

Validation Checklist



An
Bord
Pleanála

Lodgement Number : **LDG-067764-23**
Case Number: **ABP-318316-23**
Customer: **The Moore Street Preservation Trust**
Lodgement Date: **23/10/2023 12:07:00**
Validation Officer: **Dáire Littleton Caden**
PA Name: **Dublin City Council North**
PA Reg Ref: **5126 22**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Appeal**

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
3rd Party Acknowledgement	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes
Valid Lodgement Channel	Yes

BP01HM to appellant. Enclose receipt and copy of other appeal.

Copy of letter to file

Update case narrative

note for screening : Reg ref cleared with
Bronagh Seo

C.C
25/10

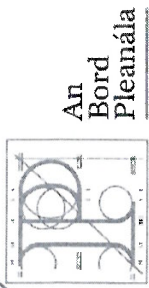
Run at: 25/10/2023 11:41

Run by: Dáire Littleton Caden

73

Lodgement Cover Sheet - LDG-067764-23

3rd party grant
multiple



PD - 017492-23

Details

Lodgement Date	23/10/2023
Customer	The Moore Street Preservation Trust
Lodgement Channel	In Person
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-067764-23
Map ID	
Created By	Aisling Litster
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

Categorisation

Lodgement Type	Appeal
Section	Processing

PA Name	Dublin City Council North
Case Type (3rd Level Category)	

5126/22

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	270
Refund Amount	0.00

Observation/Objection Allowed?	
Payment	PMT-052582-23
Related Payment Details Record	PD-052460-23

Appeal 03/10/23

40

request oral hearing

PA notified by
e-mail
BPO/MH - to
appellant
Ltr 24-10-23

31/10/23

ABP - 318316-23

Run at: 23/10/2023 12:12

Run by: Aisling Litster

PA Case Details Manual	
PA Case Number	
PA Decision	
PA Decision Date	
Lodgement Deadline	
Development Description	
Development Address	

Appeals Type	
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Moore Street Preservation Trust

Iontaobhas Caomhnaithe Sráid an Mhúraigh

Ireland Institute, The Pearse Centre, 27 Pearse St., Dublin 2

moorestpreservationtrust@gmail.com

The Secretary.
An Bord Pleanála.
64 Marlborough Street,
Dublin 1
D01 V902
20th October 2023

AN BORD PLEANÁLA	
067764-23	
LDG-	
ABP-	
23 OCT 2023	
Fee: € 270	Type: c/c
Time: 11:40	By: Hand

Re. Planning Application appeal re. 43 – 58, rear of 59-60 and 60A O'Connell Street Upper, Dublin 1.
Dublin City Council Planning Reg. Ref. No. 5126/22

A chara,

The Moore Street Preservation Trust (MSPT) is hereby appealing the decision of Dublin City Council to grant planning permission for the proposed development as described above.

Full details of the planning application, the subject of this appeal and the appellant's full details are attached. Dublin City Council's acknowledgement of the Trust's original submission during the City Council's planning process as well as the prescribed fee of €220.

As part of this submission please note that the Moore Street Preservation Trust hereby requests an oral appeal hearing. The site for the proposed development is located in an area of historical importance being central to the evacuation route and the location of the surrender of those who escaped under fire from the GPO during the Easter Rising of 1916. A national monument and protected structures are located nearby and a process to list other structures on Moore Street as Protected Structures was recently completed by Dublin City Council, rendering them protected structures. For these reasons the Trust believes an oral hearing should take place and asks An Bord Pleanála to facilitate one. It should be noted that in 2009 the Board facilitated an oral hearing for a proposed multi-storey development on another adjacent section of the developer's site. I also enclose the prescribed fee of €50 to request an oral hearing and the Trust's full grounds of appeal are attached.

I trust An Bord Pleanála will give this submission due consideration and that the Board will confirm an oral hearing as requested.

Le meas,

Mícheál Mac Donncha

Rúnaí, The Moore Street Preservation Trust.

Applicant and Appellant's details

Local Authority (L.A.)	Dublin City Council
L.A. Planning Ref. No.	Reg. Ref. 5126/22
Applicant	Dublin Central GP Ltd.
Location of proposed development	<p>PROTECTED STRUCTURE: Dublin Central GP Limited Intends to apply for Permission for a period of 11 years at a site, 'Dublin Central - Site 2' (c. 1.33 Ha), at No. 43 (a Protected Structure), No. 44 (a Protected Structure), Nos. 45 - 49, Nos. 50 - 51 O'Connell Street Upper (a vacant site), Nos. 52 - 54 (a Protected Structure), Nos. 55 - 56, No. 57 (a Protected Structure), No. 58 (a Protected Structure) and No. 60A O'Connell Street Upper and the rear of Nos. 59 - 60 O'Connell Street Upper, Dublin 1. Also, the site includes No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane) and the public realm associated with O'Rahilly Parade, Moore Lane, Henry Place and a portion of O'Connell Street Upper, Dublin 1. The site is otherwise bound by Henry Place and Nos. 59 - 60 O'Connell Street Upper to the south, the east side of Moore Lane to the west and west side of O'Connell Street Upper to the east and No. 42 O'Connell Street Upper to the north.</p>
Description of proposed development	A mixed development as described in the planning advertisement/site notices as requested by DCC at part of the clarification of further information submission
Local Authority decision	To grant planning permission
Date of decision	3 rd October 2023
Appellant's name	The Moore Street Preservation Trust (MSPT)
Appellant's address	The Ireland Institute, The Pearse Centre, 27 Pearse Street, Dublin
Appellant's contact details	moorestpreservationtrust@gmail.com
Appeal fee	The prescribed appeal fee of <u>€220.00</u> is enclosed
Local Authority acknowledgement	A copy of the letter issued by Dublin City Council in acknowledgement of the Preservation's submission during the Council's planning process is enclosed
Oral hearing request	An oral hearing has been requested as part of this submission. The additional prescribed fee of <u>€50.00</u> is enclosed





Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3,
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8

Planning & Property Development Department, Dublin City Council,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8

T: (01) 222 2288

E. planningsubmissions@dublincity.ie

Moore Street Preservation Trust
Ireland Institute
The Pearse Centre
27, Pearse Street
Dublin 2

IMPORTANT: Please retain this letter. You will be required to produce it should you wish to appeal the decision issued by the Planning Authority to An Bord Pleanála in relation to this development

PLAN NO. 5126/22

DATE RECEIVED: 26-Oct-2022

LOCATION : No. 43 (a Protected Structure), No. 44 (a Protected Structure), Nos. 45 – 49, Nos. 50 – 51 O'Connell Street Upper (a vacant site), Nos. 52 – 54 (a Protected Structure), Nos. 55 – 56, No. 57 (a Protected Structure), No. 58, (a Protected Structure) and No. 6

PROPOSAL : PROTECTED STRUCTURE: Dublin Central GP Limited Intends to apply for Permission for a period of 11 years at a site, 'Dublin Central – Site 2' (c. 1.33 Ha), at No. 43 (a Protected Structure), No. 44 (a Protected Structure), Nos. 45 – 49, Nos. 50 – 51 O'Connell Street Upper (a vacant site), Nos. 52 – 54 (a Protected Structure), Nos. 55 – 56, No. 57 (a Protected Structure), No. 58 (a Protected Structure) and No. 60A O'Connell Street Upper and the rear of Nos. 59 – 60 O'Connell Street Upper, Dublin 1. Also, the site includes No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 – 3 O'Rahilly Parade and Nos. 14 – 15 Moore Lane or Nos. 1 – 8 O'Rahilly Parade and Nos. 14 – 15 Moore Lane) and the public realm associated with O'Rahilly Parade, Moore Lane, Henry Place and a portion of O'Connell Street Upper, Dublin 1. The site is otherwise bound by Henry Place and Nos. 59 – 60 O'Connell Street Upper to the south, the east side of Moore Lane to the west and west side of O'Connell Street Upper to the east and No. 42 O'Connell Street Upper to the north.

The proposed development comprises a mixed-use scheme (c. 38,479 sq. m gross floor area) ranging in height from 2 – 8 storeys over single level basements including a new street between O'Connell Street Upper and Moore Lane, a new controlled Laneway from Moore Lane (adjacent No. 42 O'Connell Street Upper – a Protected Structure). The proposed development accommodates: - 6 no. units for use as a 'licensed restaurant / café units with takeaway / collection facility' at ground floor level (Unit 1 – c. 67 sq. m and Unit 2 – c. 244 sq. m on Moore Lane, Unit 3 – c. 178 sq. m and Unit 4 – c. 75sq. m on O'Connell Street Upper, Unit 5 – c. 58 sq. m on New Street and Unit 6 – c. 296 sq. m on Moore Lane and New Street; 1 no. unit for use as a 'licensed restaurant / café unit



with takeaway / collection facility' across basement, ground, 1st and 2nd floor (c. 878 sq. m) on O'Connell Street Upper; 8no. retail units, each for use as a 'shop' or 'licensed restaurant / café units with takeaway / collection facility' at ground floor level (Unit 1 – c. 1,041 sq. m on O'Connell Street Upper and Moore Lane, Unit 2 – c. 311 sq. m and Unit 3 – c. 260 sq. m on O'Connell Street Upper and New Street, Unit 4 – c. 452 sq. m on New Street, Unit 5 – c. 251 sq. m on Moore Lane, Unit 6 – c. 162 sq. m and Unit 7 – c. 58 sq. m on O'Connell Street Upper and Unit 8 – c. 40 sq. m on Moore Lane and new controlled Laneway); Temporary use of retail Unit 8 (c. 40 sq. m) as a delivery hub, pending the completion of same at Site 5 under DCC Reg. Ref. 2863/21; Office use (c. 33,714 sq. m) from 1st to 7th floor with access from O'Connell Street Upper, rear of No. 59 O'Connell Street upper and new plaza on Henry Place and new controlled Laneway. Terraces proposed at 1st, 3rd, 4th, 6th and 7th floor; Refurbishment of the 'Reading Room' (rear of No. 59 O'Connell Street Upper, Dublin 1) as 'licensed restaurant / café unit with takeaway / collection facility' at ground floor level and ancillary café use at basement level (c. 244 sq. m in total). The single level basement comprises: - Access ramp from Moore Lane; 32no. car parking space; 372no. bicycle parking spaces with access to secure bicycle storage areas from the new plaza on Henry Place and the new controlled laneway from Moore Lane; Plant and waste storage areas; A structural box (120m length, 26m width, 34.5m depth) beneath the ground floor level that has been designed to accommodate the independent construction and operation of the planned O'Connell Street MetroLink Station by Transport Infrastructure Ireland, including provision of the structural envelope and co-ordinated voids to accommodate station entrances, ventilation and fire escape shafts through this part of the Dublin Central proposed development. These ensure that the Dublin Central proposed development is structurally independent of, and not prejudicial to, the MetroLink project. The MetroLink project will be the subject of a separate application for approval to be made by Transport Infrastructure Ireland. This part of the Dublin Central proposed development is referred to as the MetroLink Enabling Works; All associated and ancillary site development, conservation, demolition, landscaping and temporary works, including: - Conservation, repair, refurbishment and adaptive reuse of part of the existing building fabric, including: - Retention of part of the rear of No. 59 O'Connell Street Upper (known as the 'Reading Room') internal and external modifications and new shopfronts; Retention of the facades of Nos. 57 – 58 O'Connell Street Upper (Protected Structures); Retention of the facades of Nos. 52 – 54 O'Connell Street Upper (Carlton Cinema – Protected Structures) including the reinstatement of the canopies; Retention of the facades of Nos. 43 – 44 O'Connell Street Upper (Protected Structures); Retention of the facade of No. 45 O'Connell Street Upper; Works to include repair and upgrade works (where required)





of retained masonry, external and internal joinery, plasterwork and features of significance; Conservation and repair of existing lightwells on O'Connell Street Upper; Demolition of all other existing buildings and structures on site (c. 22,521 sq. m) including No. 13 Moore Lane and No. 14 Moore Lane (otherwise known as Nos. 1 – 3 O'Rahilly Parade and Nos. 14 – 15 Moore Lane or Nos. 1 – 8 O'Rahilly Parade and Nos. 14 – 15 Moore Lane) to facilitate a temporary construction compound; Laying of services in Parnell Street westwards from Moore Lane for approximately 49 metres; Improvement works to the public realm on O'Rahilly Parade, Moore Lane and Henry Place, including the provision of a new entrance off O'Connell Street Upper for deliveries / emergency access. There are also adjustments and improvement works proposed at the junctions of Moore Street with Henry Place and with O'Rahilly Parade; Creation of a new street connecting O'Connell Street Upper with Moore Lane and provision of a new plaza at the junction of Moore Lane and Henry Place; 3no. telecommunication lattice towers which can accommodate 3no. 800mm antenna and 2no. 300mm microwave link dishes with associated equipment on the building rooftop in Site 2C; 2no. ESB sub-stations; Building signage zones and retractable canopies. The application site is within the O'Connell Street Architectural Conservation Area. An Environmental Impact Assessment Report (EIAR) accompanies this application.

Note: Submissions/Observations may be made on line at:

<https://www.dublincity.ie/residential/planning/planning-applications/object-or-support-planning-application>

To Whom It May Concern,

The Planning Authority wishes to acknowledge receipt of your **submission/observation** in connection with the above planning application. It should be noted that the Dublin City Council as the Planning Authority will consider this application strictly in accordance with the provisions of the Dublin City Development Plan. The contents of your submission/observation will be considered by the **Case Officer** during the assessment of the above application, and you will be notified of the decision in due course.

- All queries should be submitted to the e mail address shown above.
- Please note that a request for Further Information or Clarification of Further information is not a decision.
- **You will not be notified**, if Further Information or Clarification of Further information is requested by the Planning Authority.



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3,
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8

Planning & Property Development Department, Dublin City Council,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8

T: (01) 222 2288

E. planningsubmissions@dublincity.ie

Please also note that a weekly list of current planning applications and decisions is available for inspection at the planning public counter.

Opening Hours 9 a.m. - 4.30 p.m. Monday to Friday (inclusive of lunchtime)

A weekly list of planning applications and decisions is available for inspection at all Dublin City Council Libraries & on **Dublin City Council's website**. www.dublincity.ie.

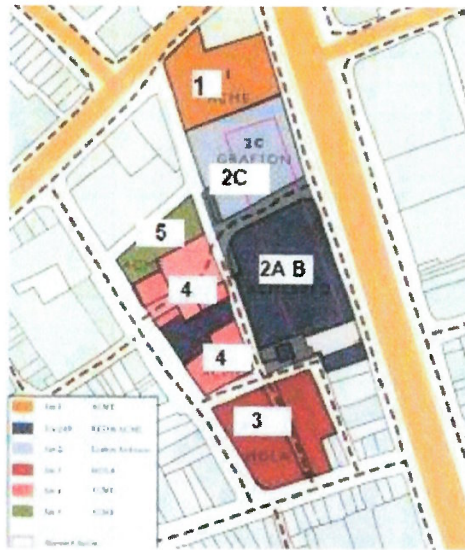
Yours faithfully,


For ADMINISTRATIVE OFFICER

GROUND OFS OF APPEAL



Submitted by:
Moore Street Preservation Trust
The Ireland Institute
The Pearse Centre
27 Pearse Street
Dublin 2.
D02 K037



Hammerson/Dublin Central GP sites from the applicant's submission

Location

This planning application forms part of a number of sites in the vicinity for which Hammerson/Dublin Central GP have or intend applying for planning permission for development. This application refers to Site 2AB and 2C on the map above, addressing O'Connell Street Upper and overlooking Moore Lane, Sites 3, 4 and 5 as well as the National Monument at 14-17 Moore Street.

Proposed development

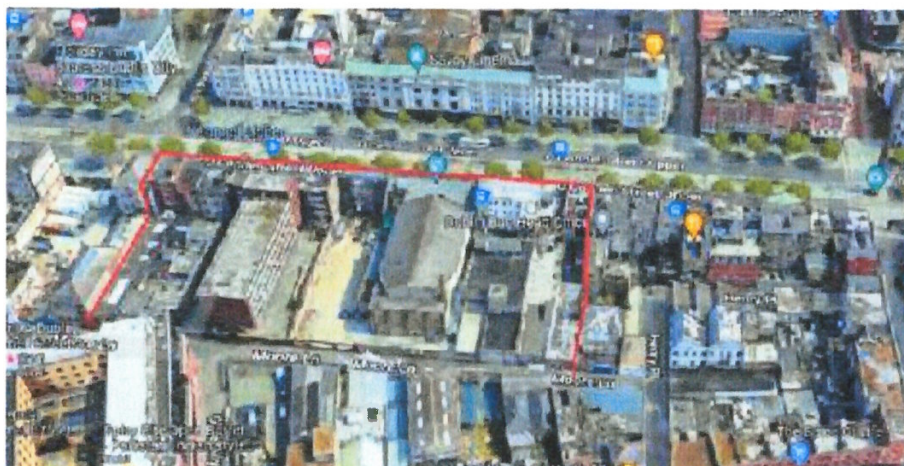
The proposed development comprises:

- A mixed-use scheme ranging in height from 2 – 8 storeys over single level basements
- A new street between O'Connell Street Upper and Moore Lane
- A new controlled laneway from Moore Lane (adjacent No. 42 O'Connell Street Upper – a Protected Structure).

The proposed development accommodates:

- 6 no. units for use as a 'licensed restaurant / café units with takeaway / collection facility' at ground floor level
- 1 no. unit for use as a 'licensed restaurant / café unit with takeaway / collection facility' across basement, ground, 1st and 2nd floor on O'Connell Street Upper;
- 8 no. retail units, each for use as a 'shop' or 'licensed restaurant / café units with takeaway / collection facility' at ground floor level on Moore Lane and new controlled Laneway;
- Temporary use of retail Unit 8 as a delivery hub, pending the completion of same at Site 5 under DCC Reg. Ref. 2863/21 now under appeal to An Bord Pleanála;
- Office use from 1st to 7th floor with access from O'Connell Street Upper, rear of No. 59 O'Connell Street upper and new plaza on Henry Place and new controlled Laneway. Terraces proposed at 1st, 3rd, 4th, 6th and 7th floor;
- Refurbishment of the 'Reading Room' (rear of No. 59 O'Connell Street Upper, Dublin 1) as 'licensed restaurant / café unit with takeaway / collection facility' at ground floor level and ancillary café use at basement level (c. 244 sq. m in total).
- The single level basement comprises: - Access ramp from Moore Lane; 32no. car parking space; 372 no. bicycle parking spaces with access to secure bicycle storage areas from the new plaza on Henry Place and the new controlled laneway from Moore Lane;

- Plant and waste storage areas and 2 ESB substations
- A structural box (120m length, 26m width, 34.5m depth) beneath the ground floor level that has been designed to accommodate the independent construction and operation of the planned O'Connell Street Metro Link Station by Transport Infrastructure Ireland, including provision of the structural envelope and co-ordinated voids to accommodate station entrances, ventilation and fire escape shafts through this part of the Dublin Central proposed development.
- All associated and ancillary site development, conservation, demolition, landscaping and temporary works, including: - Conservation, repair, refurbishment and adaptive reuse of part of the existing building fabric, including: - Retention of part of the rear of No. 59 O'Connell Street Upper (known as the 'Reading Room') internal and external modifications and new shopfronts;
- Retention of the facades of Nos. 57 – 58 O'Connell Street Upper (Protected Structures); Retention of the facades of Nos. 52 – 54 O'Connell Street Upper (Carlton Cinema – Protected Structures) including the reinstatement of the canopies;
- Retention of the facades of Nos. 43 – 44 O'Connell Street Upper (Protected Structures);
- Retention of the facade of No. 45 O'Connell Street Upper; Works to include repair and upgrade works (where required) of retained masonry, external and internal joinery, plasterwork and features of significance;
- Conservation and repair of existing light wells on O'Connell Street Upper;
- Demolition of all other existing buildings and structures on site (c. 22,521 sq. m) including No. 13 Moore Lane and No. 14 Moore Lane (otherwise known as Nos. 1 – 3 O'Rahilly Parade and Nos. 14 – 15 Moore Lane or Nos. 1 – 8 O'Rahilly Parade and Nos. 14 – 15 Moore Lane) to facilitate a temporary construction compound;
- Laying of services in Parnell Street westwards from Moore Lane for approximately 49 metres;
- Improvement works to the public realm on O'Rahilly Parade, Moore Lane and Henry Place, including the provision of a new entrance off O'Connell Street Upper for deliveries / emergency access.
- There are also adjustments and improvement works proposed at the junctions of Moore Street with Henry Place and with O'Rahilly Parade;
- Creation of a new street connecting O'Connell Street Upper with Moore Lane and provision of a new plaza at the junction of Moore Lane and Henry Place;
- 3no. telecommunication lattice towers which can accommodate 3no. 800mm antenna and 2no. 300mm microwave link dishes with associated equipment on the building rooftop in Site 2



Birdseye view of the main sites relevant to this application

Background

This site adjoins a number of sites in the vicinity of Moore Street, all owned by Hammerson (Dublin Central GP) which have been the subject of previous planning applications, preservation orders, protected structures and legal challenges. The historical importance of these sites is explained in Appendix A.

An Bord Pleanála is currently considering appeals concerning four adjoining sites to the west and south of this particular site.

To the west of this site, Nos. 14 - 17 Moore Street were made subject to a Preservation Order under the National Monuments Act by the relevant Minister (Dick Roche TD) in 2007. The Easter Rising surrender decision was made in No. 16 Moore Street by the 1916 Leaders. Nos. 14 - 17 are a continuous set of complete pre-1916 buildings with evidence of the presence of the insurgents.

The State acquired Nos. 14 - 17 (and part of No.18, the façade of which was recently added to the Record of Protected Structures) in mid-2015 when all other proposals to restore the buildings had failed. Until then the site had been owned by a private development company (Chartered Land) as part of a wider property portfolio in the area. The acquisition was facilitated by NAMA as the buildings were under lien to them at the time.

Following an independent Value for Money and Process Audit, the Department then took up a tender process that had been initiated by the previous owners (Chartered Land) for the conservation and restoration of the buildings at 14-17 Moore Street as a 1916 Commemorative Centre.

The intention was to have the Commemorative Centre open in time for the 1916 Centenary. However, legal proceedings to stop the 1916 Commemorative Centre project were initiated against the State in the High Court by a private citizen in late 2015. At the same time the buildings were occupied by protestors opposed to the State's project which included demolishing adjoining buildings which the State contended were post 1916.

The High Court held on 18 March 2016 that the works were not compliant with national monuments or planning legislation and went on to find that extensive areas of Moore Street and surrounds were national monuments as had been sought by the applicant in the proceedings.

This effectively stopped all works on the site, other than essential stabilisation and preservation works which were carried out with the full agreement of the High Court. The buildings are in the care of OPW ever since.

On 14 February 2018 the Court of Appeal overturned the High Court judgments against the Minister in all respects and essentially reaffirmed that the power to determine what constituted a National Monument was a policy matter vested in the Minister and that the Minister did not require planning permission for works on National Monument sites. Securing History which was published in March 2017 was drafted against a background of ongoing legal proceedings which also created a context of some uncertainty over the deliberations of the MSAG until the Court of Appeal judgement was announced in February.

The overall area is an historic area being the route of the retreat from the GPO in 1916. For this reason many sites in the area have been subject to objection, appeals and legal cases.

The planning process

The overall Hammerson development project site has been subdivided by the developers into six different sites (1, 2AB, 2C, 3, 4 and 5) with various design teams making planning submissions. This current planning application submitted comprises the Sites 2AB and 2C.

The applications as lodged contain a high quantity of information which has been difficult to take on board as the overall development site, as stated, has been subdivided. In essence this development is one extremely large development and it is unfair that the submissions, which are very much related, have been subdivided in this manner. A large development project site cannot be assessed in such a piecemeal fashion with a proposed new public plaza to the west and a proposed new street within this application shown subdivided across three planning applications.

A number of pre-planning meetings took place between the applicant and Dublin City Council (DCC) concerning the proposed development, so DCC is aware of the Hammerson/Dublin Central GP plans for the overall project across all sites. However it is grossly unfair that the citizens of Dublin cannot visualise the overall project for such a major development in the city centre. Once again no scaled model was initially submitted with this particular application and, as in a previous application, the Moore Street Preservation Trust asked Dublin City Council to request, as Additional Information, that a full scaled model be submitted by the applicants to be put on public display at the Council's Planning Offices. While a scaled model was eventually submitted, no reference was made to the scaled model in the Site Notices or Newspaper Advertisement submitted as part of the request for Significant Further Information. The public was unaware of the existence of the scaled model, and yet DCC continued to consider the application and made its decision without acknowledging its serious error.

At this point it is important to highlight that the Moore Street Preservation Trust has grave concerns regarding the then Taoiseach Mícheál Martin's supportive comments for the proposed overall Hammerson/Dublin Central GP development which were included in the press release issued by the developer in support of their applications submitted to the Council in June 2021. In addition there are grave concerns that the Minister for Housing, Darragh O'Brien, has confirmed that his department was indirectly engaged at the same time in some discussions regarding compensation for the street traders from public funds.

Proposed duration of planning permission

The application sought planning permission of 11 years duration for the proposed development. This is unnecessary and inappropriate for a development on the city's main street and within such an historic area. The Council previously refused to grant planning permission for a duration of 7 years for a previous application (Reg. Ref. 2861/21) and yet in this case DCC believes that a Planning Permission duration of 11 years is considered reasonable for this application while recommending that the applicant ensures that the impact of a vacant site on the streetscape is "kept to a minimum". DCC is ensuring Dublin's main street will remain an eyesore for a further 11 years should the development proceed and its vague recommendation that the impact of a vacant site on the streetscape be 'kept to a minimum' is meaningless. The MSPT asks ABP to refuse to grant such a planning permission.

Ownership of sites

It is noted that Dublin City Council have provided two letters of consent to the developer as part of this application. These letters refer to laneways and pavements in the locality, right up to the junctions with Moore Street and Nos. 1-3 O'Rahilly Parade and Nos.14-15 Moore Lane.

As stated the Council engaged in pre-planning meetings with the applicant and naturally now finds itself in the role of having an interest in the application while adjudicating on that same application. This is extremely unfair and it is noted here, for future reference, that this is a conflict of interest.

Other letters of consent have been submitted on behalf of the Office of Public Works (OPW) and Coras Impoir Éireann (CIE). Citizens objecting to these planning applications now see Hammerson being supported by the government, Dublin City Council, the OPW and CIE. This is inappropriate and unfair to citizens and the Trust notes this unfairness in the planning system, again for future reference.

Demolition and Climate Change

The demolition and clearance of sections of buildings ignores the historical implications of such buildings in the area. These buildings and laneways were part of the retreat route from the GPO in 1916 and this has been totally ignored in this planning application.

Remaining 1916 elements identified in the Myles Battlefield Report are being put at risk should this application be granted planning permission. The inclusion of the laneways with the approval of the City Council is baffling, as the Council should be protective of these laneways of history.

Dublin City Council's approach to demolishing buildings in Central Dublin has rightly changed in recent times. The Council will now block developers from demolishing buildings in central Dublin in a new citywide response to climate change rules. This approach to blocking demolition relies on the terms set out in the Dublin City Development Plan 2022-28.

If the council is to now impose stricter rules around what structures can be demolished to help the city mitigate the effect of development on climate change, this approach should be pursued when considering applications such as this and other applications in the vicinity. While on the one hand DCC is encouraging developers to retrofit rather than demolish, in a bid to reduce carbon emissions, it is at the same time meeting, encouraging and agreeing project details with a developer who is doing the exact opposite on a number of prime historic city centre sites.

The MSPT asks ABP to ensure that the Council's own policy is adhered to and to refuse the unnecessary demolitions of city centre buildings.

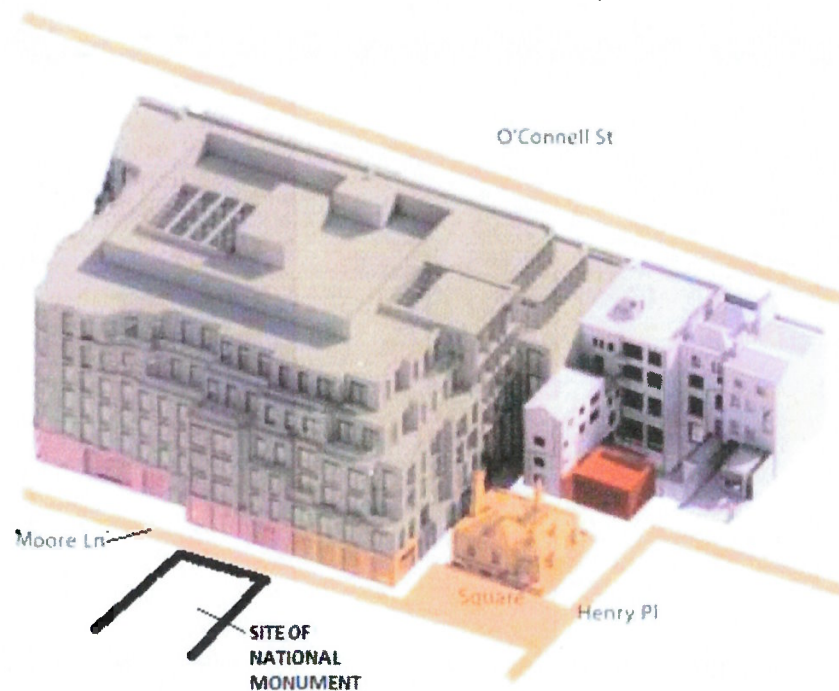
Protected structures

The site is located within the O'Connell Street Architectural Conservation Area and overlooks the National Monument at 14-17 Moore Street.

The Trust has serious concerns around the proposed building works to take place on or in the vicinity of the Protected Structures at Nos. 43, 44, 52- 54, 57 and 58 O'Connell Street Upper. In particular the creation of the new street will have a detrimental impact on the Protected Structures. While the facades of 43-45 O'Connell St. Upper are retained, the new stone façade proposed between No. 45 and the proposed new street is inappropriate. The Trust requests ABP to refuse planning permission for such inappropriate building works to and interference with Protected Structures.

Impact on the National Monument

The National Monument at 14-17 Moore Street is located to the west of this proposed development. In conjunction with the development of other sites in the vicinity this application will impact on structures located within the National Monument boundary (14-17 Moore St).



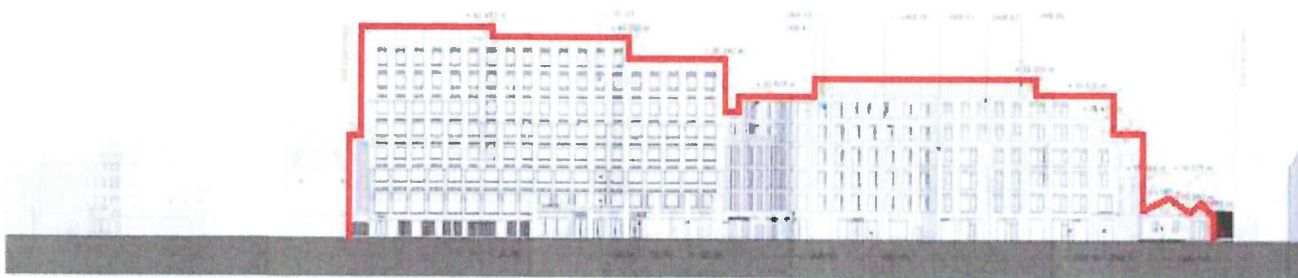
The 3-D graphic highlighting the inappropriate scale of the development onto Moore Lane

Most importantly the scale of the proposed development, as can be seen in the applicant's graphic above, is totally inappropriate for such an historical location, dwarfing the National Monument buildings and the Moore Street streetscape.

Archaeological impact

As part of the overall lands owned Hammerson/Dublin Central GP lies partially within the protected Zone of Archaeological Potential (ZAP) for Dublin a full archaeological dig should take place across all sites i.e. Site 1, Site 2AB, Site 2C, Site 3, Site 4 and Site 5. As referred to above, it is also noteworthy that this particular application site is located within the O'Connell Street Architectural Conservation Area (ACA). All new development in each ACA should be implemented and carried out in accordance with the policies/objectives outlined for each ACA and the Trust believes that the proposed development does not adhere to those policies and objectives.

Scale of proposed development



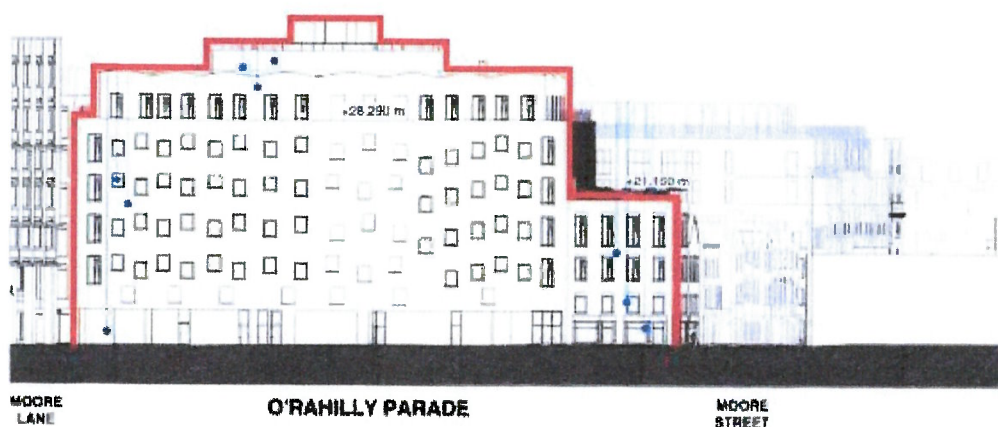
The red line highlights the proposed scale of the development which overlooks the National Monument at 14-17 Moore St and which adjoins the laneway at Moore Lane. The scale of development is wholly inappropriate for the location.



The above elevational drawing shows the streetscape facing O'Connell St. to the front of the site. The proposed development dominating the skyline can be seen to the rear of the O'Connell St. facades.

The scale of this proposed development along with the proposed design of the developments on the other Hammerson/Dublin Central GP sites ignores the existing scale of adjoining buildings in the locality.

Site 2AB is predominantly 6 stories in height and such a scale is totally inappropriate for Moore Lane and Henry Place and the lower terraced block on Moore Street. This is clearly visible in the graphic above. Site 2C (north of the proposed new street) ranges from 4 to an extremely high 8 storeys in height. Once again the scale is wholly inappropriate for the locality, particular where overlooking the buildings on Moore Lane and Moore Street to the rear.



The inappropriate scale of the proposed development facing onto O'Rahilly Parade can be seen above

Little consideration has been given to this fact and should the Council permit an 8 storey development it will be ignoring its very own designation of the area. With a National Monument of historical importance beside this site, it is clear that little consideration has been given to the existing scale of buildings in the locality. The Trust asks ABP to refuse permission for this development which will tower over the buildings on Moore Lane and Moore Street.



Figure 1: A line graph showing a step-like increase in a value over time.

The graph shows a step-like increase in the value of the function over time. The x-axis represents time, and the y-axis represents the value of the function. The function starts at a low value, remains flat for a short period, then rises sharply in a series of steps, reaching a plateau at the end.

3.1. The graph of the function $f(x)$ is shown in Figure 1. The function is defined on the interval $[0, 1]$.

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Figure 2: A line graph showing a step-like increase in a value over time.

The graph shows a step-like increase in the value of the function over time. The x-axis represents time, and the y-axis represents the value of the function. The function starts at a low value, remains flat for a short period, then rises sharply in a series of steps, reaching a plateau at the end.

Density of development

The proposed development comprises a mixed-use scheme of c. 38,479 sq. m. gross floor area on a site of 1.33ha (13,300 sq.m.). This constitutes over development and in conjunction with the other planning applications lodged by the applicant the overall density of the development within a Conservation area constitutes gross over development. The proposed eight storey height of the development contributes strongly to this over density. The Trust asks ABP such a dense development.

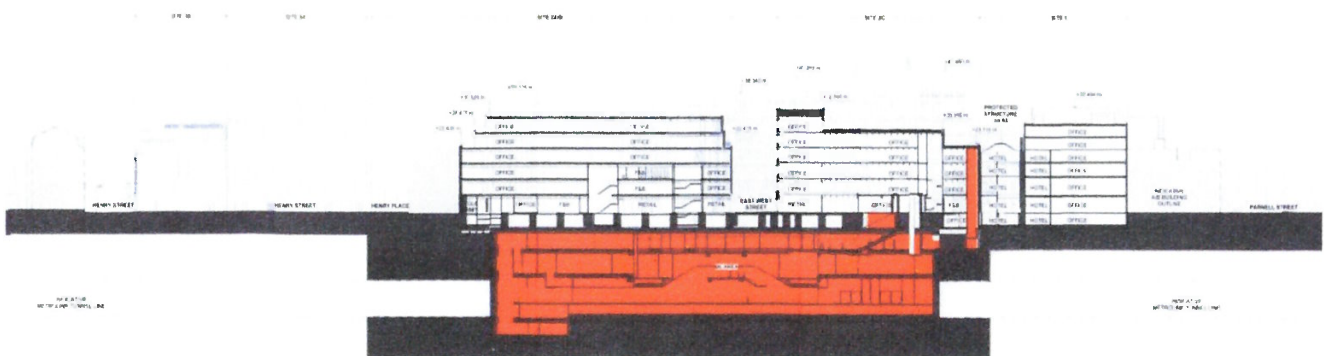
Traffic

No comprehensive up to date Traffic Management Plan for the locality, encompassing all the sites owned by Hammerson/Dublin Central GP. The Moore Street Preservation Trust asks ABP to ensure such a comprehensive traffic survey and management plan for the locality is submitted to the Board.

Metro

The application includes an allowance for the future development of a Metro rail system. As the citizens of Dublin are only all too aware, the Metro project may never take place and the applicant has provided little detail concerning the position of this section of the development should the Metro not be constructed.

The structural box (120m length, 26m width, 34.5m depth) proposed beneath the ground floor level in this application, designed to accommodate the independent construction and operation of the planned O'Connell Street MetroLink, has been referred to with little detail provided. It is unclear as to why the applicant has included it in this application knowing the Metro may never proceed. ABP should request clarity and detail concerning this section of the development.



From the applicant's submission

Again as can be seen from the graphic above, the Metro, although underground, is a proposed large scale development in itself and the implications of the project not proceeding have not been addressed by the applicant.

The MSPT has concerns that the applicant's suggestion that there would be no stand-down periods while the site will be vacant, awaiting the Metro enabling works to proceed. The applicant has relied on correspondence from the Transport Infrastructure Ireland (TII) but the TII has an obvious interest in supporting the applicant's application. There is little doubt that the methodology and programme of demolition and excavation works is merely aspirational and DCC cannot ensure its validity. As previously

The first part of the paper is devoted to the study of the properties of the function $f(x)$ defined by the equation $f(x) = \int_0^x f(t) dt$. It is shown that $f(x)$ is a constant function, and its value is determined by the initial condition $f(0) = 1$. The second part of the paper is devoted to the study of the properties of the function $g(x)$ defined by the equation $g(x) = \int_0^x g(t) dt$. It is shown that $g(x)$ is a constant function, and its value is determined by the initial condition $g(0) = 1$.

The third part of the paper is devoted to the study of the properties of the function $h(x)$ defined by the equation $h(x) = \int_0^x h(t) dt$. It is shown that $h(x)$ is a constant function, and its value is determined by the initial condition $h(0) = 1$. The fourth part of the paper is devoted to the study of the properties of the function $k(x)$ defined by the equation $k(x) = \int_0^x k(t) dt$. It is shown that $k(x)$ is a constant function, and its value is determined by the initial condition $k(0) = 1$.

The fifth part of the paper is devoted to the study of the properties of the function $l(x)$ defined by the equation $l(x) = \int_0^x l(t) dt$. It is shown that $l(x)$ is a constant function, and its value is determined by the initial condition $l(0) = 1$. The sixth part of the paper is devoted to the study of the properties of the function $m(x)$ defined by the equation $m(x) = \int_0^x m(t) dt$. It is shown that $m(x)$ is a constant function, and its value is determined by the initial condition $m(0) = 1$.

The seventh part of the paper is devoted to the study of the properties of the function $n(x)$ defined by the equation $n(x) = \int_0^x n(t) dt$. It is shown that $n(x)$ is a constant function, and its value is determined by the initial condition $n(0) = 1$. The eighth part of the paper is devoted to the study of the properties of the function $o(x)$ defined by the equation $o(x) = \int_0^x o(t) dt$. It is shown that $o(x)$ is a constant function, and its value is determined by the initial condition $o(0) = 1$.



The ninth part of the paper is devoted to the study of the properties of the function $p(x)$ defined by the equation $p(x) = \int_0^x p(t) dt$. It is shown that $p(x)$ is a constant function, and its value is determined by the initial condition $p(0) = 1$. The tenth part of the paper is devoted to the study of the properties of the function $q(x)$ defined by the equation $q(x) = \int_0^x q(t) dt$. It is shown that $q(x)$ is a constant function, and its value is determined by the initial condition $q(0) = 1$.

The eleventh part of the paper is devoted to the study of the properties of the function $r(x)$ defined by the equation $r(x) = \int_0^x r(t) dt$. It is shown that $r(x)$ is a constant function, and its value is determined by the initial condition $r(0) = 1$. The twelfth part of the paper is devoted to the study of the properties of the function $s(x)$ defined by the equation $s(x) = \int_0^x s(t) dt$. It is shown that $s(x)$ is a constant function, and its value is determined by the initial condition $s(0) = 1$.

referred to the Council's support for a possible 11 year grant of planning permission is inappropriate and should be reviewed by ABP. The applicant's proposal to dress the site with a scaffolding wrap with images of the proposed development is not a solution to ensuring the impact of the vacant site on the streetscape.

The applicant's key plan submitted highlights the extent of the Metro enabling works and the construction area. The MSPT is concerned at the extent of the works and the impact on this historic quarter which is also part of an Architectural Conservation Area. The construction of a structural box which will be 120m long x 26m wide x 34.5m deep below the ground floor of the proposed development to accommodate the MetroLink building works will have a very negative impact on the locality and no timeline has been proposed for these further building works.

Pre-planning meetings between DCC and developer

While pre-planning meetings are a normal procedure as part of the planning process, the Moore Street Preservation Trust was disappointed to note that in the middle of an ongoing planning application that Dublin City Council and the Conservation Department held a "pre-planning" meeting prior to the submission of Further Significant Information with the applicant's agents on 9th March 2023. DCC further responded to the applicant on 5th May 2023 stating that it was *"generally satisfied with the revisions and recommended options put forward"*.

It was not for DCC to assist the applicant in this controversial development and to hold a meeting with the applicant during an ongoing planning application. It was wholly inappropriate and certainly not within the spirit of a fair planning law. It is extremely difficult to understand DCC's actions when the same developer is currently taking a legal action against the Council concerning matters relating to other sites in the applicant's ownership in the vicinity. The legal action is current and DCC should not be engaging with the applicant and plaintiff, Dublin Central GP Ltd. while a legal action is being taken by that same developer against DCC.

The MSPT asks ABP to take on board the unfairness of this scenario as part of the planning process.

Impact of changes to design during planning process

Despite the additional information submitted by the applicant, the MSPT is still concerned at the impact of this development on the locality. The additional information submitted will have minimal effect on the impact of this proposed development on this historical quarter of the city. Within the further information submitted, the applicant's agent suggests that its proposals are "generally" found to address DCC's concerns. The MSPT challenges this vague assertion.

The MSPT has previously described the negative impact of the proposed overall development across six sites in previous submissions including submissions currently under consideration by An Bord Pleanála.

Scaled Model

The MSPT again highlights that no reference to the three-dimensional scaled model submitted as Significant Further Information was evident on the revised Site Notices or Newspaper Advertisement.

This is a glaring omission and contrary to the fairness of the planning system. The provision of the scaled model should have been brought to the attention of the model. The MSPT reserves its right to challenge the fact that this information was withheld from the public.



10/10/2020

The first part of the report is a summary of the project and the objectives. The second part is a description of the methodology used. The third part is a description of the results. The fourth part is a conclusion.

The methodology used in this project was a combination of qualitative and quantitative methods. The qualitative methods included interviews with the participants and the analysis of the data. The quantitative methods included the use of statistical software to analyze the data.

The results of the project show that there is a significant difference between the two groups.

The conclusion of the project is that the results are significant and that there is a need for further research in this area. The authors recommend that future studies should focus on the same area and should use a larger sample size.

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Conclusion

The scale and density of the proposed design in this planning appeal is contrary to the proper planning and sustainable development of such an important area of Dublin city. The scale of this project bears no relationship to the existing scale of Moore Street buildings and the laneways in the locality. The demolition or part-demolition of historic buildings is unnecessary and should not take place. This planning application does not reflect the historical importance of the area - described by the National Museum of Ireland as 'the most important historic site in modern Irish history'. There is little consideration throughout this application for the Battlefield Site (see Appendix A) as a whole.

The Moore Street Preservation Trust urges ABP to refuse planning permission for this proposed development in the national interest, the public interest and in the interest of the proper planning and sustainable development of this very important historic area.

The MSPT asks ABP to review the manner in which DCC has facilitated the developer at all times to progress a project which is inappropriate on these sites. The proposed building heights, façade treatments and site coverage/density of development are inappropriate.

As ABP will be aware, the MSPT is extremely critical of Dublin Central GP's ongoing planning submissions for the redevelopment of sites in this locality. The Trust believes the submissions take little account of the significance of the existing buildings and laneways of history in the area which together form an historic Battlefield Site which must be protected and preserved.

The MSPT asks ABP to refuse planning permission for the proposed development.

The Moore Street Preservation Trust
20th October 2023



The first part of the paper discusses the importance of understanding the underlying structure of the data. This is particularly relevant in the context of machine learning, where the ability to identify patterns and relationships in the data is crucial for making accurate predictions. The second part of the paper focuses on the development of a new algorithm for analyzing time series data. This algorithm is designed to be more robust to noise and to better capture the underlying trends in the data. The third part of the paper presents the results of a series of experiments that compare the performance of the new algorithm to that of several existing methods. The results show that the new algorithm is able to outperform the existing methods in a number of key metrics, including accuracy and computational efficiency.

The fourth part of the paper discusses the implications of these findings for the field of machine learning. In particular, it highlights the need for more research into the development of robust and efficient algorithms for analyzing time series data. The fifth part of the paper concludes with a summary of the main findings and a discussion of the limitations of the current study. Finally, the sixth part of the paper provides a list of references to the literature cited in the paper.

The authors would like to thank the following people for their assistance in the preparation of this paper: [Name], [Name], and [Name]. The authors would also like to thank the following organizations for their support of this research: [Organization], [Organization], and [Organization].

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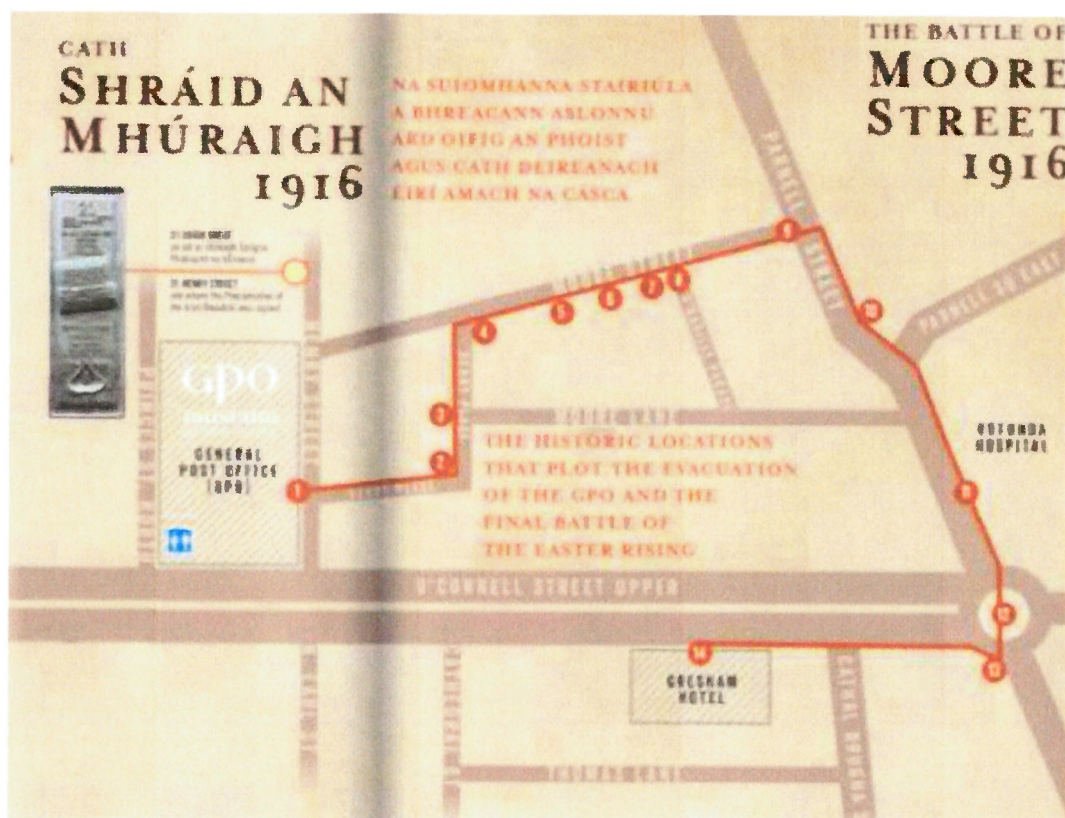
APPENDIX A

Moore Street and the 1916 Battlefield site: an historic quarter

The historical importance of the locality around the site of the proposed development must be highlighted. The map below shows various locations on or close to the applicant's site (numbered 1-14). The importance of each location is listed and described below, to highlight the historical importance of the area. A walk through the area today will highlight the number of 1916 buildings, features and fabric still visible. Looking down Henry Place the aspect is exactly the same as the volunteers would have seen in 1916. The entrance to Henry Place is framed by two portals of magnificent buildings, one on each corner.

Moore Street and the 'Moore Street Battles' are well documented and are recognised as a series of events which formed the platform for the foundation of the Irish Republic. The lands and buildings, fronted by Moore Street and bounded by Henry Place, Moore Lane, and O'Rahilly Parade are sometimes referred to as "the island." This forms the core of the historic Moore Street Quarter.

Most importantly this planning application is close to a National Monument and Protected Structures at 14-17 Moore Street (discussed further below) and this proposed development in proximity to the monument will have a serious negative impact on that monument. Dublin City Council may have granted planning permission for the proposed development on the site but the decision has been made with inadequate information. The grant of permission is littered with conditions seeking further details and this is simply inappropriate when the project is in close to a National Monument and to Protected structures.



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THE HISTORY OF THE

REIGN OF HENRY THE SEVENTH

OF ENGLAND

BY

JOHN HALLAM

IN THREE VOLUMES

LONDON

Key to the Map:

1. The GPO which would become headquarters for the military operations of the Easter Rising
2. O'Brien's Mineral Water Works which was occupied by Connolly's men, who had evacuated the GPO, led by Michael Collins
3. The White House at the junction of Henry Place and Moore Lane took heavy fire from the Rotunda. A barricade was set up as a shield here
4. No. 10 Moore St which volunteers entered through a side door to avoid the heavy fire. It was decided to take over the Moore St. terrace of houses by burrowing from house to house
5. No. 16 Moore St. where a wounded James Connolly was carried from No. 10 Moore St.
6. Hanlon's yard at 20/21 Moore St. where volunteers gathered and decided to surrender
7. No. 25 Moore St which the volunteers reached after burrowing from house to house
8. Sackville Lane (now O'Rahilly Parade) where Michael Joseph O'Rahilly made a final dash to, wounded and under fire, after attacking the British army barricade
9. The location of the British army barricade at Parnell St. Elizabeth O'Farrell made her way from 15 Moore St. to the barricade under a white flag. She was brought to meet General Lowe
10. After returning to Moore St., O'Farrell was accompanied by Padraig Pearse to meet General Lowe in Parnell St.
11. The Rotunda Hospital where volunteers were escorted after laying down their arms
12. The Parnell monument where volunteers were ordered to march to where they were to lay down their arms
13. Tom Clarke's shop where Elizabeth O'Farrell was held prisoner
14. The Gresham Hotel where the volunteers had been ordered to march to the Parnell Monument

The evacuation route from the GPO through Henry Place into the Moore Street Terrace is today in line and form exactly as it appeared to volunteers fleeing the burning GPO under machinegun fire and heavy artillery shelling.

The volunteers led by Michael Collins sought refuge here only to be met with machine-gun fire from enemy forces on Parnell Street. A barricade was erected at the junction of Moore Lane and Henry Place to shield volunteers as they crossed at the wave of the sword held by none other than Joseph Mary Plunkett. 17 volunteers were wounded at this location. Michael Mulvihill and Henry Coyle were killed in action here. It is a hugely significant location in the story of the evacuation and in the Battle of Moore Street - the final battle of The Rising.

The Bottling Stores that frame this junction were occupied and held by volunteers led by Frank Henderson. They are original buildings and qualify for National Monument protection since their preservation is without doubt a matter of national importance.

The applicants proposal to site a hotel on Henry Place and remove the Bottling Stores (O'Connell Street side) simply beggars belief. One can only conclude that they are blissfully unaware of what took place in these lanes of history and in particular at this location.

If the final meeting place of the leaders is deemed worthy of preservation and protection, it surely follows that the route to that historic location has to be viewed as being of equal importance. High Court Judge Max Barrett held that **'the wealth of evidence before the Court concerning the historical significance of the bottling stores is such that the court cannot but and does unhesitantly conclude that the stores comprise both a monument and a National Monument.**

He continued **'can there be any doubt, faced with such powerful observations from so distinguished in their field as to see them appointed Director and Acting Director of the National Museum of**

Ireland, that the current streetways and alignments of the Moore Street 'theatre of conflict' satisfy the criteria identified in the National Monuments Acts to be national monuments? To the Courts mind they cannot'.

Please note that any development relating to O'Rahilly Parade must be sensitive to its place in the history of The Rising. Three volunteers were killed in action here. The O Rahilly, the only leader to die in the field of battle was left to die here overnight. Found dead alongside him were Charles Carrigan and Francis Macken. The rear yard of No. 25 Moore Street was the location of a gathering of volunteers preparing a final do or die charge on the enemy barricade on Parnell Street. As they emerged from the yard they were summoned back to No. 16 Moore Street and told of the decision to surrender. The last act of The Rising took place in this historically important laneway.

It should be noted that while this appeal concerns a subdivided site for development, the developer's overall plan for the locality encompasses six separate sites which will be the subject of six separate planning applications, three of which are ongoing. The developed sites will have a detrimental impact on the areas shown on the map above, including the laneways, due to the overall scale of the proposed developments relative to the low scale Moore Street terrace. It is the Trust's opinion that this current planning application and other adjoining current and forthcoming planning applications will have a wholly negative impact on what should be an historical and cultural quarter, commemorating the events of 1916. The City Council has permitted a development which has little respect for the historical events of the locality or for the National Monument at 14-17 Moore Street. The applicant's proposal is a commercial proposal for an area described by the National Museum as "the most important historic site in modern Irish history".

In 2016 the Mayor's Forum on Moore Street, under the then Dublin Mayor, Críona Ní Dhálaigh, brought together a team who produced a booklet "Moore Street Battlefield Site Plan, the Lanes of history", commissioned by Dublin City Council which proposed a conservation plan for the Moore Street area as an historic cultural quarter.

In 2021 the Moore Street Preservation Trust produced a plan for the Moore Street area including an architectural model. The plan meets all the recommendations of the Advisory group to the Minister; the objectives of the Development Plan; the aims of the Moore Street Renewal Bill presented to An Seanad by Minister Darragh O'Brien and European and International guidelines and charters. A presentation was made to Dublin City Council, including the Chief Planner, and the model was publicly displayed in City Hall. The Office of the Lord Mayor expressed support for the plan as a positive way forward in the proposed development of Moore Street.

Finally please also note that this site, as part of a larger site, was previously the subject of an appeal to An Bord Pleanála (PL29N.232347; page 106). The Board's inspector Ms. Jane Dennehy recommended a refusal of planning permission which was confirmed by the Board. As part of the reasons for the refusal Ms. Dennehy wrote:

It is considered that the proposed destruction of the **internal lane network and construction of new streets and public spaces of excessive proportions, width and exposure**, would radically change the existing street hierarchy and grid like layout of linear streets and lanes within the area and the historic context of the GPO and no's 14 to 17 Moore Street monuments which stand registered under National Monuments Acts. As a result the proposed development would fail to integrate into the established pattern and context of the north central city and would therefore be seriously injurious to the amenities and contrary to proper planning and development of the area.

