



Planning Ref: WEBLRD6075/25-S3

11 June 2025

Planning Section  
Dublin City Council

Dear Sir/Madam

**Re: WEBLRD6075/25-S3 - Permission Large-Scale Residential Development principally comprising Student Accommodation at this c. 0.3 Ha site at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as ‘Independent House’).**

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 welcome proposals that bring uses back to historic buildings. We are growing increasingly concerned regarding vacancy and dereliction in Irish towns, villages and cities. This unfortunate trend has been, and continues to be, a major threat to the country’s built heritage. This issue is amplified and specifically highlighted in terms of the vacancy of five landmark buildings in Dublin. These are the Royal City of Dublin Hospital at Baggot Street, The Dublin Fruit and Vegetable Market, Aldborough House, Iveagh Markets, and Independent House. The latter is the subject of this application.

The Heritage Council welcome recent announcements regarding the Fruit and Vegetable Market. We also made a submission in May 2024 with regards to a planning application involving the Royal Hospital at Baggot Street, emphasising the principle that having a pathway for a new use for such buildings should be part of an application, rather than abandonment. It is with this in mind, that we welcome the approach taken in this application, whereby a new use, in the form of student accommodation, has been considered for Independent House [RPS REF 18], and the adjacent Emerald Chambers [RPS REF 8797]. This approach integrates a “campus” type enabling development approach that is essential for schemes that involve such landmark buildings.

Therefore, while supporting the principle of this development, the Heritage Council consider the following as the key factors for this application:

**Baill na Comhairle | Council Members**

Martina Moloney (Cathaoirleach | Chairperson),  
John Burgess, Damian Downes, Michael Farrell,  
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,  
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

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1. The detailed design approach to the buildings on Middle Abbey Street i.e. Independent House and Emerald Chambers, including the printing hall which is part of the industrial heritage of the buildings.
2. The proposed new build elements to the rear, along Prince's Street North, within the context of the north inner city's built environment and the adjoining O Connell Street Architectural Conservation Area (ACA).

The key consideration for the Heritage Council is whether the interventions to achieve adapted re-use have demonstrated careful consideration and are sympathetic to the built heritage assets on site and in the surrounding environs. And therefore, do not go above and beyond what would be considered reasonable so that the interventions would not negate the overall benefits of the scheme for the historic environment.

In this regard, it is important to note that Independent House is considered a building of National Importance on the National Inventory of Architectural Heritage (NIAH), and the development site is immediately adjacent to the O Connell Street ACA. The Heritage Council, therefore, consider the following policies from the Dublin City Development Plan 2022-2028 most pertinent:

- BHA2 – Development of Protected Structures
- BHA7 – Architectural Conservation Areas

The development strategy for the site identifies four key structures that are incorporated into the new development- namely 1). Independent House, 2). Emerald Chambers, the 3) Eastern portion of the original Printing Hall and the 4). five bay Industrial façade on Prince's Street North. The remaining elements are earmarked for demolition.

The Heritage Council consider the re-use of Independent House and Emerald Chambers essential and non-negotiable. Therefore, the retention of these structures and re-use is supported.

The two story over basement brick and concrete linear building which part encloses William's Lane is earmarked for demolition. It is important to note in this case, that the Heritage Council are cognisant of the need to establish greater natural surveillance in the area, and increase active frontages, which is needed, particularly along Prince's Street North. Some such historic lanes in Dublin have been closed, due to safety concerns. The Heritage Council recognise this concern, although in comparison to other European cities the closure of such character alleys and lanes is somewhat lamentable. Therefore, the ambition to open up William's Lane is acknowledged, and whilst unfortunate, we recognise the form of enclosure provided by the linear building currently is incompatible with this.

We would recommend however that in terms of opening up this lane, there is a need to do this more effectively. Drawing Number C0175-GA-00-1002 details the ground floor landscaping arrangement. This details a terrace area fronting onto Williams Lane. However, there appears to be no openings onto this terrace from the student amenity lounge (Drawing Number P1010 P02), which undermines the attempt to create a more open area with natural surveillance. Therefore, we recommend that door access be provided onto this terrace to achieve a more active street front.

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The Heritage Council also believe that the Printing Hall has an important industrial character, and its complete removal would be unacceptable. We agree that its spatial quality can be re-used, while we also agree that the remnants of the original service and vehicular entrances on Princes Street North contribute significantly to the character of this street. By retaining this, and ensuring more active frontage is established, there will be an enhancement in this area of the O Connell Street Architectural Conservation Area, and most importantly the overall setting of the urban environment surrounding the GPO.

It is important to acknowledge that the demolition of part of the printing hall and the sawtooth profile of the office/warehouse building will have a negative impact on the industrial heritage of the site. While the enclosure provided to William's Lane by the over basement brick linear building will now be completely removed.

In addition, a townscape block rather than a single taller landmark building is more suitable in this case. However, while the height of the new build elements to the rear along Prince's Street North are not imposing at near/street level views, there is an impact on the skyline when viewed from different parts of the inner city i.e. from Anglesea Street (VVM5 in the photomontages provided).

However, the benefits of bringing active uses to the nationally significant Independent House, and Emerald Chambers, the interventions to which are generally acceptable, will have a positive benefit to the north inner city, on one of its most prominent streets. The Heritage Council believe that there is an urgency to bring back into use the landmark buildings noted in the opening paragraph and therefore support the principle of the application. However, it is essential that such efforts to bring back into use set best practice and can serve as an exemplar to others.

Dublin City Council will need to consider if the proposed benefits of the scheme are not outweighed by the demolition proposals, and therefore negatively impact on the heritage of the area. In doing so, the Heritage Council suggest the following improvements and recommended conditions:

#### Improvements/ Further Information

- Amend ground floor plan(s) to ensure that there are door openings onto the terrace area from the "Student Amenity Lounge" adjacent to William Lane.

#### Suggested conditions:

- Signage, street furniture, building and space naming should hark back to the industrial heritage of the site, where conservation by record could be integrated into the spaces within the building, therefore given a strong interpretation to residents in the form of character of place.
- There is a need for public realm improvements, with Dublin City Council involved, for Prince's Street North, and a condition for the developer to work with Dublin City Council in specific areas (as per the 'taking in charge' plan) should be included. This in time should address issues of public realm, roller shutter prevalence, lack of soft landscaping and access to the car park at the punctuation point of the street.

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I trust these views will inform Dublin City Council's determination of this application.

Yours sincerely

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**Virginia Teehan**

**Chief Executive Officer**

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