcoming Development Plan should have particular regard to the vision for the future of the health care system as set out in Slaintecare. The Slaintecare Implementation Strategy<sup>1</sup> asserts that “...the fact that Hospital Groups and Community Healthcare Organisations are not

<sup>1</sup> Slaintecare Implementation Strategy, Government of Ireland. Available at: <https://www.gov.ie/en/publication/0d2d60-slaintecare-publications/#slaintecare-implementation-strategy>

*geographically aligned impedes the kind of integrated planning and care delivery that Sláintecare espouses”*

The expansion of the Zo 01 – Sustainable Residential objective would contribute to the delivery of a consolidated health care campus. Such development would be aligned with the key principles of Slaintecare<sup>2</sup> which aim that “...the vast majority of care takes place in primary and community care settings”.

The expansion of the established sustainable residential use zoning objective would accommodate the further expansion of services being delivered by the HSE to an existing population and represent the proper planning and sustainable development of the subject lands.

#### **2.2.4 Request**

We request that the Landscape Preservation Zone is aligned with the existing tree line to the south and that the ZO-1 Sustainable Residential Neighbourhood zoning objective is extended up to the existing tree line.

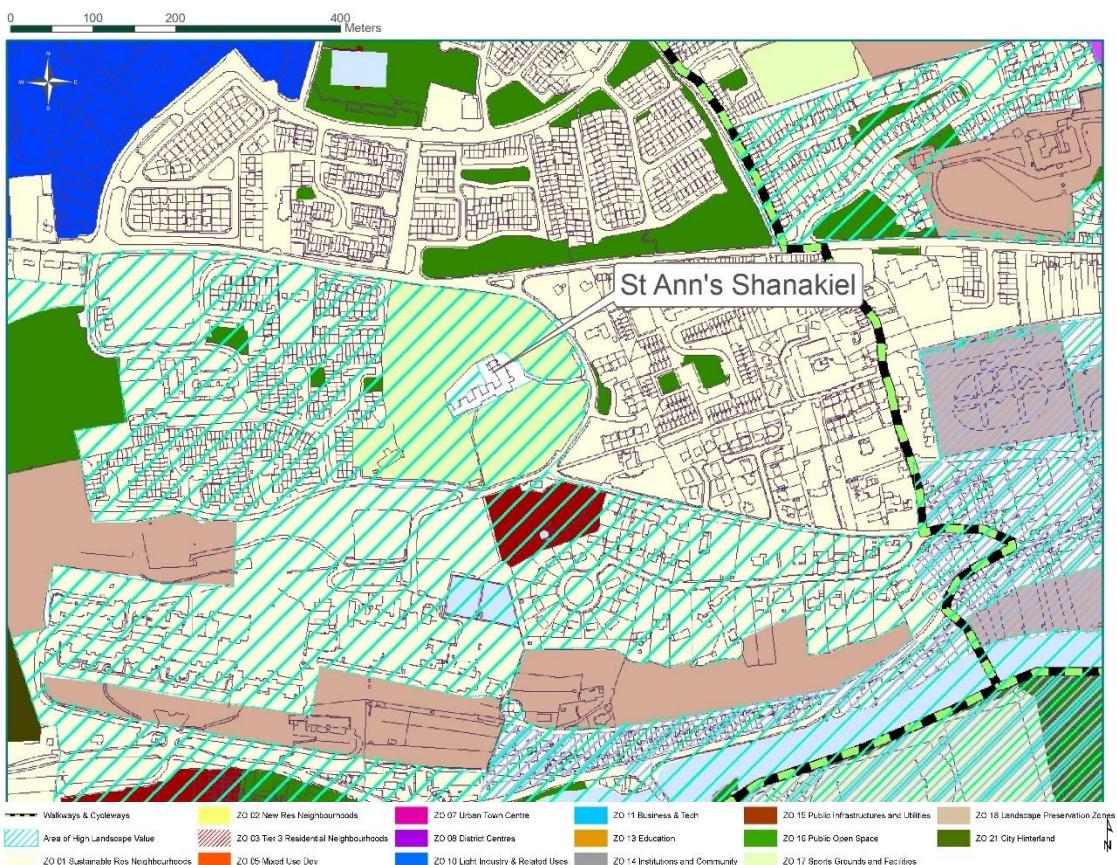
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<sup>2</sup> *ibid*

## 2.3 THE CARRIG MOR CENTRE (ST. ANNE'S), SHANAKIEL ROAD

The St. Anne's campus currently comprises the Carrig Mor Centre, a Psychiatric Intensive Care Unit, and a pitch and putt club. As illustrated in the extract below from the Draft Development Plan there is no zoning objective on the existing Carrig Mor Centre building or immediately surrounding grounds. The wider surrounding lands on the St. Anne's site are zoned ZO 17 - Sports Grounds and Facilities where the aim is *"to protect, retain and enhance the range and quality of sports facilities and grounds"* as shown in the Draft Plan Zoning Map below.

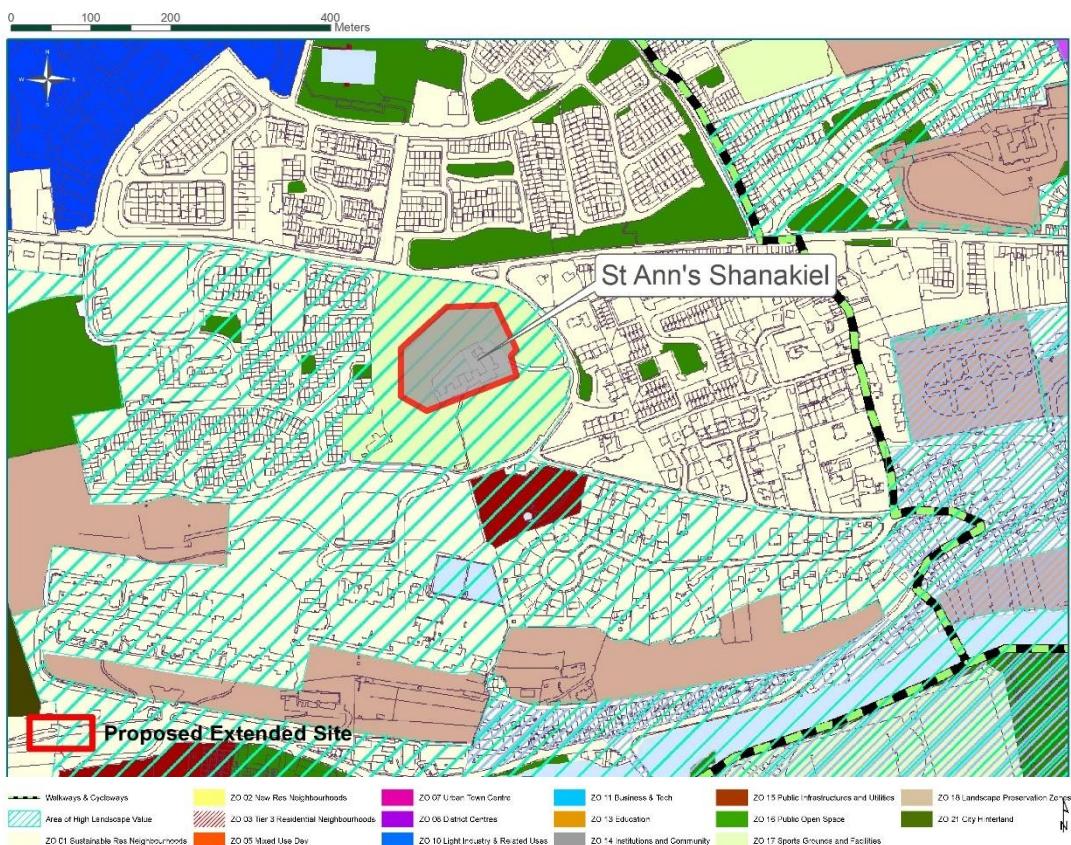
Figure 2.6 Draft Plan Zoning



### 2.3.2 Expansion and intensification of established uses at the St. Anne's campus

In recognising the potential for the expansion and intensification of established uses at the St. Anne's campus, we request that the non-designated building and immediately surrounding non-designated lands are identified as Objective ZO 14 – Institutions and Community with an objective *"to provide for and protect institutional and community uses."* The established health care use at St. Anne's is consistent with the aims and objectives for Institutions and Community land use.

Figure 2.7 Proposed zoning map



The HSE recognise the potential for the future expansion and intensification of health care uses to meet the demand for the delivery of vital health care services. We consider that the rezoning of a portion of ZO-17 Sports Grounds and Facilities lands to Objective ZO 14 – Institutions and Community would accommodate this development potential.

The designation and expansion of Objective ZO 14 – Institutions and Community lands at this location would not impact on the existing complementary use of ZO-17 Sports Grounds and Facilities lands.

We note that the subject lands are located in an Area of High Landscape Value (AHLV) where there is an aim “*to conserve and enhance the character and visual amenity of Areas of High Landscape Value (AHLV) through the appropriate management of development....*”.

We highlight that healthcare use is a longstanding use at the subject site and the appropriate recognition of such would not detrimentally impact on the AHLV. While the addition of Institutions and Community zoned lands would facilitate more flexibility in the future expansion and intensification of these lands, we highlight that any future development would be subject to a comprehensive assessment to ensure that such development would not negatively impact on the site specific objectives of the AHLV.

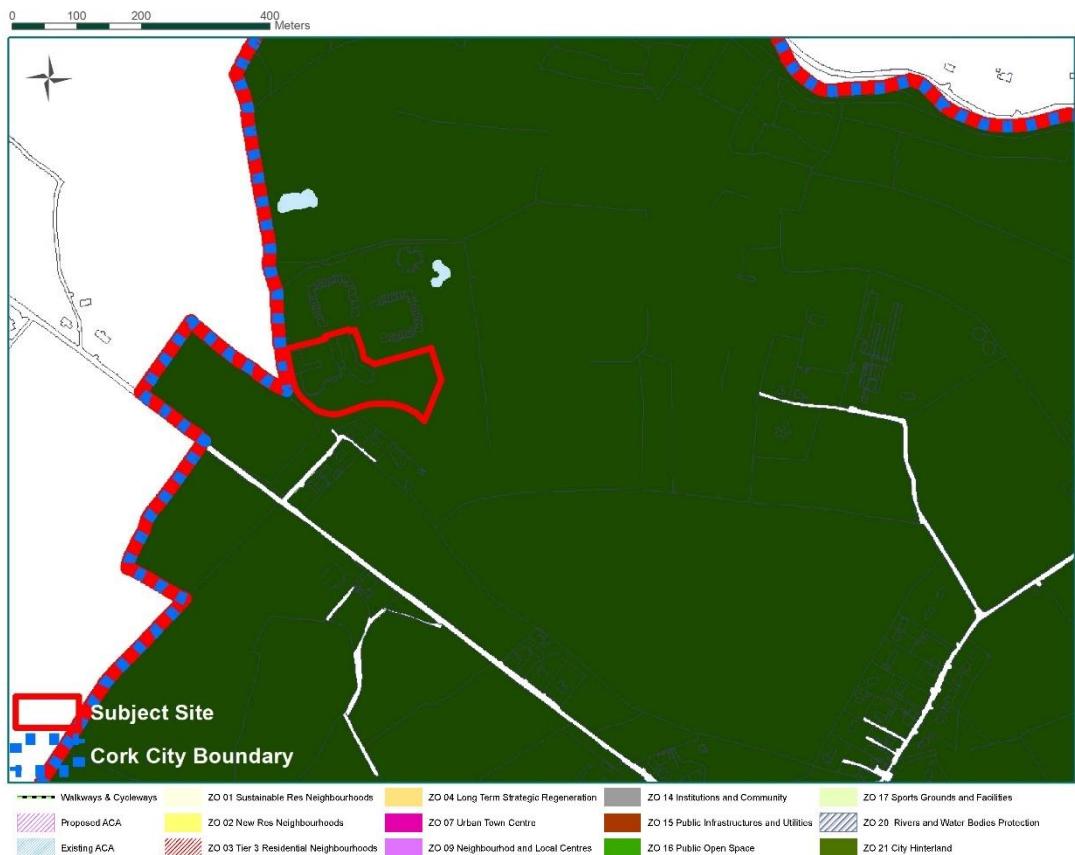
### 2.3.3 Request

We request that the lands occupied by Carrig Mor Centre are rezoned to Objective ZO 14 – Institutions and Community where the stated aim is “*to provide for and protect institutional and community uses*” in addition to a portion of ZO-17 Sports Grounds and Facilities lands rezoned to Objective ZO 14 – Institutions and Community.

## 2.4 FORMER BLARNEY HOTEL, TOWER

The Former Blarney Hotel has recently been acquired by the HSE and the hotel being converted to a community nursing home under SI No. 93 of 2020. The subject lands are zoned ZO-21 City Hinterland in the Draft Development Plan where the stated objective is *“to protect and improve rural amenity and provide for the development of agriculture”*. The nursing home use will therefore be a non-conforming use at the time of adopting the forthcoming development plan. The extent of lands subject to this submission are identified in Figure 2.8 below:

Figure 2.8 Draft plan zoning map



### 2.4.2 Regularisation of community care facility

It is anticipated that the works to convert the former hotel to a nursing home will be completed and operated imminently having regard to the criteria set out under SI No. 93 of 2020. The rezoning of the former Blarney Hotel and a portion of the curtilage to Objective ZO 14 – Institutions and Community where the stated aim is *“to provide for and protect institutional and community uses”* would therefore ensure that the nursing home facility would be a conforming use at the time of adopting the Development Plan.

The conversion of the former hotel is a direct response to the acute shortage of public nursing home beds for the older cohort of the population. The recognition of an established use at the time of adopting the forthcoming development plan would afford the HSE the flexibility to further enhance the facilities during the lifetime of the development plan.

### 2.4.3 Complementary land use zoning objectives

We consider Objective Z0 14 – Institutions and Community zoned lands to be a complementary use to the surrounding Z0 21 - City Hinterland. The Development Plan recognises that Z0 14 land uses "...play an important role in providing key strategic services for communities across the city and often much further afield". We submit that the community nursing home at the subject site will serve the wider surrounding area of Tower and Blarney. An aerial photograph identifying the location of the subject lands and the receiving context is provided below.

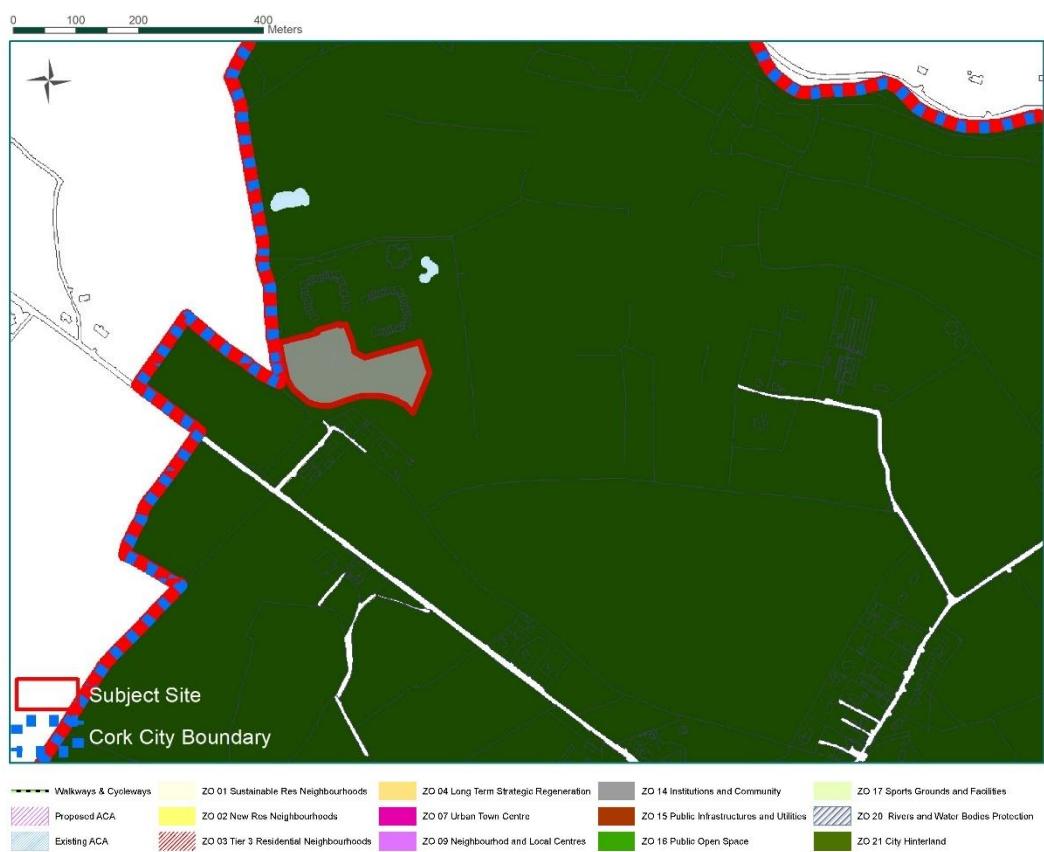
Figure 2.9 Surrounding context of the subject lands



### 2.4.4 Request

We request that the Former Blarney Hotel is rezoned from Z0 21 - City Hinterland where the stated objective is "to protect and improve rural amenity and provide for the development of agriculture" to Objective Z0 14 – Institutions and Community where the stated aim is "to provide for and protect institutional and community uses" as highlighted on Figure 2.10.

Figure 2.10 Propose zoning map



## 03. Summary

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We welcome the opportunity to make this submission to the Stage 2 Public Consultation Draft City Development Plan 2022-2028 on behalf of the HSE. As outlined in this submission, we request the wording of Section 3.80 of the Draft Development Plan to be amended in the next stage of the Development Plan process to ensure that future healthcare developments have regard to the lessons learnt from the Covid-19 pandemic including the need to expand and intensify existing healthcare facilities.

In addition to the above and for the reasons set out in this submission, we request the following site specific requests on behalf of the HSE:

- St. Stephen's Hospital campus is rezoned from ZO 21 – City Hinterland to Objective ZO 14 – Institutions and Community in recognition of its long established use and to provide policy support for its future expansion;
- The Landscape Preservation Zone at St. Mary's Health Care Campus Hospital site is aligned with the existing tree line to the south and that the ZO-1 Sustainable Residential Neighbourhood zoning objective is extended up to the existing tree line;
- The lands occupied by Carrig Mor Centre are rezoned to Objective ZO 14 – Institutions and Community in addition to a portion of ZO-17 Sports Grounds and Facilities lands rezoned to Objective ZO 14 – Institutions and Community to reflect the existing use and provide for future expansion; and
- The Former Blarney Hotel is rezoned from ZO 21 - City Hinterland to Objective ZO 14 – Institutions and Community in recognition of its intended future use.

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