



18 July 2025

Director of Economic Development,
Waterford City & County Council,
35 The Mall,
Waterford

Dear Sir/Madam

Re: Part 8 Development at Great George's Street, Waterford - Refurbishment and Change-of-Use, of No's 3 and 4 Great George's Street & Access improvements to car parking at the rear of No's 3 and 4 Great George's Street, Waterford

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.

From the outset, it is important to note that the Heritage Council strongly advocates for the re-use of historic buildings, both designated and non-designated. 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. Of particular importance in our cities are landmark and prominent buildings, whose contribution to place goes far beyond their site location boundary. In a Waterford city context, numbers 3&4 Great George's Street is one such building. When viewed alongside Dolphin House, the Port of Waterford Company Building, and the Munster and Leinster Bank Building, the property contributes significantly to the streetscape, by virtue of its dominating and expansive elevation frontage.

The building itself is a protected structure, and the entire ensemble of buildings contributes significantly to the architectural conservation areas in which they are located. Therefore, while supporting the principle of this development, we will focus on the detailed design approach to the building in terms of the refurbishment to the historic fabric, the new rooftop extension as well as archaeological and ecological matters associated with the application.

Baill na Comhairle | Council Members

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John Burgess, Damian Downes, Michael Farrell,
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,
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Architectural Heritage

The key consideration for the Heritage Council is whether the interventions to achieve adapted reuse 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.

Although the Heritage Council are aware that this involves a change of use from residential to office, we do support the refurbishment of historic buildings by adaptive re-use in a general sense, rather than the principle of the specific use in question.

In general terms the application material as submitted demonstrates a well-considered proposal overall, with good attention to detail and a thorough appraisal of the impact of the works. The Architectural Heritage Impact Assessment (AHIA) is comprehensive. There are several aspects to the works that are welcomed, including the replacement of the first-floor aluminium windows with replacement sash, to match existing, the latter of which will also be repaired where necessary.

There is an undoubted negative impact in terms of the loss of the secondary stairs. However, the Heritage Council cannot describe this as undue, and/or unjustified given the need to comply with Part M requirements on universal access.

The heat pumps are proposed with radiators, which is novel for historic buildings while being a commendable endeavour. However, in this regard, and more generally the M&E works will likely cause significant disruption to historic fabric and there is a need to ensure that the wiring runs are prepared by a contractor with experience working in such heritage buildings. Furthermore, there is also a need to allow for a full photographic survey to be sent to the Irish Architectural Archive prior to works. A condition is required to address these points, as part of any permission granted.

The most significant intervention externally is the proposed extension at roof level. The Heritage Council are of the view, that by virtue of the setback of this new extension from the street edge, within the context of a tight urban grain, that its inclusion can be accommodated without the setting and integrity of the building being compromised, particularly from near or street level views. In addition, we agree with the findings of the AHIA that the design mitigation has enabled the original historic structure to retain its legibility by ensuring that the new build element is subordinate to the existing Georgian building.

Archaeology

The Heritage Council are very aware of the presence of the City Wall along the boundary of the Jenkins Lane carpark as well as the presence of the Beach Tower to the south of the site boundary. Of primary interest is how the provision of the universal access ramps can be constructed without compromising the structural integrity of the historic city wall and the potential unearthing of surviving material. This also should be considered in terms of any rearrangement of the carpark. The Archaeological Report submitted with this application is cognisant of such matters. It is therefore essential that the recommendations for the advanced detailed design be agreed with the National

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Monument Service in advance of any works. This needs to be secured by condition to any permission granted.

Ecology

Finally, irrespective of the conservation status of bird spaces, glazing and glass structures, especially at this height, can lead to direct mortality. There is a need, therefore, to condition a requirement for glazing treatments, as alluded to in the ecological assessment, to reduce collisions. In addition, we recommend the following conditions:

- Removal of vegetation on stone walls should be kept to a minimum¹
- All works regarding vegetation removal, and stone wall removal, should be undertaken outside of the bird breeding season.

Conclusions

In general terms, the Heritage Council support this application. The architectural heritage matters appear well considered. Conditions are recommended for archaeological, and ecology matters however, to ensure that there are no undue impacts on the historic city wall and biodiversity.

I trust these views will inform Waterford City & County Council's determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

¹ <https://dnfc.net/flora-of-old-walls/>

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