An Chomhairle Oidhreachta
The Heritage Council

Planning Ref: 2660433

11 August 2026

Planning Section
Clare County Council

Dear Sir/Madam

RE: 2660433 - Large-Scale Residential Development at the Former Our Lady's Hospital and grounds (RPS 845) within an Architectural Conservation Area AT Our Lady's Hospital, Gort Road, Dulick, Ennis, Co. Clare.

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council welcomes the proposed conservation-led regeneration of the former Our Lady's Hospital complex. The development presents an important opportunity to secure the long-term future of a significant heritage asset in Ennis through repair, conservation and adaptive re-use while contributing to compact growth, brownfield regeneration and the re-use of existing building stock.

The Heritage Council is of the view that the principle of development should be supported. It represents a sound approach at the level of first principles in relation to the most sustainable locations for development and seeks to bring back into use large institutional protected structures, of which there are many vacant and derelict in the country.

The application site comprises the former Our Lady's Hospital complex, including the principal Protected Structure (*RPS No. 845*) (*NIAH Reg. 20403313*), the former chapel, associated outbuildings, boundary structures and landscaped grounds, all of which contribute to a strong architectural heritage character that has justified the designation of Our Lady's Hospital Architectural Conservation Area.

Despite prolonged vacancy (since 2002), the principal buildings retain a high degree of architectural heritage significance and continue to define the historic character of the Architectural Conservation

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Area. The buildings are prominent landmarks whose influence extends beyond the site itself but to the wider townscape in the northern part of Ennis.

The emphasis on retaining and adapting the principal historic buildings, together with the selective removal of later interventions of limited heritage significance, reflects the principles of sustainable conservation. Furthermore, the adaptive reuse of the existing institutional complex delivers important sustainable benefits through the retention of embodied carbon.

We believe the proposal in principle aligns with Objectives *CDP 17.11, CDP 6.15, CDP 5.4* and *CDP 4.13* of the Clare County Development Plan 2023-2029 and the National Planning Framework 2025, through promoting infill development, brownfield regeneration, the renewal of underutilised areas and compact growth.

Architectural Heritage

We have focussed primarily on the Design Statement, the Architectural Heritage Impact Assessment and the associated drawings.

Despite the current condition of the buildings on site, the submitted documentation demonstrates that the principal heritage assets retain substantial capacity for repair and continued use. It is evident that the approach to the design and layout of the scheme has been well considered. The appreciation afforded to the legibility of the primary elevations of the main heritage features on site is recognised and welcomed.

There are several primary interventions and proposals associated with the scheme. These include the construction of new build elements to the south-west and the northern part of the site. In addition, the proposals involve the demolition of later interventions to the main hospital building, demolition of the dining hall building to the rear, and the refurbishment of the hospital building, chapel and four outbuildings.

Principal Building - The proposal includes the construction of three extensions ranging from one to three storeys in height to facilitate the delivery of 88 residential units within the former hospital complex. The works also include physical connections between the new extensions and the existing building, localised alterations to the rear façade and the removal of later fabric to facilitate the extensions.

These interventions appear confined to the rear of the building, thereby ensuring that the principal elevations and historic form of the protected structure remain dominant. This approach appears to minimise intervention to the historic fabric, with most removals relating to modern additions of limited heritage significance. We also note that new openings have been minimised and are confined to those required to connect the new extensions with the main building.

The submitted drawings and accompanying AHIA indicate that windows and doors in good

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condition will be repaired and retained, while those beyond repair will be replaced on a like-for-like basis. Selective internal demolition is proposed where prolonged vacancy, water ingress and fire damage have rendered elements beyond repair. The Heritage Council accepts limited replacement will be necessary in these instances to facilitate the building's long-term conservation and viable reuse.

Outbuildings - We welcome the re-use of the four buildings, whereby repairs to the roof structures, masonry and external fabric are supported and will assist in securing their long-term conservation. The removal of the fire damaged dining hall is considered acceptable given its compromised condition. Its removal will help re-establish the historic relationship between the outbuildings and facilitate the creation of a courtyard and public realm.

Chapel - The former chapel is one of the most intact surviving buildings within the complex and derives significance from the survival of its external form, plan and ecclesiastical features. The Heritage Council notes that as described in the submitted documentation, the proposed works are generally limited in nature and comprise conservation repairs to the building envelope, accessibility improvements and internal alterations necessary to facilitate community use. The submitted drawings indicate that the principal elevations will remain unchanged, with external works confined to repair, cleaning and removal of vegetation.

Internally, the proposals include the reconfiguration to improve circulation, the introduction of universally accessible WC, repair of existing windows and the removal of the altar, steps and associated ecclesiastical elements for conservation (as indicated on Drawing P-63). The Heritage Council recommends their retention in situ, or that their incorporation within the proposed community use is fully explored prior to any removal for offsite preservation, as these elements provide important evidence of the buildings original function, thereby contributing to its architectural and cultural significance. These elements provide tangible evidence of the buildings original purpose, thereby contributing to its heritage value.

New development blocks and visual setting of protected elements – We are satisfied with the approach taken to the layout of the new build development blocks. In particular, the separation between the new build blocks by a public plaza enhances visual permeability and preserves key views towards the main hospital building, chapel and public realm spaces. This ensures that their architectural character remains central to the overall scheme. The duplex and terrace developments appear to be arranged to respect the historic form and layout of the surrounding historic buildings and curtilage structures, being mostly to the rear of the primary building.

We have reviewed the assessment of impacts of these proposed interventions, as contained within the AHIA, particularly *Section 5.0* and the associated table of impacts (pages 47-52). In some instances, the table would benefit from a more itemised description of each intervention, rather than broader descriptions of works, as well as detailing a more qualitative magnitude of impact expected from each intervention to the historic fabric. As an example, the refurbishment of the chapel will involve minor alterations, yet these alterations do not appear to be specifically

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interrogated in great detail e.g. the removal of the altar, whilst may be justifiable is not discussed in this table.

It is therefore important that any grant of permission be accompanied by conditions that reflect the AHIA's recommendations under section 7, specifically measures 3, 5, 6, 7. A method statement for the works should be prepared for all interventions affecting the protected structure, chapel and associated outbuildings. We believe this can be achieved by condition to any subsequent permission granted.

We would also recommend that every effort is explored to ensure that the removal of any of the internal historic fabric should be keep to a minimum to ensure that the positive aspiration of re-use is not outweighed by the loss of historic fabric. The demolition plans do indicate relatively substantial removal of partitions/staircases etc.

Within this context we would also recommend a condition that works to the Protected Structure, its curtilage, and within its setting, are to be managed and supervised on an ongoing basis by a Conservation Architect accredited to the appropriate grade by the Royal Institute of Architects of Ireland or the Royal Institute of British Architects or an Architect entered on the Register of Practitioners of Traditional Building and Conservation Skills maintained by the Irish Georgian Society; the name of which is to be submitted to the planning authority two weeks prior to the commencement of works.

In broad terms we believe the proposals seek to comply with Objectives 16.5, and Objective 16.2 of the Clare County Development Plan 2023-2029.

Landscape and biodiversity

A review of the landscape plan and the tree protection/removals plans indicate a sound approach to the retention of natural features and key amenity trees. Whilst some trees will be removed, the Landscape Plan [Drawing 02 Rev 1] does note that the existing mature trees and hedgerows will be retained and incorporated. With the future ornamental planting being identified as native species.

The primary habitats on site which have most ecological value are the neutral grassland, buildings that have bat roost potential, and the mixed broad leaved/ conifer woodland. The latter appears to remain largely intact after the development and while there will be losses of grassland habitat to accommodate the new development blocks, there will remain areas of neutral grassland. The remaining grassland areas should be managed for nature. The documentation notes wild meadow areas managed in accordance with the All-Ireland Pollinator Plan. We would also agree that the existing seedbank should be sufficient, along with a suitable mowing maintenance regime to achieve desire outcomes for more a species rich grassland.

Given the number of buildings on site, whereby several gaps and openings are evident, this site

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does have high bat roost potential. The mature trees on site will also have such potential. The retention of such is therefore very important, along with other areas of vegetation including the establishment of species rich grassland to ensure that greater foraging opportunities will still be available on site.

We acknowledge that derogation licences are required for both the chapel and the main building with due regard to the submitted bat survey reporting. We recommend that liaison with the NPWS is undertaken in relation to timelines for derogation and granting of permission.

In conclusion, conditions in relation to the following are needed:

- Protection of root protection zone of trees to be retained
- Management and maintenance regime to reflect All Ireland Pollinator Plan
- Removal of vegetation to be undertaken outside of the bird breeding/nesting Season (1st March to 31ST August)
- Liaison with the NPWS on the timing of bat derogation licence

In broad terms, we believe the scheme seeks to comply with CDP 15.1, and CDP 15.8 and 15.14 of the Clare County Development Plan 2023-2029.

Conclusion

The Heritage Council is concerned regarding vacancy and dereliction in Irish settlements. Institutional and administration buildings can pose specific challenges for re-use. This includes former hospitals, convents, court houses, and bank buildings. Such buildings usually have high prominence and landmark status, and their vacancy and dereliction need to be addressed through adaptive re-use. Many are located within towns, cities and villages and therefore their re-use aligns with sound planning principles of brownfield development and town centre first policies.

The proposal anchors of the key heritage features on site. We have recommended conditions that are needed to ensure that all aspects of heritage on site are managed in a manner that does not undermine to overall positive benefits of the scheme.

I trust this submission will aid the local authority in its determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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