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Dáil Éireann
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An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

22 May, 2026

Re: An Coimisiún Pleanála Case Reference: PL29S.501223
Planning Authority Reference Number: WEB6013/25
10 year Planning Permission for Development at the Stephen's Green Shopping Centre, St. Stephen's Green, Dublin 2, D02 X309.

I am writing as the TD for the constituency of Dublin Bay South and on behalf of my constituents to lodge an observation with An Coimisiún Pleanála with respect to plans submitted for the redevelopment of Stephen's Green Shopping Centre, which is located in my constituency.

The Importance of the St. Stephen's Green Area

While St. Stephen's Green and the adjacent shopping centre are part of a centre of the capital and play an important part of the national consciousness, they are also part of the local fabric for Dubliners and local residents in Dublin 2. It is important to note that St. Stephen's Green, a National Monument, was gifted to the City of Dublin by the Guinness family and ever since has been a valued part of our capital city's landscape.



St. Stephen's Green is a historic designed landscape of national importance, whose character depends on the coherence of its surrounding built form. The proposed introduction of a visually dominant frontage, and weakening the sense of enclosure, would redefine the Green. While the planning authority in Dublin City Council has relied on verified views to conclude that impacts are acceptable, it is widely recognised that such images cannot fully convey the cumulative and experiential effects of development in real urban conditions. As has been pointed out in independent analysis, the scale of the proposal becomes particularly evident when viewed in relation to key reference points such as the Green itself and surrounding landmarks. The question is therefore whether the development enhances the setting of this nationally important space. That has not been clearly demonstrated, in my view.

Stephen's Green Shopping Centre as an Iconic Landmark in the National Fabric

In the 1980s, the site adjacent to St. Stephen's Green on which the Shopping Centre stands was developed into its building today. Since its development, Stephen's Green Shopping Centre has been an iconic landmark in the hearts of Dubliners, their city, and the nation, and it should remain so.

As a TD representing the local constituency, I have been inundated from constituents via email and on the street about how important this building is to them. So many have stories about their earliest memories of the city centre being about this building, as it does for me. Stephen's Green Shopping Centre plays an outsized role in the minds and memories of so many people across the country, leading it to be a building, in my view as a member of Dáil Éireann, of national public importance.

The Building's Current Importance to Dublin

The building's current design and architecture is distinctive, in the Stephen's Green area and city centre, but also in the skyline of Dublin. Its neo-Victorian style is unique and has captured an aesthetic that is unique to the city. That should not be disregarded.



The centre is also operational as an important shopping venue for locals and for visitors to the city, housing many retailers of importance to the local area. Indeed, as someone who works in the city centre, I have often found what I needed in this shopping centre as opposed to other places, and I would hope that might continue for me and my fellow Dubliners. It is important that this key shopping service remains available to Dubliners into the future.

But shopping centres like this one are not merely retail location spaces. It provides valuable other facilities for locals and visitors to the city centre. I doubt there is anyone in Ireland who has spent any time in this part of Dublin that has not frequented the public toilets available at the top of the centre, a service that is badly needed in Dublin's city centre and for which the local authority has not made sufficient provision locally. It plays a key location as a cultural space - not just in the plaza in front of it, where buskers play nearly every day, including the annual Christmas Eve celebrations from renowned international musicians - but also as a venue for important cultural retailers including artists and independent retailers. I have severe reservations that if proposed redesigns, which seem to prioritise profitability of the site above all else, go forward, these kinds of spaces may be lost and may not return, or be irrevocably diminished if they do.

The Centre as an Attraction

I recently visited the centre for a few hours, and one thing in particular stood out to me as I stood at the top levels of the centre: the amount of tourists taking pictures of the space. I am not exaggerating that there were dozens of photos taken every few minutes - the stairwell in particular had a mini-queue of people waiting to take a photo of the architecture from the most perceptive location.

Tourism is not necessarily the most important thing that happens in Dublin, but it is a key part of our city's life, and provides important employment opportunities for locals. The growing trend of developing hotel spaces and office blocks seems to prioritise the commercial aspects of the city and deprioritise the things that make Dublin liveable, beautiful and - critically - attractive to tourists. But if that trend continues unabated, and if



no planning permission restrictions curb it, it is possible we end up with a Dublin that has been designed for profits at the expense of anything worth coming to the city for. Retail, gastronomy, and tourist activity have experienced downturns in Dublin over the last number of years - surely part of the role of the local authority, planning, and indeed our national planning authority is to ensure development is balanced so that our capital can thrive beyond the mere profitability of a site.

The existing building, while not protected, has acquired a recognised presence in the city. Its façade, dome and atrium contribute to its identity and role as a landmark. The Heritage Council and other observers have highlighted that such buildings can make a meaningful contribution to townscape character and public life even without formal designation. In particular, the atrium provides a significant indoor public space — a function that is not easily replaced. The proposal seeks to substitute these qualities with a canopy, seating and external public realm interventions. The planning authority in Dublin City Council has concluded that these elements provide a comparable public benefit. I do not agree. This is not an equivalent exchange. A canopy and forecourt cannot replicate the spatial quality, weather protection, or social function of an enclosed civic space of this scale.

Redevelopment Concerns - Carbon Emissions Impact

It has long been established as part of the public discourse and public decisions, including by the local authority, that any rehabilitating or renovating of an existing structure is much more environmentally advantageous than demolishing and rebuilding something on the same site. Indeed, the local authority has made that exact argument in many of its own planning decisions, including its recent decision to repurpose its own offices on Wood Quay for alternative uses, including possible site for public housing.

One of the core climate issues in the demolition of a building and reconstructing a new one is the carbon footprint associated with such an action. The use of brand new building materials, especially non-domestic ones, has a very significant carbon emission impact, as does the disposal of demolished materials. Of course, in some instances, that may be required and necessary, but in this particular instance, it seems indulgent. Indeed, I would



go so far as to say it goes against the spirit, if not the letter, of the government's climate action plans and goals. This must be a consideration for any planning decision.

Additionally, from a climate action perspective, the proposal retains a substantial level of car parking in a highly accessible city-centre location. This raises questions about consistency with: sustainable transport policy, climate objectives, and efforts to reduce car dependency in the city centre.

Furthermore, the scheme is described as a “rejuvenation” of the existing shopping centre. In practice, it constitutes a substantial redevelopment involving extensive demolition, a significant increase in scale, and the introduction of multiple storeys of office accommodation above a reduced retail base. The proposal should therefore be assessed as a major redevelopment.

Issues in the Centre and the Proposed Redesign

The proposed redevelopment of the Centre is not without any argument, I must admit, but it is critical to recognise these can be dealt with in other ways beyond the total destruction and redevelopment of the site.

Most central to my observation, the proposed redesign as it currently exists presents significant problems. Firstly, the aesthetics of the design in my opinion, the opinion of the strong majority of my constituents who have contacted me, and in the opinion of tens of thousands of petitioners, are poor. It does not have any unique qualities, nor does it add anything to the landscape. I doubt this design will retain the site as an iconic landmark in Dublin.

Furthermore, the design seems in conflict with - or at least inconsistent with - the local area, which includes a long-standing historical park, local statues to historical figures including Lord Ardilaun of the Guinness Family who gifted the Green to the City, the local Boer War monument, and other buildings of historical importance on the



circumference of St. Stephen's Green. Surely any adjudication on the appropriateness of the design should take these environs into account.

More to the point, the use of the site as a major modern-design office block location does not fit the character of the area. Corporate offices are an important part of our city's life, but the city already is experiencing a higher-than-typical vacancy rate in commercial office spaces - adding another may actually lead to additional vacancy, rather than a reinvigoration of city life so desperately needed.

The proposal introduces a substantial amount of office space, which forms the dominant element of the development. While mixed use is proposed, the balance is shifted significantly toward office use, with a reduction in the relative contribution of retail and civic functions. This raises concerns about the long-term vitality of the city centre, particularly in a location that has traditionally served a strong retail and social role. There is also no meaningful residential component proposed, despite policy support for increasing housing in central urban areas.

The Heritage Council's position is that development at such prominent locations must be of exceptional design quality and demonstrate a clear and meaningful response to context. That standard does not appear to have been met. A development of this scale would set a clear precedent and there is a risk that approving such an increase in height and mass at this location would encourage similar patterns of development elsewhere, gradually altering the character of St Stephen's Green and the surrounding historic core. This cumulative impact must be considered.

Conclusion

It is for these reasons that I strongly object to the development of this site as set out in its planning application. In a site of this importance, the standard required is clear: the outcome must represent a meaningful improvement on what exists. That case has not been made, and I urge you to agree with the appeal.



Please take these observations as a representation on behalf of my constituents. I hope you might take these views into consideration in your decision on the appeal to the planning decision for the Stephen's Green Shopping Centre site.

Please acknowledge my submission and advise of any decision made.

Yours faithfully,



Eoin Hayes TD

