



Planning Ref: 3583/24

29 May 2024

Dublin City Council,  
Planning Registry Section,  
Civic Offices,  
Wood Quay,  
Dublin 8.

Dear Sir/Madam

**Re: 3583/24 PROTECTED STRUCTURE: For permission for development at a site located at the junction of Haddington Road with Eastmoreland Lane incorporating vacant buildings forming part of the former Baggot Street Community Hospital, including No. 19 Haddington Road and a 3-storey flat roofed structure fronting Haddington Road in addition to non-original extensions connecting to the Royal City of Dublin Hospital RPS Ref. No. 446 in Dublin 4.**

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 control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council support efforts to ensure adequate community health care provision. We do not have specific concerns regarding the new build elements for the primary care centre in isolation. Although we recommend that public realm elements include soft landscaping and that the buildings earmarked for demolition undergo a bat survey.

However, there is concern for the existing Royal City of Dublin Hospital (Baggot Street Hospital), which is listed on Dublin City Council's Record of Protected Structures (Ref No 446), and its future integrity. This is a building of exceptional architectural merit and is an important part of the cityscape in this area. The Architectural Design Statement provided with the application indicates that the entire complex occupies a site where all the existing buildings are entirely vacant. We note in this statement that a decision was made in 2019 to vacate the Baggot Street Campus for several reasons, including "limitations of the protected structure and the presence of asbestos". Summaries for a range of feasibility studies have been provided in the Architectural Design Statement which detail the challenges for the building's use as a health care facility. As set out, these relate to structure, fire safety, access, services and conservation, cost, and time.

**Baill na Comhairle | Council Members**

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Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
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Feasibility issues for the provision of a healthcare facility are recognised by the Heritage Council. However, we also have a growing concern regarding vacancy and dereliction in Irish villages, towns, and cities. Properties in central, attractive locations such as this, particularly institutional buildings, are also susceptible to abandonment for the reasons described in the Architectural Design Statement.

The Heritage Council agree with the stated position of Dublin City Council, as described in the planning statement (pre – app discussions), that the continued use of the hospital building by the HSE would be welcome, and/or its future use is not compromised by the development.

The Heritage Council does not necessarily fully agree with the statement in the Architectural Design Statement that the best way to protect and preserve this architecturally important protected structure is to not use it as a healthcare facility. Whilst construction efficiencies, and health and safety standards may mean that healthcare facilities may be more readily achievable on a new build site, conservation through use is often the best way to protect and preserve buildings of historic merit over the long term. Although conservation and reuse are more difficult, ultimately it is a more sustainable pathway i.e. the most sustainable building is the one already built.

The Heritage Council believes that the application rightly aimed to use an “All Campus Approach”, to the site, by noting the buildings cannot be separated easily. Regarding the hospital building itself, the aim, as stated, is to leave a market ready lot (Lot 1) which “would be attractive to buyers”. This does however indicate a degree of separation albeit it may be justified on financial grounds.

The Heritage Council notes the need for a primary care facility at this location and supports this. However, we would recommend that the stated ambition in the Architectural Design Statement for an all-campus approach be implemented more rigorously, insofar as the need to have a more detailed plan for Lot 1 (The Royal City of Dublin Hospital). This should have been advanced more before the preparation of the planning application, and simply dividing the site into lots in order to leave Royal City of Dublin Hospital property “attractive” to buyers is not adequate. It is not clear if parts of the building were assessed for non-clinical use i.e. staff facilities or offices; while greater exploration of potential other uses would be expected with an application that professes to an “all-campus approach”. Given the issue of vacancy and dereliction in the country’s settlements, there is a special obligation for public sector organisations to ensure their assets do not fall into disrepair and that every effort to ensure the continued use of historic buildings be exhausted.

The Heritage Council recommend that Dublin City Council seek further information from the applicant that addresses the issue of the potential continued dereliction of the Royal City of Dublin Hospital. For example, central to this should be a phased plan for the remainder of the campus, with potential new uses for the protected structure provided for within a certain timeframe. There is a need to have a more advanced position on a new use for the hospital in tandem with the construction of the primary care centre. Unless

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this is fully addressed the Heritage Council continues to see the Royal City of Dublin Hospital property as a building at risk. We note that the preamble to Objective BHAO1 *Buildings at Risk* in the Dublin City Development Plan 2022-2028 states that the Council “*maintains and proactively manages the Buildings-at-Risk Register of protected structures that are considered to be endangered or to have the potential to become ‘endangered’ through neglect, decay, damage or harm*”. The Heritage Council have concerns that unless a tangible use is identified for the property, then this structure will be a key feature over the long term in the City Council’s Building at Risk register.

It is also essential in this regard that its attractiveness for purchase as a new use is not compromised by the layout of the Primary Care Centre or the parcelling of the campus into lots. This would also be relevant for the shared garden area to the rear of the protected structure. All elements of the new development need to be designed to ensure that any new use for the protected structure can comply with matters of fire certificate/means of escape, accessibility, and development management standards.

To conclude, The Heritage Council have concerns that the proposals, in the absence of any tangible new use for the Royal City of Dublin Hospital property, do not comply with policy BHA 11a - *Rehabilitation and Reuse of Existing Older Buildings* - of the Dublin City Council Development Plan 2022-2028. We also consider that the abandonment of historic buildings, indicative of this application undermines other policies and objectives of the DCC Development Plan 2022-2028, namely CA6 *Retrofitting and Reuse of Existing Buildings*; SC2 *City’s Character* and SC22 *Historical Architectural Character*. We believe that further information be provided to ensure compliance with these policies.

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