



Planning Ref: WEB6013/25

10 February 2026

Planning Section
Dublin City Council

Dear Sir/Madam,

RE: DTDL LIMITED INTEND TO APPLY FOR A 10-YEAR PLANNING PERMISSION FOR DEVELOPMENT AT THE STEPHENS GREEN SHOPPING CENTRE, ST STEPHENS GREEN, DUBLIN, D02 X309. THE SITE IS BOUND BY ST STEPHENS GREEN WEST TO THE EAST, KING STREET SOUTH TO THE NORTH, GLOVERS ALLEY TO THE SOUTH (IN PART) AND MERCER STREET LOWER TO THE WEST, ON A SITE OF C. 1.4HA.

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.

Architectural Heritage Context

The Saint Stephen's Green Shopping Centre has a position of prominence in the streetscape of Dublin City Centre. Whilst not individually identified or designated as a Protected Structure in the Dublin City Development Plan 2022-2028, it is enveloped by several important heritage assets. These include:

- The National Monument ((SMR/RMP DU018-020334) of Saint Stephen's Green (also a Conservation Area in the Dublin City Development Plan 2022-2028)
- The Grafton Street Architectural Conservation Area

There are several other protected structures in the vicinity of the development site.

Landmark Status

Aside from the designated assets in the vicinity, it is also important to recognise that the current shopping centre, by virtue of a recognisable and iconic design, is now an established part of the streetscape in this part of Dublin, irrespective of any varying perceptions of the building's

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architectural merit. The landmark nature of the building has been acknowledged in the Architectural Heritage Impact Assessment (AHIA) i.e. the building's importance is based on its prominent location, rather than any architectural quality/historic significance. The Townscape and Visual Impact Assessment also notes that the structure has its "own distinctive architecture, thereby contributing significantly to the legibility of the Grafton Street environs and St Stephen's Green area." It goes on to note that the "the building achieves its visibility without great height, although the glass dome is visible along parts of Grafton Street where the rest of the building is hidden by the bends in the street."

Whilst the Heritage Council also note this landmark distinctiveness in the street, it is equally important to note that we consider the building to be of architectural interest, if not of historical architectural merit.

The building's contribution to 'place' is not modest but has been engrained in people's perception of this area of Dublin City Centre¹. Its recognisability is derived from its distinctive form and decorative detailing, as well as its position, when viewed from key approach streets, i.e. R138 as approached from Lesson Street/Baggot Street and Grafton Street. It is this relationship with the 'Green' including some of the monuments i.e. Fusiliers Arch, which gives robust definition to the area.

Within this context, the removal of the existing façade at Stephen's Green Shopping Centre and replacement with new elevational treatments is the primary concern for the Heritage Council. In this regard, the following policies from the Dublin City Council Development Plan are most relevant:

- Policy BHA9 seeks to "protect the special interest and character of all Dublin's Conservation Areas" and states that "Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness".
- Policy BHA11 seeks to "retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment".
- Policy BHA15 encourages the appropriate development of "exemplar twentieth century" buildings and structures to ensure their character is not compromised.

Section 7.0 of the AHIA in its appraisal of the proposed works appears to concentrate on the impact that the proposed new build elements will have on the proximate heritage assets, rather than a detailed discussion of how the removal of the existing façade would impact on the surrounding streetscape. The current discussion in the AHIA, particularly with regards to compliance with Policy BHA11 and Policy BHA15, is limited, and simply states "that the existing building is of no historical or architectural quality". This ignores the point that the AHIA previously made with respect to the

¹ The building demonstrates late 20th century architectural character which while not protected, contributes to the architectural diversity of the city. St Stephens Green has featured on many national landmark tourism icons as an iconic destination within the city.

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building which functions primarily as a local landmark. We reiterate our points previously made about the position of the existing building having an established relationship with the historic built heritage townscape of the area and therefore find the current demonstration of compliance with Policy BHA11 and BHA15 unsatisfactory.

Equally the Townscape and Visual Impact Assessment appears to concentrate mostly on how the proposed new replacement design will impact on the townscape, with the exception of the repeated opinion that “ a building which **detracts severely** from the character and quality of the street would be replaced by one of appreciably high design and material quality appropriate to the Principal Shopping Street Status” **Our emphasis.**

While the Heritage Council is not convinced that the current building “severely” detracts, more importantly there is a need to assess the building and its landmark status through the prism of contribution to place, something the report had previously noted due to the fine texture of the building and its three-dimensional quality. We believe this has not been done to a sufficient level.

In general terms, the Heritage Council believes that the reporting to justify the proposal has overly concentrated on the new build element, and the non-designated status of the existing property. Equally important is to view the structure as an iconic 20th century building of architectural interest and as a landmark building. This also merits full consideration regarding the aforementioned policies. Impacts on the adjacent ACAs and protected structures, and the national monument of St Stephen’s Green should be viewed within this context also.

St. Stephen’s Green National Monument/ Conservation Area

The Saint Stephen’s Green Shopping Centre is currently a terminal landmark feature connecting Grafton Street (designated ACA) to the adjoining St Stephens Green Conservation Area. The Heritage Council’s primary concern is the removal of the existing façade and therefore do not wish to lend too much commentary to the proposed replacement design. Nevertheless, our concern is amplified as we believe that the proposed replacement building presents a monolithic and uniform facade treatment, with significantly reduced articulation (in terms of materials and detailing) when compared to the existing structure.

By virtue of this ‘new’ generic appearance, we are concerned that it may challenge the setting of the National Monument of Saint Stephen’s Green. Therefore, should the proposal proceed it has the potential to disrupt the extensive historical and heritage sensitivities associated with St Stephens Green, as a National Monument, and an adopted Conservation Area in the Dublin City Council Development Plan.

St Stephens Green is one of Dublin City’s largest and earliest squares to be enclosed as a park in circa. 1664 and has been the epicentre of many historic events that elevates the site in its local, regionally, and national status. The combination of St Stephens Green and its immediate environs represent one of Dublin’s most important and sensitive historic townscapes, forming a cohesive ensemble of Georgian planned urban form, later Victorian and early twentieth century layers with the nationally significant public park at its core. The Green provides an exceptional civic setting whose openness, formality and mature planting establish long standing visual and spatial

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relationships with surrounding streets. The character of the area is not derived solely from protected structures but from cumulative contribution of the buildings, space, rhythm, detailing and landmark features that together create a coherent and highly valuable historic urban environment of national importance. This includes established non designated yet iconic 20th century buildings in the immediate area.

The National Monument at Saint Stephen's Green will encounter significant disruption with some impacts envisaged due to the construction of the Saint Stephen's Green Metro Station at the North-eastern section of the Green. Considerable construction impacts of a potentially long duration will have an impact on the national monument. A further disruption is now proposed outside the northwestern corner of the Green. Both proposals, when combined, have the potential to negatively impact on the established position of Saint Stephen's Green, and the perception of the national monument when viewed and perceived within the immediate townscape, particularly in relation to the established relationship with the surrounding buildings including those of protected status and other non-designated buildings such as the Shopping Centre.

There appears to be little to no mention of the potential cumulative impacts that this proposal would have when viewed alongside other developments, including the Metro station construction, on the National Monument, which may not be able to absorb such cumulative change in its immediate surroundings. The Heritage Council considers this unsatisfactory and therefore suggest noncompliance with **Policy BHA9** which caters for Conservation Areas, of which the National Monument of Saint Stephen's Green is one.

Conclusion

In general terms the Heritage Council is not convinced that the proposed 'rejuvenation' of the shopping centre will have a positive impact on the historic streetscape of this part of Dublin. The removal of the distinctive and prominent façade of the shopping centre, will undermine the established relationships between the buildings and spaces, both designated and non-designated in the vicinity of Saint Stephen's Green. In this regard the Heritage Council recommend to Dublin City Council that it make a distinction between architectural interest and architectural merit. Furthermore, the lack of recognition regarding cumulative impacts when viewed alongside the construction of the metro station is another reason to be concerned, as well as the carbon losses associated with such a proposal. The Heritage Council therefore cannot support the proposal and recommend refusal.

I trust these views will inform Dublin City Council's view of the application.

Yours sincerely,

Ian Doyle
Head of Conservation

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