

*An Roinn  
Ealaíon, Oidhreachta agus Gaeltachta  
Department of  
Arts, Heritage and the Gaeltacht*

13<sup>th</sup> September 2011

Your Ref: PL29N.PA0024

Our Ref: SID-2011-DC-12

(please quote this reference in all related correspondence)

The Secretary,  
c/o The Strategic Infrastructure Development Section,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1

Re: An Bord Pleanála Ref. No. PL29N.PA0024 - Notice of Direct Planning Application to An Bord Pleanála in respect of a Strategic Infrastructure Development (SID) for the construction of a 392-bed in-patient plus 53 day care bed National Paediatric Hospital, to be known as The Children's Hospital of Ireland at the development site known as the Mater Misericordiae University Hospital campus, Eccles Street, Dublin 7. The site is approximately 7.2 hectares and is bounded to the south by Eccles Street (including footpaths and street surface in the public realm on Eccles Street), to the east by the Mater Private Hospital and by the rear of properties on Leo Street, to the north by the North Circular Road (including footpaths and street surface in the public realm on the North Circular Road) and to the west by Berkeley Road. The site contains protected structures, namely Nos. 30 to 38 Eccles Street and the original stone Mater Misericordiae Hospital building

A Chara,

With reference to the above proposed strategic infrastructure development, outlined below are the architectural heritage observations and recommendations of the Department of Arts, Heritage and the Gaeltacht.

The Department recognises the strategic importance of the building of the National Paediatric Hospital on a city centre site. It is cognisant of the commitment in the *Government Policy on Architecture 2009-2015* to the highest standards in the protection, conservation and maintenance of the built heritage and landscapes in its care and to promoting the adoption of these standards towards the historic built environment; and also to the commitment to ensuring the architectural quality of all buildings procured through State funding and to enhancing the importance of architectural quality as a central objective. While this proposed development must be assessed in light of its potential impact on the architectural heritage of the city of Dublin, including the impact on the setting and visual amenity of protected structures and architectural conservation areas, and on the wider city skyline, we consider that the strategic importance of the building and its overall design objectives are also issues to be assessed.

The proposed development consists of a cluster of buildings including the main block of 16 storeys rising to a height of 88.797 metres above ground level and 94.49 metres above Ordnance Datum. From the photomontages submitted as part of the application it is evident that this building would be visible on the skyline of the city from most directions and would also have a significant impact at a local level.

In making its assessment of this development application, An Bord Pleanála, should examine the proposed development against the policies and objectives of the Dublin City Development Plan 2011-2017, the Local Area Plan for the Phibsborough / Mountjoy Area 2008 and national legislation and guidance on the protection of the architectural heritage.

#### **DUBLIN CITY DEVELOPMENT PLAN 2011-2017:**

The current city development plan, adopted on 22 December 2010, contains a number of policies and objectives relevant to this development proposal and its potential impact on the architectural heritage. These policies should be taken into account when assessing these proposals. Some are highlighted below.

**Policy SC18** To protect and enhance the skyline of the inner city and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city.

**Section 16.4 Principles for Building Height in a Sustainable City** contains, among others, the following relevant principles:

**Section 16.4.1.** All high buildings must be of the highest architectural quality and should aim to have a slenderness ratio of 3:1 or more and have regard to the existing urban form, scale and character and the built heritage of the area.

**Section 16.4.2 Key Development Principles** for each area in Figure 21, the plan states the following principles relating specifically to the Phibsborough area:

- 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 views and vistas, and to ensure proposals for high buildings will have no negative local or city-wide impacts.

**Section 17.6.3** The assessment criteria for high buildings are listed and include, under urban form and spatial criteria, that all proposals for high buildings must have regard to the following, in relation to the built heritage:

- Exhibit exceptional architectural character and quality, creating a building which is of slender proportions, elegant, contemporary, stylish and in terms of form and profile, makes a positive contribution to the city skyline, city structure and topography.
- Protect important views, landmarks, prospects, roofscapes and vistas.
- Protect the built and natural heritage of the city.
- Consider the impact on the scale and quality of existing streetscapes, spaces and buildings.
- Consider the impact on protected structures, conservation areas and the architectural character and setting of existing buildings, streets and spaces of artistic, civic and historic importance.

### **Architectural Heritage:**

**Section 7.2.5.2** There are a number of protected structures on or adjacent to the site which it is the objective of the City Council to maintain and enhance. These include:

- Nos. 30-38 Eccles Street, which form part of the development site.
- Mater Misericordiae Building, also on the development site.
- Nos.39-81 Eccles Street.
- St Joseph's Church, Berkeley Road.
- Former St George's Church, Hardwicke Place.

In addition, the architectural conservation areas of Berkeley Road/ Eccles Street and Blessington Street Basin lie immediately adjacent to the site. The scale of the proposed development means that it may impact upon the setting of other protected structures and ACAs including those at O'Connell Street, Parnell Square, North Great Georges Street, Mountjoy Square and Gardiner Street.

### **PHIBSBOROUGH / MOUNTJOY LOCAL AREA PLAN 2008:**

The provisions of the Local Area Plan (LAP) for the Phibsborough / Mountjoy area are incorporated into the City Development Plan (SC07). The LAP states that *Phibsborough / Mountjoy's rich and varied architectural heritage is one of its most defining and important features. This inheritance is a unique resource, an irreplaceable expression of the history and culture of the area; it is an important asset for developing an identity for Phibsborough / Mountjoy as a city district.*

This LAP contains many policies and objectives relevant to impacts on the architectural heritage of the area and the Mater Hospital site in particular. These include:

#### ***Key Landmark Objectives:***

4. Require an architectural design to be exemplary and reflect the building's function and location; massing and scale should be assessed to avoid monolithic buildings which overpower their surroundings.
5. Ensure proposals are sensitive to local context and protect established residential amenity, historic buildings and open spaces.
6. Require an architectural design to be exemplary and reflect the building's function and location; massing and scale should be assessed to avoid monolithic buildings which overpower their setting.
7. Ensure proposals are sensitive to local context and protect established residential amenity, historic buildings and open spaces.
8. Protect important views and vistas within the LAP area and ensure proposals for tall buildings will have no negative local or city wide visual impacts, overshadowing and microclimate impacts

#### ***Key Urban Form Objectives:***

5. Consider the scale and height of new buildings in relation to their surroundings, particularly the impact of development on particular landmarks or background buildings; or strategic views.
6. Consider the three-dimensional massing and shape of new development in relation to other buildings and spaces in the area.

***Key Building Height Objectives:***

5. Ensure redevelopment sites adjoining established residential development provides [sic] building height and adequate setbacks to ensure the protection of established residential amenity.
7. Ensure that the height of new development responds to the receiving environment and make a positive contribution to the character of the area and a contribution to quality of life and regeneration of Phibsborough / Mountjoy generally.
8. Ensure that the height and massing of proposed new development does not impact negatively on the sustainable conservation of protected structures and the social and historic heritage of the areas.

***Key Heritage and Conservation Objectives:***

The LAP will encourage contemporary interventions where there is demonstrably no negative impact on the built heritage and where they would help ensure long term viability and reuse.

10. Ensure the historic context and setting is fully considered in the assessment of all new development proposals.

***Key Site Objectives for the Mater Hospital site:***

5. Ensure that all buildings of significant height are of the highest architectural standard with landmark qualities in order for the site to function as a city wide destination.
8. Ensure the preservation of the amenity of adjoining residences, business and conservation buildings with regard to such issues as overshadowing, light spillage and noise.

**Conclusion:**

In assessing this application as regards the impact on architectural heritage we recommend that the Board looks at the overall context, including the policies and objectives of Dublin City Council, the strategic importance of the development and its overall design objectives.

Should it be decided in addressing these issues to request further information or a redesign of parts or elements of the project, the Department would be available to comment on any additional or revised documentation and proposals referred to it by the Board.

Kindly forward any further information received or in the event of a decision being made a copy of same to the following address as soon as it issues:

**The Manager,  
Development Applications Unit (DAU),  
Department of Arts, Heritage and the Gaeltacht,  
Newtown Road,  
Wexford**

Alternatively, documentation associated with the above can be referred electronically to the DAU at the following address:

**manager.dau@ahg.gov.ie**

In addition, please acknowledge receipt of these observations by return.

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*Please note the changes to e-mail contact details, which take effect from Monday, 15th August 2011.*

