

Please find enclose responses concerning 3 no. separate Appeals:

1. Case No: ABP-312603-22 Planning Authority Reference No: 2861/21
2. Case No: ABP-312642-22 Planning Authority Reference No: 2862/21
3. Case No: ABP-313947-22 Planning Authority Reference No: 2863/21

The Moore Street Preservation Trust would appreciate a separate acknowledgement for each submission.



## 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,  
46 Marlborough Street,  
Dublin 1

6<sup>th</sup> February 2024

Re. Protected structure: Planning permission sought for development for a period of 7 years at Nos. 36 - 41 Henry Street, Nos. 1 - 9 Moore Street, Nos. 3 - 13 Henry Place (formerly known as Nos. 2 - 13 Henry Place), Clarke's Court and Mulligan's Lane, Dublin 1. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, 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), Dublin 1.

Case Number: ABP-312603-22 Planning Authority Reference Number: 2861/21

A chara,

Thank you for your correspondence of the 23<sup>rd</sup> January seeking submissions or observations in relation to a number of responses to the Section 137 request as issued by An Bord Pleanála on the 13<sup>th</sup> December 2023.

The Moore Street Preservation Trust (MSPT) is supportive of the submissions made on behalf of the following:

- Diarmuid Breathnach
- Mary Lou McDonald TD
- Relatives of the Signatories to the 191 Proclamation
- Shane Stokes

However the MSPT comments on the following submissions (see enclosed):

- Stephen Little & Associates on behalf of Dublin Central GP Ltd.
- Dublin City Council
- Dublin Town

Should you have any queries concerning the Trust's observations, please do not hesitate to contact the undersigned.

Is mise le meas,

p.p.

  
Micheál Mac Donncha  
Rúnaí

Moore Street Preservation Trust

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
09 FEB 2024	
Fee: €	_____ Type: _____
Time: 9.00	By: post

**Stephen Little & Associates on behalf of Dublin Central GP Ltd.**

The applicant's agent has addressed its response to the Section 137 request, as issued by An Bord Pleanála, under the new/revised policies and objectives of Dublin City Development Plan 2022-2028 chapters, to which the MSPT responds below. The relevant chapters are:

Chapter 4	Shape and Structure of the city
Chapter 5	Quality Housing and Sustainable Neighbourhood
Chapter 6	City Economy and Enterprise
Chapter 7	The City Centre, Urban Village and Retail
Chapter 8	Sustainable Movement and Transport
Chapter 11	Built heritage and Archaeology
Chapter 12	Culture
Chapter 13	Strategic Development Regeneration Area
Chapter 15	Development Standards

It is the applicant's opinion that its Masterplan for a number of adjoining sites on Moore Street and O'Connell Street constitutes "a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape."

The Moore Street Preservation Trust challenges this assertion. The dominant factor across all the planning applications is an emphasis on the commercial viability of the projects. The large scale of development, the high density of development and the proposed uses across the development all highlight the commercial basis for the proposals. At the same time the lack of real or proper reference to the historic nature of this quarter resonates throughout each planning application.

The Dublin City Development 2022-2028, particularly with the additional Protected Structures added, should ensure an additional protection to some buildings or parts of buildings but this is not reflected in the information submitted by the applicant. The applicant's proposal to simply integrate the ground floor façade of the former O'Brien's Mineral Water Building on Henry Place (now deemed a Protected Structure; RPS 8906) within its design is a simplistic, thoughtless approach. The historic façade would be dominated by an eight-storey building above and adjoining it. The demolition drawings submitted as part of the applicant's response to An Bord Pleanála only serve to highlight the destruction of an historic terrace of buildings in this historic quarter.

While the MSPT is aware that Dublin City Council's Planners and Management have supported this project throughout all the planning applications, it should be noted that this is at variance with the elected members of Dublin City Council who have constantly advocated adding further Protected Structures to the Council's Record of Protected Structures and for any planning solution to give proper consideration to the historic nature of this quarter. This has not occurred. The commentary from the applicant in its response to the Section 137 gives little hope of this occurring. Section 2.6.2 of the applicant's response refers to the site having an "association with the events of the 1916 Easter Rising, during which most of the buildings that stood at that time were destroyed." This assertion has

been challenged by many and indeed such challenges by the elected Councillors ensured that the additional listings were added to the Record of Protected Structures.

The Dublin City Development Plan 2022-2028 includes a reference to the site falling within the Strategic Development Regeneration Area (SDRA) 10 – Northeast inner city (NEIC). The Development Plan states that *"Given the significance of this area and its regeneration potential, Dublin City Council (DCC) is committed to preparing a Local Area Plan (LAP) for the SDRA during the lifetime of this development plan, and, therefore, this SDRA forms an interim strategy and sets guiding principles for the LAP"*.

The MSPT is concerned that no such LAP has been commenced and it is MSPT's opinion that no decision on this planning application can be made by ABP until the Council fulfils its commitment and obligation to prepare that LAP. It is not fair or reasonable that the applicant's Masterplan and Masterplan Design Statement replaces the Council's LAP. The MSPT asks ABP to ensure that a LAP is provided by the Council.

This site forms part of the Moore Street Battlefield site which the National Museum of Ireland has described as "the most important historic site in modern Irish history." Moore Street holds a special place in the history of Ireland. It was in Moore Street and the surrounding streets and laneways (to the rear of the site which is the subject of this application) and at the nearby GPO, that a fierce battle was fought between the 1916 republican forces and the British Army. For over two decades a campaign has been waged, led by the Relatives of the Signatories and involving the relatives of many of those who participated in the Rising, to preserve Moore Street and its environs as a National Monument.

The MSPT asks An Bord Pleanála to protect this historic quarter. As the Board will be aware the Trust engaged its own design team and put forward an alternative design, giving due consideration to the historic nature of the quarter.

The Trust asks the Board to refuse planning permission for this application. Unfortunately the overall project and the applicant's Masterplan are wholly inappropriate for these important historic sites located in central Dublin.

### **Dublin City Council**

Dublin City Council's response to the Section 137 request, as issued by An Bord Pleanála, rightly highlights the revised policies and objectives within the Dublin City Development Plan 2022-2028 and its revised Record of Protected Structures.

However the Council once again indicates its support for the project in its response, which the MSPT is critical of. As previously stated, that support has been evident throughout the planning process with many pre-planning and ongoing planning meetings taking place before a decision was made by the Council. Despite this the developer has sought a judicial review concerning the City Council's decision to add buildings and sections of buildings to the Record of Protected Structures.

As stated above the MSPT is concerned that no LAP has been commenced and it is MSPT's opinion that no decision on this planning application can be made by ABP until Dublin City Council fulfils its commitment and obligation to prepare that LAP. It is not fair or reasonable that the applicant's Masterplan and Masterplan Design Statement replaces the Council's LAP. The MSPT asks ABP to ensure that a LAP is provided by the Council. Furthermore the MSPT asks ABP not to uphold the Council's decision to grant planning permission for this site.

### **Dublin Town**

The response to An Bord Pleanála's Section 137 request submitted by the business group 'Dublin Town' is unsurprisingly in full support of this planning application.

The submission states that "the proposed Dublin Central development achieves much of what is required to regenerate the city's northern commercial core." While it is understandable that a business group will adopt a 'commercial only' view of development, there is only a single brief reference to the events of 1916 in the submission made. The MSPT believes that a properly designed historic quarter can be part of a commercial development, as has been shown in its own plans for the area. There is no reason that a properly designed historic quarter of the city could not attract visitors similar to other prominent tourist attractions across Dublin.

The emphasis on commercial success in Dublin Town's submission is understandable but the proposed development must give proper reference to the historic nature of this part of Dublin city. The MSPT believes such references are inadequate in the design of the scheme currently under consideration by ABP and asks the Board to refuse to uphold the Council's grant of permission.