

File With _____

SECTION 131 FORM

Appeal NO: ABP 312642-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 12/2/24
fromapplicant I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): no new material
planning issuesE.O.: Lith ClonDate: 15/02/23

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____ Task No: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 312642-22

M _____

Please treat correspondence received on 12/2/24 - email as follows:

- | | |
|--|--|
| 1. Update database with new agent for Applicant/Appellant _____
2. Acknowledge with BP <u>23</u>
3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____
2. Keep Envelope: <input type="checkbox"/>
3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments

applicant's response to SIB1

4. Attach to file

- | | |
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| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/> | |

RETURN TO EO ☐

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Litz Clear</u>	AA: <u>Cathy Carleton</u>
Date: <u>15/02/24</u>	Date: <u>15/02/24</u>

LISA/CITA.

Derek Kelly

From: Naoise O'Connor <naoiseoconnor@sla-pdc.com>
Sent: Monday 12 February 2024 14:05
To: Appeals2; Bord
Cc: SLA Dublin Central
Subject: ABP Ref. 312642-22 - Response to Submissions - Dublin Central Site 4
Attachments: Cover Letter DC S4 Response to Submissions .pdf; 20035 DCP Site 4_Response to Further Submissions.pdf

Follow Up Flag: Follow up
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Dear Sir, Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our Client (the Applicant), Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576 to submit this First Party response to submissions in relation ABP Ref 312642-22 as issued by An Board Pleanála on the 23rd January 2024.

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Kind Regards,

Naoise O'Connor
Assistant Planner
STEPHEN LITTLE & ASSOCIATES
Chartered Town Planners & Development Consultants
26/27 Upper Pembroke Street,
Dublin 2 D02 X361

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SLA | Stephen Little
& Associates

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The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Our Ref. 20035

12 February 2024

RE: RESPONSE TO FURTHER SUBMISSIONS

PLANNING APPLICATION FOR THE PROVISION OF A MIXED-USE SCHEME COMPRISING 15NO. RESIDENTIAL UNITS, 2NO. CAFÉ/RESTAURANT UNITS, 5NO. RETAIL UNITS, 1NO. OFFICE, A CULTURAL USE AND A PUBLIC PLAZA AT NOS. 10 – 13 AND NOS. 18 – 21 MOORE STREET, NO. 5A MOORE LANE (ALSO KNOWN AS NOS. 15 – 16 HENRY PLACE), NOS. 6 – 7 AND NOS. 10 – 12 MOORE LANE AND NOS. 17 – 18 HENRY PLACE (ALSO KNOWN AS NOS. 4 – 5 MOORE LANE), DUBLIN 1 (DUBLIN CENTRAL – SITE 4)

AN BORD PLEANÁLA REF: ABP-312642-22

DUBLIN CITY COUNCIL REG. REF: 2862/21

Dear Sir / Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 submit this First Party Response to Further submissions made on the recently submitted request for Further Information made under Section 137 of the Planning & Development Act 2000, as amended relating to ABP Ref. ABP-312642-22 (Dublin Central Site 4), issued to An Bord Pleanála on the 11 January 2025.

This submission responds to a letter from An Bord Pleanála, dated 23 January 2024, inviting the Applicant to make a submission / observation in writing to the Board in relation to the following 6no. Third Party submissions:

- Shane Stokes, Greencastle, Season Park, Newtownmountkennedy, Co. Wicklow A63 A500,
- Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F,
- Relatives of the Signatories to the 1916 Proclamation, 4 Oxford Road, Ranelagh, Dublin 6,
- Moore Street Preservation Trust, Ireland Institute, The Pearse Centre, 27 Pearse Street, Dublin 2,
- Mary Lou MacDonald, 58 Fassauga Avenue, Cabra West, Dublin 7,
- Sinn Féin Group, Dublin City Council, City Hall, Dublin 2.

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Yours faithfully,



Stephen Little,
Managing Director
STEPHEN LITTLE & ASSOCIATES

Applicant's
Response to
Further
Submissions on
Section 137
Request
Dublin Central
– Site 4

For Development
Comprising Retail,
Restaurant / Café,
Residential, Office and
Ancillary Development.

At Nos. 10-13 Moore
Street and Nos. 1-8 and
Nos. 11-12 Moore
Lane, Dublin 1

For Dublin Central GP
Limited

FEBRUARY 2024

Document Control: -

Author	Checked by	Purpose	Date
NOC	MO'S	Draft	31.01.2024
NOC	MO's	Final Draft	08.02.2024
NOC	-	Final	12.02.2024

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 make this submission to the Board in response to its notification dated 23 January 2024.

This submission concerns the case of ABP-312642-22 - Dublin Central Site 4. It is made on behalf of the Applicant / 1st Party, Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576.

This submission comprises the 1st Party's response to the Submissions made in respect of the Further Information provided to the Board on 11 January 2023, under Section 137 of the Planning & Development Act 2000, as amended.

This submission provides the 1st Party Response to the following submissions furnished to it by the Board: -

- Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F,
- Shane Stokes, Greencastle, Season Park, Newtownmountkennedy, Co. Wicklow A63 A500,
- Relatives of the Signatories to the 1916 Proclamation, 4 Oxford Road, Ranelagh, Dublin 6,
- Moore Street Preservation Trust, Ireland Institute, The Pearse Centre, 27 Pearse Street, Dublin 2,
- Mary Lou MacDonald, 58 Fassauga Avenue, Cabra West, Dublin 7,
- Sinn Féin Group, Dublin City Council, City Hall, Dublin 2.

In response to the Board's invitation and for the avoidance of doubt this Report should be read in conjunction with the response to the Section 137 request issued to An Bord Pleanála on the 11 January 2024. Section 2 of that Report details what the 1st Party considered to be the most relevant policy provisions of the current Dublin City Development Plan 2022 – 2028 ("the Development Plan") and the Applicant's response in respect of how the proposed development is consistent with same.

2 RESPONSE TO FURTHER SUBMISSIONS

The Applicant has gone to great lengths to ensure that a comprehensive planning assessment of the proposal was provided to An Board Pleanála in response to the Section 137 request for Further Information, issued to the Board on the 11 January 2024. This response demonstrated how the proposed development is compliant with the relevant statutory planning policy as set down in the Dublin City Development Plan 2022-2028 and thus with the proper planning and development of the area.

Notwithstanding, in making this further response to the Board, we have sought to identify all of the grounds of objection, raised in the various submissions identified above. We then provide the Applicant's response to all issues raised having regard to the provisions of the relevant chapter(s) of the Development Plan. Having carefully reviewed the content of the 6no. Third Party Appeals, our summary of the submissions are as follows: -

- Dublin City Council Submission – Response policies / objectives of the Development Plan not addressed in First Party Section 137 Response.
- Record of Protected Structures and Heritage policies / objectives

The below response will address all 6no. submissions made. We will address the submissions following the Board's layout, chapter by chapter of the Development Plan.

2.1 Chapter 4 – Shape and Structure of the City

Dublin City Council identifies a number of policies and objectives of the Development Plan that they recommend the Board has regard to. One policy in Chapter 4 – Shape and Structure of the City listed by Dublin City Council, that has not already been addressed by the Applicant in its submission dated 11 January 2024, is: -

SC8 - Development of the Inner Suburbs:

To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.

2.1.1 Applicant's Response

We refer the Board in the first instance, to the Applicants response submission, dated 11 January 2024 for a full analysis of how the proposed Site 4 development complies with the policies and objectives of Chapter 4 – Shape and Structure of the City of the Development Plan. The following response addresses the residual objectives / policies highlighted by Dublin City Council.

The Dublin Central Masterplan Area ("the Masterplan") is a significant urban regeneration project that encourages high-quality urban design and architectural detailing that contributes to the historic streetscape and creates new points of interest in the area. The Masterplan is underpinned by the Dublin Central Masterplan Area Conservation Management Plan prepared by Molloy & Associates Conservation Architects, having regard to the sensitive historic character of this part of the city centre. The Site 4 proposal is representative of plan-led, high-quality urban and architectural design, which seeks to achieve the sustainable regeneration of an underutilised brownfield site. It delivers an appropriate mix of uses, both vertically and horizontally, with street activating retail and café / restaurant and cultural uses at ground and first floor levels, complemented by residential and hotel use at uppers floors.

We also refer the Board to Section 2.8 of the Section 137 Response Report (submitted 11 January 2024), for further discussion of regeneration in the specific context of the Strategic Development and Regeneration Area (SDRA 10 North East Inner City – O'Connell Street – Moore Street Civic / Cultural Hub). The proposed redevelopment of this brownfield city centre site would deliver mixed-use redevelopment which is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport. The area is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport.

2.2 Chapter 5 – Quality Housing and Sustainable Neighbourhoods

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

QHSN 38 - Housing and Apartment Mix

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.

Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.

QHSN47 - High Quality Neighbourhood and Community Facilities

To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.

QHSN58 - Culture in Regeneration

To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.

2.2.1 Applicant's Response

We refer the Board to the Applicants response submission, dated 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 5 – Quality Housing and Sustainable Neighbourhoods. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

We refer the Board to section 2.9.16 of the Section 137 response Report as submitted to the board on the 11 January 2024, which discusses unit mix and the standards set out in the North Inner City SDRA. In this section it was acknowledged that the unit mix does not strictly meet the unit mix requirements above. The Board are however invited to take account of the fact that the residential units located in No. 20 – 21 Moore Street and in No. 10 Moore Street are constrained by virtue of the existing historic fabric of these buildings (which are now also Protected Structures) and these buildings are proposed to be refurbished in this case. We also highlight that Section 15.9.1 of the Development Plan provides some flexibility in terms of unit mix for building refurbishment schemes in sites of any size.

Site 4 encourages the creation of a new neighbourhood and community, through the addition of a vibrant new residential community as part of a revitalised urban quarter envisaged by the Dublin Central Masterplan. Culture has also been at the forefront of this application from the outset, we refer to the Masterplan Design Statement, prepared by ACME Architects which notes how culture is at the forefront of this regeneration project as the Masterplan considers the historic streetscape, responds to key events of the 1916 Rising and the historic Moore Street Market.

2.3 Chapter 6 – City Economy and Enterprise

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

CEE3 - Promoting and Facilitating Foreign Direct Investment

To promote and facilitate foreign direct investment into the city by working closely with the IDA and other agencies, and having regard to the needs of international investment. To recognise that there is a role for Dublin City Council in establishing a positive and attractive 'brand' for the city and in facilitating investment in the ongoing growth and regeneration of the city.

CEE20 - Vacant Sites

To engage in the 'active land management' of vacant sites and properties including those owned by Dublin City Council.

To engage proactively with land-owners, potential developers and investors with the objective of encouraging the early and high quality re-development of such vacant sites.

To encourage and facilitate the rehabilitation and use of vacant and under-utilised buildings, including their upper floors.

To promote and facilitate the use, including the temporary use, of vacant commercial space and vacant sites, for a wide range of enterprise including cultural uses.

CEE21 - Supply of Commercial Space and Redevelopment of Office Stock

To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses.

To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city.

CEE26 - Tourism in Dublin

To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the appropriate, balanced provision of tourism facilities and visitor attractions.

To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors and to promote Dublin as a setting for conventions and cultural events.

To improve the accessibility of tourism infrastructure to recognise the access needs of all visitors to our city.

CEE34 - Craft Enterprises

To recognise that craft enterprises, designers' studios/workshops etc., along with visitor centres, provide economic development and regeneration potential for the city, including the promotion of tourism. To promote Dublin city centre as a destination for such creative industries and for the cultural and artistic sectors.

2.3.1 Applicant's Response

We refer the Board to the Applicant's response submission, dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 6 – City Economy and Enterprise. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

It is acknowledged that there is significant under-utilisation within the entire Masterplan area. The proposed development forms part of a wider regeneration and development project, Dublin Central, planned for an area comprising almost three entire urban blocks located between O'Connell Street Upper, Parnell Street, Moore Street and Henry Street. There is significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment that will enhance the competitive position of Dublin city centre. This will include the integration and adaptive reuse of existing built fabric that is important to our sense cultural identity. The Masterplan seeks to inject new life through the sustainable regeneration and revitalisation of this area at the heart of Dublin City centre. The Site 4 proposal provides a new opportunity for the long awaited renewal and regeneration of the underutilised Dublin Central area, with mixed use development including retail, café / restaurant, residential and office units.

Site 4 proposes an extension to the National Monument at No. 18A Moore Street. The purpose of the extension is to provide an ancillary space for the National Monument with an independent entrance from the proposed public plaza. The provision of the extension will support the future role of the National Monument (No. 14 – 17 Moore Street) as a cultural hub / 1916 Commemorative Centre which is located outside the parameters of Site 4, further improving the tourism infrastructure on site.

2.4 Chapter 7 – The City Centre, Urban Village and Retail

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

CCUV41 - New Infrastructure Development

Infrastructure projects in Dublin City should ensure placemaking outcomes through a design-led approach. Dublin City Council will work the relevant agencies / infrastructure providers to achieve public realm enhancements in the design, implementation and delivery of infrastructure projects.

CCUVO18 - Streets and Lanes Dublin 1

To work with city stakeholders including local businesses, and the BIDs group 'WeAreDublintown' to implement a number of public realm projects arising from the Re-Imagining Dublin One study and to extend best practice from these projects to other parts of Dublin 1 and the city. This includes the North Lotts Planning Study and the 'Reimagining Dublin One Laneways' project'

CCUVO19 - Linking Office and Culture Clusters to the Retail Core

To devise a programme to enhance pedestrian amenities, encourage more street based activities and provide micro spaces along key routes from office and culture clusters to the retail core to enhance the vibrancy of the streetscape and to draw office workers and tourists into the retail core.

2.4.1 Applicant's Response

We refer the Board to the Applicant's response submission dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 7 – The City Centre, Urban Village and Retail. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

We wish to note that Policy CCUV41 - New Infrastructure Development does not apply to this development as it is not an infrastructure development.

A Scenario Testing & Development Design Report, prepared by Space Syntax, on existing pedestrian movement patterns and pedestrian numbers, underlines the inhibiting and impermeable nature of the existing Masterplan site in its current format for pedestrian movement. This has informed the design process. The site is in line with Objective CCUVO19 - Linking Office and Culture Clusters to the Retail Core through providing enhanced pedestrian amenities in Dublin's City Centre, as the Scenario Testing & Development Design Report concludes: -

"The Masterplan maximises footfall benefits to Moore Street by improving its connection to O'Connell Street via the new East West route, also linking the street to a large public space. The streets and spaces in the Masterplan are designed to cater to the significant increase in movement and maintain a high Pedestrian Comfort Level throughout the scheme and surrounding street network. The configuration of urban blocks in the new development creates a high degree of permeability and continuity of routes within the site. Consequently, pedestrian movement through the lanes is significantly improved. The location of retail and food & beverage land uses along the new routes will further serve to attract pedestrian movement through the development."

2.5 Chapter 8 – Sustainable Movement & Transport

The following policies / objectives identified in the Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated 11 January 2024, are: -

SMT8 - Public Realm Enhancements

To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.

SMT9 - Public Realm in New Developments

To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.

SMT12 - Pedestrians and Public Realm

To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.

SMT14 - City Centre Road Space

To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.

SMT22 - Key Sustainable Transport Projects

To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:

- DART +
- Metrolink from Charlemount to Swords
- BusConnects Core Bus Corridor projects
- Delivery of Luas to Finglas
- Progress and delivery of Luas to Poolbeg and Lucan

SMT27 - Car Parking in Residential and Mixed Use Developments

To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.

To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. To safeguard the residential parking component in mixed-use developments.

2.5.1 Applicant's Response

We refer the Board to the Applicant's response submission dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 8 – Sustainable Movement & Transport. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

A Landscape / Public Realm Masterplan has been prepared by Gross Max Landscape Architects. The Landscape Masterplan Report, presents a cohesive landscaping concept is designed to tie the various Sites within the Masterplan together. Equally, it seeks to integrate with the existing street context, including Moore Street, O'Connell Street Upper, Parnell Street and Henry Street. Site 4 introduces the provision of a new archway on Moore Street to link Moore Street with Moore Lane via the proposed public plaza.

The area is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport, as generally described below: -

- Many of the streets in the immediate area have cycle lanes which provide direct access to the Dublin Strategic Cycle Network.

- There are several Dublin Bikes Stations in the vicinity at Jervis Street, Parnell Square North, Parnell Street, Princes Street and Cathal Brugha Street which are all within a 3 – 6 minute walk from the application site.
- The Luas Green line operates between Brides Glen at Cherrywood in Sandyford and Broombridge and the Luas Red Line operates between Saggart / Tallaght and the 3Arena / Connolly. The two lines intersect at the junction of O'Connell Street and Abbey Street adjacent to the south-east of the site due to the introduction of Luas Cross City. Red Luas and cross city Luas lines serve stops at Heuston Station, O'Connell Street and Parnell Square, which act as termini for numerous Dublin Bus services.
- Connolly Train Station is located c. 800 m (c. 10 – 12 minute walk) east of the site which allows interchange with DART services and Iarnród Éireann commuter services.
- Extensive bus services are available on O'Connell Street including Dublin Bus (31no. routes), private interurban routes and airport services. Aircoach operate a 24-hour service at 10-20 minute intervals through O'Connell Street from Sandyford, Greystones, Cork and Belfast. Citylink provides hourly services from Bachelor's Quay (c.200m) and Aston Quay (c. 400m) in each direction from Dublin Airport to Galway and Limerick. Wexford Bus operates frequent return services from Dublin Airport to Wexford via Custom House Quay (c. 700m) and George's Quay (c. 550m).
- O'Connell Street, Parnell Square East, Parnell Street and Parnell Square West to the north and east of the site are four of the essential primary links included in the proposed Bus Connects network.
- BusÁras is located c. 600m (c. 8 – 10 minute walk) east of the application site, which allows interchange with Dublin Bus services, Córas Iompair Éireann (CIÉ) regional bus services and private intercity bus services.
- A proposed Metrolink line (Metrolink Project – at railway order application stage) will provide for a high-capacity, high-frequency rail service between Dublin Airport and the LUAS Green Line at Charlemont, with stops proposed at both ends of O'Connell Street. Metrolink will have a stop under Site 2AB and Site 2C, the design of which will allow Metrolink to be developed independently by TII. The future development of Site 2AB and Site 2C will include Metrolink Enabling Works (MEW) to facilitate the future implementation of the Metrolink Station (see Section 6 of the Planning Report submitted as part of the application for further detail).

No car parking is proposed as part of Site 4. As noted above, the site is exceptionally well located adjacent a number of modes of public transport. DCC Transportation Department as part of Pre-Planning dialogue that the provision of no parking was acceptable given the location of the site.

We refer the Board to the Transport Assessment – Vol. 3: Overall Development and Travel Plan, prepared by Waterman Moylan Consulting Engineers as submitted with the planning application, in respect of existing and future public transport, pedestrian and cycling links to the site.

2.6 Chapter 11 – Built Heritage and Archaeology

The submissions from Dublin City Council, Mary Lou McDonald TD, Sinn Féin Group and the Moore Street Preservation Trust all refer to the recent additions along Henry Place and Moore Street to the Record of Protected Structures.

Shane Stokes discusses Chapter 11 – Built Heritage and Archaeology in detail, asserting that the scheme does not comply with the objectives of Chapter 11, the need to retain historic fabric, and protect the O'Connell Street Architectural Conservation Area (ACA). The submission asserts that Moore Street is a priority Architectural Conservation Area (ACA) and that the scheme does not comply with the O'Connell Street ACA.

The following policies / objectives identified in the Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated 11 January 2024, are: -

BHA6 - Buildings on Historic Maps

That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report that it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

BHA8 - Demolition in an ACA

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA10 - Demolition in a Conservation Area

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of a Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA14 - Mews

To promote the redevelopment and regeneration of mews lanes, including those in the north and south Georgian core, for sensitively designed, appropriately scaled, infill residential development, that restores historic fabric where possible, and that removes inappropriate backland car parking areas.

BHA18 - Historic Ground Surfaces, Street Furniture and Public Realm

To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts, and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on Paving: The Conservation of Historic Ground Surfaces (2015).

To maintain schedules of stone setts, historic kerbing and historic pavers/flags, and associated features in the public realm, to be protected, conserved or reintroduced (Appendix 6), and to update and review these schedules during the period of this development plan.

BHA21 - Retrofitting Sustainability Measures

To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage- Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings.

BHA22 - Upgrading Environmental Performance

To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:

- *The significance of the structure, and*

- *The extent of intervention, including impact on historic fabric, the technical requirements of a traditionally constructed building, visibility, siting and design.*
- *The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.*

2.6.1 Applicant's Response

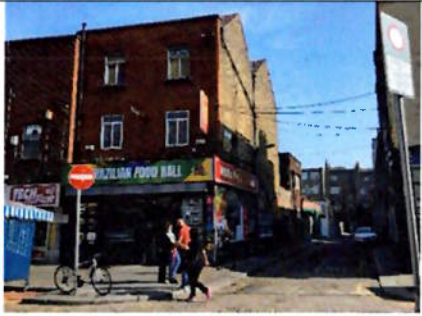

We refer the Board in the first instance, to the Applicants response to the Section 137 request as submitted on the 11 January 2024 for a full analysis on how Site 4 complies with the policies and objectives of Chapter 11 – Built Heritage and Archaeology.



There is extensive volume of material relating to the identification and qualification of architectural heritage associated with Site 4 and of the Dublin Central Masterplan accompanying the planning application in this case. We trust the Board will have regard to same in their consideration of this appeal. It is not proposed to re-state all of that voluminous material here to avoid unnecessary repetition. As noted in the previous Section 137 response, since the submission of this planning application for Site 4 and subsequent appeals, No. 10 Moore Street, No. 12 Moore Street, No. 13 Moore Street, Nos. 17 – 18 Henry Place and Nos. 20 – 21 Moore Street have been added to the Record of Protected Structures. For the convenience of the Board, attached with this submission is a copy of the Reports of Dublin City Council in respect of these properties relative to Site 4 that were confirmed by a vote of Dublin City Council on the 7 November 2022 and which clarifies the extent of the Protected Structure in each case, including its curtilage. We trust the Board will verify this position with the Planning Authority.

We refer the Board to the Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects, as submitted with the planning application. In particular Appendices A4.3, A4.4, A4.5 A4.6 and A4.10 which describes the Protected Structures in great detail. In particular, the Board will note that Appendix A4.11 included an assignment of significance to certain upstanding building fabric and which included an assessment of the buildings, now included on the Record of Protected Structures. In the context of Site 4 and in recognition of the Applicant's identification of these structures as having heritage significance, the Board will note that the assessment of Architectural Heritage was undertaken largely on the basis as if the above properties were already on the Record of Protected Structures. Further fabric of significance, notably Nos. 6 – 7 Moore Lane, were also voluntarily retained, safeguarded and integrated on the same principle.

The following table is an extract from section 15.1.1.1 of Chapter 15 of the EIAR as submitted as part of the application. The Board is invited to also refer to Appendix A4 of the Dublin Central Masterplan Area Conservation Management Plan for further detail on the contribution of Site 4 to the urban battlefield of 1916. We also refer to the demolition drawings prepared by ACME Architects as submitted as part of the application which show the extent of demolition proposed at each of these protected structures. An extract from Appendix A4.11 of the Architectural Heritage Impact Assessment prepared by Molloy & Associates Conservation Architects is set out below for convenience: -

Structure	Assigned Significance	Brief Description	Proposed Development Rationale
10 Moore Street * Building denoted in Fig.15.4.1 by a red asterisk - described in greater detail in a report within the Architectural Heritage Impact Assessment attached to a planning	Of high significance Rear attached buildings are of	<i>Architectural, historical significance</i> Three-storey-over-basement, two-bay brick-fronted premises facing Moore Street with south elevation to Henry Place. Red brick facade laid in Flemish bond to front and yellow brick English garden	Main house to be adapted for use as apartments over retail.

application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.	limited / no significance	<p>wall bond to south elevation, granite coping.</p> <p>The square-headed window opens to the upper floors are replacement timber casements. The ground floor shopfront has been replaced. Brick frontages suggest a late-19th or early 20th century date and the building was substantially upgraded in 1950. However, there is evidence internally that early fabric survives within the building.</p>	
12 Moore Street	<p>Building of limited/ no significance</p> <p>Party wall with No.13 of high significance</p>	<p><i>Three-storey, two-bay brick-fronted premises. Red brick facade laid in stretcher bond. Flat roof. Modern shop front to ground floor. Aluminum casement windows to upper floors. Built c.1960 as a grocery and subsumed into the adjacent KC Confectionery building in the early 1970s.</i></p> <p><i>A surviving party wall shared with No.13 Moore Street is 18th century in origin but visible only from within No.13.</i></p> <p><i>No evidence of early fabric survives elsewhere.</i></p>	<p>Building to be demolished and site redeveloped</p> <p>The party wall to be retained.</p> 
13 Moore Street	<p>Building of limited/ no significance</p> <p>Party wall with No.12 of high significance</p>	<p>Two-storey, two-bay brick fronted building with flat roof. Red brick facade laid in English garden wall bond surmounted by granite coping. Blind facade to second floor and blind windows to first floor. Modern shop front to ground floor level.</p> <p>The building was rebuilt in the 1960s for the Kylemore Bakery.</p> <p>A surviving party wall shared with No.12 Moore Street is 18th century in origin and presents with two possible creep holes.</p>	<p>Building to be demolished and site redeveloped</p>

			 <p>The party wall to be retained.</p>
<p>Nos 20 – 21 Moore Street</p> <p>* Building denoted in Fig.15.4.1 by a red asterisk - described in greater detail in a report within the Architectural Heritage Impact Assessment attached to a planning application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.</p>	<p>Of high significance</p>	<p><i>Nos.20-21 Moore Street are 18th century in origin with later interventions. Whilst extensively modified, with many early features lost, their early building forms are still legible, rendering a credible assignment of architectural significance as two buildings within an 18th century terrace.</i></p>	<p>Main houses to be adapted for use as apartments over retail. Rear structures at 12 Moore Lane to be demolished to make way for public square</p> 

It is a key objective of the Development Plan Core Strategy to protect and enhance the special characteristics of the city's built and natural heritage. The principal measures enabling Dublin City Council to achieve this objective is the Record of Protected Structures and the designation of Architectural Conservation Areas. The City Council has identified priority areas of special historic and architectural interest and within these areas will review the Record of Protected Structures, consider the recommendations of the National Inventory of Architectural Heritage and, where required, designate Architectural Conservation Areas. O'Connell Street & Environs is designated as an ACA. Site 4 itself lies outside the O'Connell Street ACA. We also wish to note that Moore Street is not currently an ACA under the Development Plan nor has the formal process of varying the Development Plan to include any additional ACA's commenced at the time of making this submission.

The Masterplan aims to tackle the issue around vacancy within the city centre. It aims to re-use existing building stock through refurbishment and retrofitting in so far as possible. It was noted by the Planning Authority that the development will support the principle of bringing of upper floors into active use, reducing vacancy and rehabilitating and reusing existing older buildings.

2.7 Chapter 12 – Culture

The submissions made by the Moore Street Preservation Trust, Shane Stokes and the Relatives of the Signatories of the 1916 Proclamation all refer to Objective CU09 of the Development Plan. The

Applicant did not respond specifically to this objective in its Section 137 response submission dated 11 January 2024. A response is now provided to Objective CU09 of the Development Plan below.

The following further policies / objectives identified in the Dublin City Council submission that have not already been addressed by the Applicant in its 11 January 2024 response submission, are: -

CU2 - Cultural Infrastructure

To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.

CU4 - Cultural Resources

To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.

CU9 - Parnell Square and North Inner City Cultural Cluster

To promote and support the growth of the Parnell Square and North Inner City cultural cluster to facilitate opportunities that provide benefits both to the wider City and to the economic growth and regeneration for the NEIC that supports artists, mitigates social exclusion and increases opportunities for expression and artistic engagement for the diverse local community and in particular, young people.

CU13 - Protection of Cultural Uses

To protect cultural uses within the city that have been negatively impacted by the Covid pandemic and seek to preserve such spaces so they are not lost to the city as a result of the economic impact of the extended closure during the pandemic.

CU20 - Cultural Activities in the Evening

To support the growth in cultural activities within the city and to encourage cultural institutions and amenities within the city to operate into early evening time on a regular basis, and to explore the development of more regular evening cultural experiences on a pilot basis.

CU21 - Night Time Economy Taskforce Report

To be guided by the recommendations set out in the National Night Time Economy Taskforce Report 2021 and to seek that Dublin is selected as a pilot for the creation of a Night Time Advisor and stakeholder committee.

CU09 - 14-17 Moore Street

To Support the preservation and restoration of the historic terrace 10-25 Moore Street and adjacent yards and lanes, and the remaining historic built heritage of the street, including numbers 18 Moore Street and the establishment of a commemorative visitor centre, as a fitting tribute to the men and women of the Easter 1916 and as an educational and cultural resource centre and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report, OPW and other stakeholders including the response of the Misiter for Heritage and Electoral Reform.

CU026 - Demolition or Replacement of a Use of Cultural Value

Where applications are made seeking to demolish or replace a cultural space/use, the development must re-accommodate the same or increased volume of space/use or a similar use within the redevelopment. Cultural uses include theatres, cinemas, artist studios, performance spaces, music venues, nightclubs, studios and dance space.

CUO39 - Purpose Built Spaces for Evening and Night Time Activities

To encourage the opportunity presented by new larger developments, including a requirement for all new large hotels and aparthotels*, within the city to provide high quality, designed for purpose spaces that can accommodate evening and night time activities, such as basement/roof level "black box" spaces that can be used for smaller scale performances/theatre/music/dance venues, and/or for flexibility in the design of larger spaces, such as conference spaces, to be adaptable for evening and night-time uses.*

**Over 100 bedrooms*

2.7.1 Applicant's Response

We refer the Board in the first instance, to the Applicants response to the Section 137 request as submitted on the 11 January 2024 for a full analysis on how Site 4 complies with the policies and objectives of Chapter 12 – Culture. The following response addresses the residual objectives / policies highlighted by Dublin City Council and the key points of other submissions.

We refer to section 2.7 of the 11 January 2024 submission, which provides a breakdown of all the proposed cultural uses across the Masterplan. The Masterplan, as implemented through the planning applications for the Site 4 and other site proposals, helps to make Dublin City Centre a culturally vibrant, creative and diverse city. Site 4 / Dublin Central Masterplan lands are located on one of Ireland's premier streets at the heart of the city centre, with access to an abundance of community, arts and cultural spaces including Parnell Square, a new cultural quarter.

The proposed development provides a ranges of active uses at ground floor to encourage activity throughout the day and into the night. This approach has been replicated across the Masterplan and was considered by the Planning Authority to be acceptable. The range, balance and configuration of uses proposed for Site 4 can serve to attract and sustain desirable activity during the day and night, to create a City Centre destination that is commercially competitive and attractive, inclusive and vibrant.

We refer the board to the response to CUO9 - 14-17 Moore Street below, prepared by Dublin Central's Conservation Architects Molloy & Associates. By way of framing a response, each component of the Objective is analysed below:

The preservation and restoration of the historic terrace 10-25 Moore Street

The applicant supported a forensic analysis of this section of Moore Street at an early stage in the design process, mapping the position and known extent of pre-1916 building fabric, as a basis for its collective retention, safeguarding and presentation within the proposed redevelopment of plots containing post-1916 building fabric.

The preservation and restoration of adjacent yards and lanes

The legibility and enhanced expression of Moore Lane and Henry Place is a central design objective of the Dublin Central Masterplan. It is accepted that the mergence of historic laneways and yards within the building blocks of Site 3 and Sites 4- 5, reflects their infilling and amalgamation as has occurred over the course of time since 1916. The viability of the three developments to an extent relies on the continuance of this adopted tradition, whilst preserving, restoring and presenting building fabric of significance.

The preservation and restoration of the remaining historic built heritage of the street, including numbers 1-8 Moore Street

Historic building fabric, not mentioned in this Objective, namely the voluntary retention, restoration and presentation of Nos 7-8 Moore Lane, together with street surfaces and kerbing, has been carefully identified as requiring preservation and integration within the proposed development. For reasons cited in MOLA's Design Statement submitted as part of the planning application for Site 3, the demolition of Nos 1-8 Moore Street is proposed, whilst retaining No.9 Moore Street (which is considered of comparable significance to No.10 Moore Street- yet remains excluded from the RPS) and Nos 9-11 Henry Place.

The establishment of a commemorative visitor centre

Whilst the establishment of this centre falls outside the remit of the applicant, it has made every effort to consider the National Monument and its setting within the overall masterplan including the provision of upgraded and new public realm. All considerations given to the National Monument take account of the contents and relevant recommendations of the Moore Street Advisory Group Report, OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform

The design team consulted at all stages of the design process with cited statutory stakeholders, considering feedback and addressing concerns.

2.8 Chapter 13 – Strategic Development Regeneration Area

Shane Stokes quotes the requirements of the SDRA in his submission.

The following objective listed by Dublin City Council was not name checked by the Applicant in the Section 137 response (11 January 2024), but we would submit that its general provisions have been considered at length through the application and appeal stages : -

SDRA01 (Objective) - *To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:*

Architectural Design and Urban Design: *All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.*

Phasing: *Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.*

Access and Permeability: *Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*

Height: *Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.*

Urban Greening and Biodiversity: *Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.*

Surface Water Management: *All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This*

should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail.

Flood Risk: *All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.*

River Restoration: *Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.*

Sustainable Energy: *Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.*

Climate Change: *Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.*

Cultural Infrastructure: *All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.*

2.8.1 Applicant's Response

The application site falls within the Strategic Development Regeneration Areas (SDRA) 10 – Northeast Inner City (NEIC) of the current Development Plan. We wish to acknowledge that masterplans should incorporate heritage-led retention and restoration of all pre-1916 buildings and fabric along Moore Street. The Dublin Central Masterplan seeks to optimise the regeneration opportunities presented by the central location, accessibility, architectural heritage features and cultural identity of O'Connell Street and environs, including Henry Street, Moore Street and Moore Lane. We refer to the Masterplan Design Statement, prepared by ACME Architects and to the accompanying Architectural Heritage assessments prepared by Molloy & Associates, Conservation Architects which address the heritage led approach of the masterplan. Chapter 13 also notes that proposals should respond to the policies and provisions of the O'Connell Street Architectural Conservation Area (ACA), 2001, and the Scheme of Special Planning Control for O'Connell Street & Environs 2016, including any amendments thereto, along with those of the proposed Draft Moore Street Architectural Conservation Area or similar where adopted. The Draft Moore Street Architectural Conservation Area has not yet been adopted and Site 4 itself lies outside the O'Connell Street ACA.

We refer the Board to section 2.8.2 of the Section 137 response (11 January 2024), which demonstrates how the scheme is compliant with SDRA 10. It should be noted that in the DCC submission it is noted that the proposal "would support and be in accordance with a number of policies and related objectives

of the Dublin City Development Plan 2022-2028; in particular policy SDRAO1 and the guiding principals under SDRA10”.

We refer to the applicant’s response to Objective SDRAO1 below:

- **Architectural Design and Urban Design:** The development is of high quality and adheres to key architectural and urban design principles set out in Chapter 15. We refer the Board to the Masterplan Design Statement, prepared by ACME Architects submitted at application stage which sets out the frameworks for the redevelopment of the overall land holding, as well as the Architectural Design Statement for Site 4 also prepared by ACME Architects.
- **Phasing:** We refer the Board to the Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers submitted with the planning application for Site 4 for further details on different stages of construction, co-ordinated as necessary with other planned works that may take place during the planned construction period.
- **Access and Permeability:** The proposed development ensures adequate permeability and connectivity to the surrounding city centre area and public transport infrastructure. Site permeability and connectivity to the wider Masterplan area that includes well-designed public realm will drive footfall, increase dwell time and activate the interior of this urban block, in addition to sustaining active uses at Henry Street and Moore Street. Site 4 as a component of the wider Dublin Central masterplan has been designed to meet the mobility needs and convenience of all. The scheme delivers good permeability throughout allowing all-inclusive access without compromising the existing historical character. We refer to the Scenario Testing & Design Development Report, prepared by Space Syntax.
- **Height:** Site 4 comprises buildings of 2 – 3 storeys in height. The Planning Authority generally welcomes the modulation of massing and height across Site 4, whereby the massing of the overall development has been broken down into a number of smaller elements, respecting historic building height at street edges and plot widths, and the scale of the existing surrounding built environment.
- **Urban Greening and Biodiversity:** The landscape of the Dublin Central site has informed the overall landscaping plans for the area. The scheme provides good connectivity and enhances biodiversity within the city centre environment. The Site 4 proposal is considered in the context of the Dublin Central Landscape Masterplan, prepared by Gross Max Landscape Architects. The landscape masterplan is guided by an overall design vision, which includes the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions. The Site 4 proposal will be accessible to the enhanced network of existing and proposed public streets and spaces within the wider Dublin Central Masterplan area.
- **Surface Water Management:** The proposed design maximises sustainable energy uses and materials, it incorporates appropriate SuDS measures and seeks to enhance biodiversity as a component part of the wider Dublin Central Masterplan area.
- **River Restoration:** Not applicable to Dublin Central site.
- **Sustainable Energy:** It is noted that a key climate mitigation action for all new development relates to the need to reduce energy demand, to increase energy efficiency and to provide renewable energy on-site if possible. We refer the Board to the Dublin Central – Site 4 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers which accompanied the planning application. The proposal contained in the BDP Report aligns with the requirements set out above. It identifies that *“The Dublin Central Site 4 project is aspiring to be one of Ireland’s first Net Zero Carbon schemes offering residents, visitors and guests a low carbon footprint alternative for Dublin.”* There will also be zero fossil fuels used on site throughout construction.
- **Climate Change:** As above.
- **Cultural Infrastructure:** See response in Section 2.8.2 of the Section 137 request as submitted on the 11 January 2024.

2.9 Chapter 15 – Development Standards

There were a number of sections from Chapter 15 mentioned in Dublin City Councils Submission which the applicant did not specifically respond to in the Section 137 response issued to the Board on the 11 January 2024, these are noted in sections 2.10.1.1 to 2.10.1.13 below.

2.9.1 Applicant's Response

Firstly, we would highlight that Chapter 15 of the Development Plan set out Development Standards and that the Development Plan states that *"The guidance and principles set out are intended as a guide to prospective applicants as to how new development should stimulate responsive and innovative design in the city."* As such all the below are guidance rather than policies or objectives which must be adhered to.

2.9.1.1 Section 15.3 - Environmental Assessment – EIA/AA/Ecological Impact Assessment

An Environmental Impact Assessment Report, co-ordinated by Stephen Little and Associates and a Appropriate Assessment Report, prepared by Scott Cawley were prepared as part of the application for Site 4 submitted at application stage and reconsidered at Further Information stage. We refer to board to the same.

2.9.1.2 Section 15.4 - Key Design Principals

For a comprehensive response in relation to Healthy Place Making, Architectural Design Quality, Sustainable and Climate Action and Inclusivity and Accessibility we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

However, in relation to safe and secure design, the design of Site 4 and the overall masterplan promotes safety and security through passive surveillance, avoiding blank facades and providing adequate lighting.

The design statement prepared by ACME at application stage notes that *"The external lighting Provides a safe environment for pedestrians, cyclists and moving vehicles, to deter anti-social behaviour"* and *"The new public square is overlooked by the office uses within Sites 5, 2C and 2B, and from the commercial uses to the south within Site 4. It will also be overlooked by the apartments within Nos. 20-21 Moore Street, also within Site 4. The new square is designed to be used by the wider community within central Dublin, rather than only the residents of or workers in the Masterplan."*

2.9.1.3 Section 15.5 - Site Characteristics and Design Parameters

For a comprehensive response in relation to Brownfield, Regeneration sites, Height, Density, plot ratio, Architectural Design Statements, Models and Photomontages we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

The standards set out under 15.5.2 infill development is not relevant to this application. In terms of alterations and retrofitting non-domestic buildings, the proposed development at Site 4, as a component of the wider Dublin Central Masterplan, aims to tackle the issue around vacancy within the city centre. It seeks to re-use or integrated existing building stock through refurbishment and retrofitting in so far as possible. It will deliver active residential use at upper floors and integrate existing built fabric in a manner that is supported by the planning authority. The conservation approach also seeks to ensure that protected structures and other buildings of historic significance are brought into viable re-use, instilling new life and activity into what was hitherto unusable floor space notwithstanding its location overlooking one of Dublin's shopping streets. In relation to Materials and Finishes, the proposed new buildings complement the existing material palette and propose similar high-quality and self-finished materials to preserve the character of the ACA. We refer the Board to

the Architectural material submitted at application stage and Further Information stage for more details on this.

2.9.1.4 Section 15.6 - Green Infrastructure

For a comprehensive response in relation to the introduction of section 15.6 we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

Site 4 is considered in the context of the Dublin Central Landscape Masterplan, prepared by Gross Max Landscape Architects. The landscape masterplan is guided by an overall design vision, which includes the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions. The proposed design incorporates appropriate SuDS measures and seeks to enhance biodiversity as a component part of the wider Dublin Central Masterplan area.

2.9.1.5 Section 15.7 - Climate Action

For a comprehensive response in relation to Climate Action and Energy Statement we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

As noted in section 2.10.1.3 above the scheme seeks to re-use or integrated existing building stock through refurbishment and retrofitting in so far as possible.

An extensive Energy and Sustainability statement was prepared by BDP at planning application stage. This confirms that *"It is not practical to feed the entire scheme with on-site renewable electricity."* However, *"the energy usage of Site 4 is minimised through a number of key measures. Preference is given to the use of passive measures to minimise the buildings demand for energy and these measures are then supported by active energy systems that generate and distribute energy in an efficient way."*

These measures include the following:

- *The level of insulation and unwanted air leakage control will be excellent. The design team will minimise air leakage and check construction quality by closely monitoring the constructions on site. Ultimately the air leakage and insulation levels will be tested through the use of air leakage and thermography tests.*
- *The ratio of solid to glazed areas have been carefully designed for each facade and orientation in order to achieve an appropriate balance between natural light, ventilation, heat gain and heat loss.*
- *The buildings and external lighting systems are intended to be entirely LED based.*
- *The air and water systems are designed to vary their output in proportion to the demand in order to minimise their energy usage.*
- *Fresh air systems are fitted with heat recovery systems, offering the recovery of waste heat energy.*
- *Heating and hot water is generated through highly efficient air source heat pumps in order to completely remove the carbon impact of heating and hot water.*
- *Solar Photovoltaics at roof level of all buildings are provided to generate clean renewable on-site energy.*
- *Information on the key technologies used to reduce the energy consumption of the building will be given to residents to encourage the promotion of sustainable construction."*

2.9.1.6 Section 15.8 - Residential Development

In relation to quality housing and sustainable neighbourhoods we refer the board to Section 2.2.1 above in response to Chapter 5.

The application did not provide a social and community audit however the proposed site proposed 11no. apartment units which is below the threshold to provide a social and community audit under the Development Plan.

As discussed elsewhere in this report, and at length in the planning application report and appeal submissions, Site 4 is a mixed use scheme and well connected to a wide range of city centre amenities and services.

2.9.1.7 Section 15.9 - Apartment Standards

For a response in relation to unit mix we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

For all a response to all other apartment standards we refer to the Planning Application Reports, prepared by Stephen Little and Associates, submitted to Dublin City Council at planning application and further information stages.

2.9.1.8 Section 15.13 - Other Residential Typologies

The majority of Section 15.13 of the Development Plan is not applicable to the Site 4 proposal or to the Dublin Central Masterplan, as the proposed scheme does not include student accommodation, shared accommodation, care homes, etc.

However, Section 15.13.6 relating to living over the shop requires that Dublin City Council will actively encourage the development of residential accommodation over existing commercial premises. It is identified that there is a considerable amount of vacancy and underutilised floorspace on the upper floors of commercial premises that have the capacity to contribute significantly to the housing stock of the city. The proposed development at Site 4 and the Dublin Central Masterplan seeks to reduce existing vacancy and underutilised floorspace within the Masterplan area, and is consistent with Section 15.13.6 of the Development Plan.

2.9.1.9 Section 15.14 - Commercial Development / Miscellaneous

Sub sections 15.14.4 – Offices and 15.14.7 – Retail and Food & Beverage, of the Development Plan, are all relevant to the proposed development at Site 4 and the overall Masterplan.

The Planning Authority raised no concern with the range of proposed uses at Site 4, these uses being *“considered to be acceptable”*.

Through offering a more dynamic retail, food & beverage and leisure offering in the city centre, Site 4 provides an opportunity in the Dublin City Retail Core to evolve in a mixed-use sustainable manner and create a destination for people to linger, stay, live, shop, work and socialise during the day and at night time. As recommended in Section 15.14.4 – Offices of the Development Plan, the proposed scheme was accompanied by an Architectural Design Statement, this was prepared by ACME Architects at application stage and refined through Further Information stage. All relevant standards identified in Section 15.14.7 – Retail and Food & Beverage of the Development Plan have been appropriately considered as part of the application at both application stage and further information stage. We refer the Board to the planning documents as submitted at these stages, which have been furnished to it by Dublin City Council.

2.9.1.10 Section 15.15 Built Heritage and Archaeology

In response to section 15.15 of the Development Plan regarding Built Heritage and Archaeology we refer the Board to the previous sections of this response report and other documents identified as follows: -

- Section 2.6 above.

- Section 2.6 of the Section 137 response issued to the Board on the 11 January 2024.
- Masterplan Conservation Plan, prepared by Molloy & Associates Conservation Architects as submitted at planning application stage.
- Chapter 15 and 16 of the Environmental Impact Assessment Report, prepared by Stephen Little & Associates Town Planning and Development Consultants as submitted at planning application stage.
- Site 4 Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects as submitted at planning application stage.
- Site 4 Archaeological Impact Assessment, prepared by Courtney Derry Heritage Consultants as submitted at planning application stage.
- Site 4 Architectural Conservation Further Information Responses, prepared by Molloy & Associates Conservation Architects as submitted at Further Information Stage.

2.9.1.11 Section 15.16 Sustainable Movement and Transport

We refer the board to Section 2.5 above and section 2.5 of the Section 137 response issued to the Board on the 11 January 2024, for a response in relation to sustainable movement and transport.

We also refer to the various transportation reports submitted at planning application stage for Site 4 and the Masterplan.

2.9.1.12 Section 15.17 - Public Realm

For a response in relation to Shopfront and Façade Design we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

In relation to Public realm it is also worth noting the Fáilte Ireland made a submission on the Site 4 and noted the following:-

"The importance of Dublin as Ireland's primary national gateway and as an international city attracting both domestic and foreign investment, with a vibrant tourism sector, and the revenue generated by this is noted. It is considered that the proposal would contribute positively to the Dublin tourism brand by reason of quality urban design and placemaking, which will facilitate vibrancy and animation during both day and night time and provision of public realm enhancements and new public spaces in the city centre, strengthening the night time economy which is considered an important aspect of revitalising the city centre, by complementing the retail offering and offering cultural experiences appealing to residents and visitors, and by improved orientation and navigation as a result of enhanced permeability and an improved public realm."

The Dublin Central Masterplan, including Site 4 will add to the public realms of this city centre site, enhancing the benefit and enjoyment of the locality and offer a range of various activities. The open spaces, both public and private, create a sense of place and uses high quality material and finishes throughout, the orientation and design of the site maximises daylight and sunlight availability across the development.

2.9.1.13 Section 15.18 - Environmental Management

We refer the Board to the various environmental management reports as submitted at application stage for the Masterplan and Site 4, these are as follows:

- Preliminary Construction Traffic Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.

- Masterplan Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Overall Development – Basement Impact Assessment, prepared by Waterman Structures Limited.
- Engineering Drawings, prepared by Waterman Moylan Consulting Engineers.
- Site 4 Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers Limited.
- Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Preliminary Construction Traffic Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Basement Impact Assessment, prepared by Waterman Structures Limited.
- Site 4 Structural Report, prepared by Waterman Structures Limited.
- Site 4 Subterranean Construction Method Statement, prepared by Waterman Structures Limited.
- Construction & Demolition Waste Management Plan (enclosed in Appendix 14.1 of the accompanying EIAR), prepared by Awn Consulting.
- Operational Waste Management Plan (enclosed in Appendix 14.2 of the accompanying EIAR), prepared by Awn Consulting.
- Telecommunications Report, prepared Independent Site Management Ltd.
- Site 4 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers.

3 CONCLUSION

We do not consider that the submissions made to the Board, in respect of the Applicant's Further Information submission dated 11 January 2024, raise any significant new issues that the Applicant and the Planning Authority have not already comprehensively dealt with through the Planning Application, Further Information and appeal process.

It remains our opinion that the proposed Site 4 scheme as presented to the Board under ABP Ref. ABP-312642-22 is consistent with all of the relevant policies and objectives of the Dublin City Development Plan 2022 – 2028.

STEPHEN LITTLE & ASSOCIATES

12 February 2024

Derek Kelly

From: Damien Kelly [REDACTED] >
Sent: Monday 12 February 2024 14:48
To: Appeals2
Subject: Query About Appeal Decision Date

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Bord Pleanála Case reference: PL29N.317740
Planning Authority Case Reference: 3783/23

Hi

My name is Damien Kelly, 25 Carleton Road, Marino, Dublin 3. D03P681. See appeal Case number above.

The date for a decision on our appeal was Dec 23.

I'm wondering if you could provide an approximate date when we can expect a decision?

Kind regards,

Damien

Sent from Outlook for Android

Derek Kelly

From: Conor [REDACTED]
Sent: Monday 12 February 2024 15:01
To: Appeals2
Subject: ABP Case No. 313845
Attachments: Abp 313845-22 Decision to grant.pdf

Caution: This is an External Email and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi,

I would like to request the inspectors report for this decision, I represent the applicant in this case which was decided on the 8/2/24

Regards
Conor

Conor Quirke B. Eng MIEI



| Ranguet | Killorglin | Co Kerry | V93 XA31

M [REDACTED] T 066 9761558 E info@mfquirke.ie W www.quirkequarries.com

Derek Kelly

From: Naoise O'Connor <naoiseoconnor@sla-pdc.com>
Sent: Monday 12 February 2024 14:05
To: Appeals2; Bord
Cc: SLA Dublin Central
Subject: ABP Ref. 312642-22 - Response to Submissions - Dublin Central Site 4
Attachments: Cover Letter DC S4 Response to Submissions .pdf; 20035 DCP Site 4_Response to Further Submissions.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir, Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our Client (the Applicant), Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576 to submit this First Party response to submissions in relation ABP Ref 312642-22 as issued by An Board Pleanála on the 23rd January 2024.

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Kind Regards,

Naoise O'Connor
Assistant Planner
STEPHEN LITTLE & ASSOCIATES
Chartered Town Planners & Development Consultants
26/27 Upper Pembroke Street,
Dublin 2 D02 X361

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[Call me on teams](#)
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To ensure the most efficient use of resources, attendance at meetings will continue using various digital formats, including Microsoft Teams and Zoom.

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The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Our Ref. 20035

12 February 2024

RE: RESPONSE TO FURTHER SUBMISSIONS

PLANNING APPLICATION FOR THE PROVISION OF A MIXED-USE SCHEME COMPRISING 15NO. RESIDENTIAL UNITS, 2NO. CAFÉ/RESTAURANT UNITS, 5NO. RETAIL UNITS, 1NO. OFFICE, A CULTURAL USE AND A PUBLIC PLAZA AT NOS. 10 – 13 AND NOS. 18 – 21 MOORE STREET, NO. 5A MOORE LANE (ALSO KNOWN AS NOS. 15 – 16 HENRY PLACE), NOS. 6 – 7 AND NOS. 10 – 12 MOORE LANE AND NOS. 17 – 18 HENRY PLACE (ALSO KNOWN AS NOS. 4 – 5 MOORE LANE), DUBLIN 1 (DUBLIN CENTRAL – SITE 4)

AN BORD PLEANÁLA REF: ABP-312642-22

DUBLIN CITY COUNCIL REG. REF: 2862/21

Dear Sir / Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 submit this First Party Response to Further submissions made on the recently submitted request for Further Information made under Section 137 of the Planning & Development Act 2000, as amended relating to ABP Ref. ABP-312642-22 (Dublin Central Site 4), issued to An Bord Pleanála on the 11 January 2025.

This submission responds to a letter from An Bord Pleanála, dated 23 January 2024, inviting the Applicant to make a submission / observation in writing to the Board in relation to the following 6no. Third Party submissions:

- Shane Stokes, Greencastle, Season Park, Newtownmountkennedy, Co. Wicklow A63 A500,
- Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F,
- Relatives of the Signatories to the 1916 Proclamation, 4 Oxford Road, Ranelagh, Dublin 6,
- Moore Street Preservation Trust, Ireland Institute, The Pearse Centre, 27 Pearse Street, Dublin 2,
- Mary Lou MacDonald, 58 Fassagh Avenue, Cabra West, Dublin 7,
- Sinn Féin Group, Dublin City Council, City Hall, Dublin 2.

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Yours faithfully,



Stephen Little,

Managing Director

STEPHEN LITTLE & ASSOCIATES

Applicant's
Response to
Further
Submissions on
Section 137
Request
Dublin Central
– Site 4

For Development
Comprising Retail,
Restaurant / Café,
Residential, Office and
Ancillary Development.

At Nos. 10-13 Moore
Street and Nos. 1-8 and
Nos. 11-12 Moore
Lane, Dublin 1

For Dublin Central GP
Limited

FEBRUARY 2024

Document Control: -

Author	Checked by	Purpose	Date
NOC	MO'S	Draft	31.01.2024
NOC	MO's	Final Draft	08.02.2024
NOC	-	Final	12.02.2024

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 make this submission to the Board in response to its notification dated 23 January 2024.

This submission concerns the case of ABP-312642-22 - Dublin Central Site 4. It is made on behalf of the Applicant / 1st Party, Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576.

This submission comprises the 1st Party's response to the Submissions made in respect of the Further Information provided to the Board on 11 January 2023, under Section 137 of the Planning & Development Act 2000, as amended.

This submission provides the 1st Party Response to the following submissions furnished to it by the Board: -

- Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F,
- Shane Stokes, Greencastle, Season Park, Newtownmountkennedy, Co. Wicklow A63 A500,
- Relatives of the Signatories to the 1916 Proclamation, 4 Oxford Road, Ranelagh, Dublin 6,
- Moore Street Preservation Trust, Ireland Institute, The Pearse Centre, 27 Pearse Street, Dublin 2,
- Mary Lou MacDonald, 58 Fassagh Avenue, Cabra West, Dublin 7,
- Sinn Féin Group, Dublin City Council, City Hall, Dublin 2.

In response to the Board's invitation and for the avoidance of doubt this Report should be read in conjunction with the response to the Section 137 request issued to An Bord Pleanála on the 11 January 2024. Section 2 of that Report details what the 1st Party considered to be the most relevant policy provisions of the current Dublin City Development Plan 2022 – 2028 ("the Development Plan") and the Applicant's response in respect of how the proposed development is consistent with same.

2 RESPONSE TO FURTHER SUBMISSIONS

The Applicant has gone to great lengths to ensure that a comprehensive planning assessment of the proposal was provided to An Bord Pleanála in response to the Section 137 request for Further Information, issued to the Board on the 11 January 2024. This response demonstrated how the proposed development is compliant with the relevant statutory planning policy as set down in the Dublin City Development Plan 2022-2028 and thus with the proper planning and development of the area.

Notwithstanding, in making this further response to the Board, we have sought to identify all of the grounds of objection, raised in the various submissions identified above. We then provide the Applicant's response to all issues raised having regard to the provisions of the relevant chapter(s) of the Development Plan. Having carefully reviewed the content of the 6no. Third Party Appeals, our summary of the submissions are as follows: -

- Dublin City Council Submission – Response policies / objectives of the Development Plan not addressed in First Party Section 137 Response.
- Record of Protected Structures and Heritage policies / objectives

The below response will address all 6no. submissions made. We will address the submissions following the Board's layout, chapter by chapter of the Development Plan.

2.1 Chapter 4 – Shape and Structure of the City

Dublin City Council identifies a number of policies and objectives of the Development Plan that they recommend the Board has regard to. One policy in Chapter 4 – Shape and Structure of the City listed by Dublin City Council, that has not already been addressed by the Applicant in its submission dated 11 January 2024, is: -

SC8 - Development of the Inner Suburbs:

To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.

2.1.1 Applicant's Response

We refer the Board in the first instance, to the Applicants response submission, dated 11 January 2024 for a full analysis of how the proposed Site 4 development complies with the policies and objectives of Chapter 4 – Shape and Structure of the City of the Development Plan. The following response addresses the residual objectives / policies highlighted by Dublin City Council.

The Dublin Central Masterplan Area ("the Masterplan") is a significant urban regeneration project that encourages high-quality urban design and architectural detailing that contributes to the historic streetscape and creates new points of interest in the area. The Masterplan is underpinned by the Dublin Central Masterplan Area Conservation Management Plan prepared by Molloy & Associates Conservation Architects, having regard to the sensitive historic character of this part of the city centre. The Site 4 proposal is representative of plan-led, high-quality urban and architectural design, which seeks to achieve the sustainable regeneration of an underutilised brownfield site. It delivers an appropriate mix of uses, both vertically and horizontally, with street activating retail and café / restaurant and cultural uses at ground and first floor levels, complemented by residential and hotel use at upper floors.

We also refer the Board to Section 2.8 of the Section 137 Response Report (submitted 11 January 2024), for further discussion of regeneration in the specific context of the Strategic Development and Regeneration Area (SDRA 10 North East Inner City – O'Connell Street – Moore Street Civic / Cultural Hub). The proposed redevelopment of this brownfield city centre site would deliver mixed-use redevelopment which is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport. The area is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport.

2.2 Chapter 5 – Quality Housing and Sustainable Neighbourhoods

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

QHSN 38 - Housing and Apartment Mix

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.

Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.

QHSN47 - High Quality Neighbourhood and Community Facilities

To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.

QHSN58 - Culture in Regeneration

To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.

2.2.1 Applicant's Response

We refer the Board to the Applicants response submission, dated 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 5 – Quality Housing and Sustainable Neighbourhoods. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

We refer the Board to section 2.9.16 of the Section 137 response Report as submitted to the board on the 11 January 2024, which discusses unit mix and the standards set out in the North Inner City SDRA. In this section it was acknowledged that the unit mix does not strictly meet the unit mix requirements above. The Board are however invited to take account of the fact that the residential units located in No. 20 – 21 Moore Street and in No. 10 Moore Street are constrained by virtue of the existing historic fabric of these buildings (which are now also Protected Structures) and these buildings are proposed to be refurbished in this case. We also highlight that Section 15.9.1 of the Development Plan provides some flexibility in terms of unit mix for building refurbishment schemes in sites of any size.

Site 4 encourages the creation of a new neighbourhood and community, through the addition of a vibrant new residential community as part of a revitalised urban quarter envisaged by the Dublin Central Masterplan. Culture has also been at the forefront of this application from the outset, we refer to the Masterplan Design Statement, prepared by ACME Architects which notes how culture is at the forefront of this regeneration project as the Masterplan considers the historic streetscape, responds to key events of the 1916 Rising and the historic Moore Street Market.

2.3 Chapter 6 – City Economy and Enterprise

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

CEE3 - Promoting and Facilitating Foreign Direct Investment

To promote and facilitate foreign direct investment into the city by working closely with the IDA and other agencies, and having regard to the needs of international investment. To recognise that there is a role for Dublin City Council in establishing a positive and attractive 'brand' for the city and in facilitating investment in the ongoing growth and regeneration of the city.

CEE20 - Vacant Sites

To engage in the 'active land management' of vacant sites and properties including those owned by Dublin City Council.

To engage proactively with land-owners, potential developers and investors with the objective of encouraging the early and high quality re-development of such vacant sites.

To encourage and facilitate the rehabilitation and use of vacant and under-utilised buildings, including their upper floors.

To promote and facilitate the use, including the temporary use, of vacant commercial space and vacant sites, for a wide range of enterprise including cultural uses.

CEE21 - Supply of Commercial Space and Redevelopment of Office Stock

To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses.

To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city.

CEE26 - Tourism in Dublin

To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the appropriate, balanced provision of tourism facilities and visitor attractions.

To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors and to promote Dublin as a setting for conventions and cultural events.

To improve the accessibility of tourism infrastructure to recognise the access needs of all visitors to our city.

CEE34 - Craft Enterprises

To recognise that craft enterprises, designers' studios/workshops etc., along with visitor centres, provide economic development and regeneration potential for the city, including the promotion of tourism. To promote Dublin city centre as a destination for such creative industries and for the cultural and artistic sectors.

2.3.1 Applicant's Response

We refer the Board to the Applicant's response submission, dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 6 – City Economy and Enterprise. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

It is acknowledged that there is significant under-utilisation within the entire Masterplan area. The proposed development forms part of a wider regeneration and development project, Dublin Central, planned for an area comprising almost three entire urban blocks located between O'Connell Street Upper, Parnell Street, Moore Street and Henry Street. There is significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment that will enhance the competitive position of Dublin city centre. This will include the integration and adaptive reuse of existing built fabric that is important to our sense cultural identity. The Masterplan seeks to inject new life through the sustainable regeneration and revitalisation of this area at the heart of Dublin City centre. The Site 4 proposal provides a new opportunity for the long awaited renewal and regeneration of the underutilised Dublin Central area, with mixed use development including retail, café / restaurant, residential and office units.

Site 4 proposes an extension to the National Monument at No. 18A Moore Street. The purpose of the extension is to provide an ancillary space for the National Monument with an independent entrance from the proposed public plaza. The provision of the extension will support the future role of the National Monument (No. 14 – 17 Moore Street) as a cultural hub / 1916 Commemorative Centre which is located outside the parameters of Site 4, further improving the tourism infrastructure on site.

2.4 Chapter 7 – The City Centre, Urban Village and Retail

The following policies / objectives identified in Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated the 11 January 2024, are: -

CCUV41 - New Infrastructure Development

Infrastructure projects in Dublin City should ensure placemaking outcomes through a design-led approach. Dublin City Council will work the relevant agencies / infrastructure providers to achieve public realm enhancements in the design, implementation and delivery of infrastructure projects.

CCUVO18 - Streets and Lanes Dublin 1

To work with city stakeholders including local businesses, and the BIDs group 'WeAreDublintown' to implement a number of public realm projects arising from the Re-Imagining Dublin One study and to extend best practice from these projects to other parts of Dublin 1 and the city. This includes the North Lotts Planning Study and the 'Reimagining Dublin One Laneways' project

CCUVO19 - Linking Office and Culture Clusters to the Retail Core

To devise a programme to enhance pedestrian amenities, encourage more street based activities and provide micro spaces along key routes from office and culture clusters to the retail core to enhance the vibrancy of the streetscape and to draw office workers and tourists into the retail core.

2.4.1 Applicant's Response

We refer the Board to the Applicant's response submission dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 7 – The City Centre, Urban Village and Retail. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

We wish to note that Policy CCUV41 - New Infrastructure Development does not apply to this development as it is not an infrastructure development.

A Scenario Testing & Development Design Report, prepared by Space Syntax, on existing pedestrian movement patterns and pedestrian numbers, underlines the inhibiting and impermeable nature of the existing Masterplan site in its current format for pedestrian movement. This has informed the design process. The site is in line with Objective CCUVO19 - Linking Office and Culture Clusters to the Retail Core through providing enhanced pedestrian amenities in Dublin's City Centre, as the Scenario Testing & Development Design Report concludes: -

"The Masterplan maximises footfall benefits to Moore Street by improving its connection to O'Connell Street via the new East West route, also linking the street to a large public space. The streets and spaces in the Masterplan are designed to cater to the significant increase in movement and maintain a high Pedestrian Comfort Level throughout the scheme and surrounding street network. The configuration of urban blocks in the new development creates a high degree of permeability and continuity of routes within the site. Consequently, pedestrian movement through the lanes is significantly improved. The location of retail and food & beverage land uses along the new routes will further serve to attract pedestrian movement through the development."

2.5 Chapter 8 – Sustainable Movement & Transport

The following policies / objectives identified in the Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated 11 January 2024, are: -

SMT8 - Public Realm Enhancements

To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.

SMT9 - Public Realm in New Developments

To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.

SMT12 - Pedestrians and Public Realm

To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.

SMT14 - City Centre Road Space

To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.

SMT22 - Key Sustainable Transport Projects

To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:

- DART +
- Metrolink from Charlemount to Swords
- BusConnects Core Bus Corridor projects
- Delivery of Luas to Finglas
- Progress and delivery of Luas to Poolbeg and Lucan

SMT27 - Car Parking in Residential and Mixed Use Developments

To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.

To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. To safeguard the residential parking component in mixed-use developments.

2.5.1 Applicant's Response

We refer the Board to the Applicant's response submission dated the 11 January 2024, for a full analysis on how Site 4 complies with the policies and objectives of Chapter 8 – Sustainable Movement & Transport. The following response address residual policies / objectives highlighted by Dublin City Council and key points of other submissions.

A Landscape / Public Realm Masterplan has been prepared by Gross Max Landscape Architects. The Landscape Masterplan Report, presents a cohesive landscaping concept is designed to tie the various Sites within the Masterplan together. Equally, it seeks to integrate with the existing street context, including Moore Street, O'Connell Street Upper, Parnell Street and Henry Street. Site 4 introduces the provision of a new archway on Moore Street to link Moore Street with Moore Lane via the proposed public plaza.

The area is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport, as generally described below: -

- Many of the streets in the immediate area have cycle lanes which provide direct access to the Dublin Strategic Cycle Network.

- There are several Dublin Bikes Stations in the vicinity at Jervis Street, Parnell Square North, Parnell Street, Princes Street and Cathal Brugha Street which are all within a 3 – 6 minute walk from the application site.
- The Luas Green line operates between Brides Glen at Cherrywood in Sandyford and Broombridge and the Luas Red Line operates between Saggart / Tallaght and the 3Arena / Connolly. The two lines intersect at the junction of O'Connell Street and Abbey Street adjacent to the south-east of the site due to the introduction of Luas Cross City. Red Luas and cross city Luas lines serve stops at Heuston Station, O'Connell Street and Parnell Square, which act as termini for numerous Dublin Bus services.
- Connolly Train Station is located c. 800 m (c. 10 – 12 minute walk) east of the site which allows interchange with DART services and Iarnród Éireann commuter services.
- Extensive bus services are available on O'Connell Street including Dublin Bus (31no. routes), private interurban routes and airport services. Aircoach operate a 24-hour service at 10-20 minute intervals through O'Connell Street from Sandyford, Greystones, Cork and Belfast. Citylink provides hourly services from Bachelor's Quay (c.200m) and Aston Quay (c. 400m) in each direction from Dublin Airport to Galway and Limerick. Wexford Bus operates frequent return services from Dublin Airport to Wexford via Custom House Quay (c. 700m) and George's Quay (c. 550m).
- O'Connell Street, Parnell Square East, Parnell Street and Parnell Square West to the north and east of the site are four of the essential primary links included in the proposed Bus Connects network.
- BusÁras is located c. 600m (c. 8 – 10 minute walk) east of the application site, which allows interchange with Dublin Bus services, Córas Iompair Éireann (CIÉ) regional bus services and private intercity bus services.
- A proposed Metrolink line (Metrolink Project – at railway order application stage) will provide for a high-capacity, high-frequency rail service between Dublin Airport and the LUAS Green Line at Charlemont, with stops proposed at both ends of O'Connell Street. Metrolink will have a stop under Site 2AB and Site 2C, the design of which will allow Metrolink to be developed independently by TII. The future development of Site 2AB and Site 2C will include Metrolink Enabling Works (MEW) to facilitate the future implementation of the Metrolink Station (see Section 6 of the Planning Report submitted as part of the application for further detail).

No car parking is proposed as part of Site 4. As noted above, the site is exceptionally well located adjacent a number of modes of public transport. DCC Transportation Department as part of Pre-Planning dialogue that the provision of no parking was acceptable given the location of the site.

We refer the Board to the Transport Assessment – Vol. 3: Overall Development and Travel Plan, prepared by Waterman Moylan Consulting Engineers as submitted with the planning application, in respect of existing and future public transport, pedestrian and cycling links to the site.

2.6 Chapter 11 – Built Heritage and Archaeology

The submissions from Dublin City Council, Mary Lou McDonald TD, Sinn Féin Group and the Moore Street Preservation Trust all refer to the recent additions along Henry Place and Moore Street to the Record of Protected Structures.

Shane Stokes discusses Chapter 11 – Built Heritage and Archaeology in detail, asserting that the scheme does not comply with the objectives of Chapter 11, the need to retain historic fabric, and protect the O'Connell Street Architectural Conservation Area (ACA). The submission asserts that Moore Street is a priority Architectural Conservation Area (ACA) and that the scheme does not comply with the O'Connell Street ACA.

The following policies / objectives identified in the Dublin City Council submission, not already addressed in the Applicant's submission to the Board dated 11 January 2024, are: -

BHA6 - Buildings on Historic Maps

That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report that it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

BHA8 - Demolition in an ACA

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA10 - Demolition in a Conservation Area

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of a Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.

BHA14 - Mews

To promote the redevelopment and regeneration of mews lanes, including those in the north and south Georgian core, for sensitively designed, appropriately scaled, infill residential development, that restores historic fabric where possible, and that removes inappropriate backland car parking areas.

BHA18 - Historic Ground Surfaces, Street Furniture and Public Realm

To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts, and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on Paving: The Conservation of Historic Ground Surfaces (2015).

To maintain schedules of stone setts, historic kerbing and historic pavers/flags, and associated features in the public realm, to be protected, conserved or reintroduced (Appendix 6), and to update and review these schedules during the period of this development plan.

BHA21 - Retrofitting Sustainability Measures

To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage- Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings.

BHA22 - Upgrading Environmental Performance

To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:

- *The significance of the structure, and*

- *The extent of intervention, including impact on historic fabric, the technical requirements of a traditionally constructed building, visibility, siting and design.*
- *The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.*

2.6.1 Applicant's Response



We refer the Board in the first instance, to the Applicants response to the Section 137 request as submitted on the 11 January 2024 for a full analysis on how Site 4 complies with the policies and objectives of Chapter 11 – Built Heritage and Archaeology.



There is extensive volume of material relating to the identification and qualification of architectural heritage associated with Site 4 and of the Dublin Central Masterplan accompanying the planning application in this case. We trust the Board will have regard to same in their consideration of this appeal. It is not proposed to re-state all of that voluminous material here to avoid unnecessary repetition. As noted in the previous Section 137 response, since the submission of this planning application for Site 4 and subsequent appeals, No. 10 Moore Street, No. 12 Moore Street, No. 13 Moore Street, Nos. 17 – 18 Henry Place and Nos. 20 – 21 Moore Street have been added to the Record of Protected Structures. For the convenience of the Board, attached with this submission is a copy of the Reports of Dublin City Council in respect of these properties relative to Site 4 that were confirmed by a vote of Dublin City Council on the 7 November 2022 and which clarifies the extent of the Protected Structure in each case, including its curtilage. We trust the Board will verify this position with the Planning Authority.

We refer the Board to the Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects, as submitted with the planning application. In particular Appendices A4.3, A4.4, A4.5 A4.6 and A4.10 which describes the Protected Structures in great detail. In particular, the Board will note that Appendix A4.11 included an assignment of significance to certain upstanding building fabric and which included an assessment of the buildings, now included on the Record of Protected Structures. In the context of Site 4 and in recognition of the Applicant's identification of these structures as having heritage significance, the Board will note that the assessment of Architectural Heritage was undertaken largely on the basis as if the above properties were already on the Record of Protected Structures. Further fabric of significance, notably Nos. 6 – 7 Moore Lane, were also voluntarily retained, safeguarded and integrated on the same principle.

The following table is an extract from section 15.1.1.1 of Chapter 15 of the EIAR as submitted as part of the application. The Board is invited to also refer to Appendix A4 of the Dublin Central Masterplan Area Conservation Management Plan for further detail on the contribution of Site 4 to the urban battlefield of 1916. We also refer to the demolition drawings prepared by ACME Architects as submitted as part of the application which show the extent of demolition proposed at each of these protected structures. An extract from Appendix A4.11 of the Architectural Heritage Impact Assessment prepared by Molloy & Associates Conservation Architects is set out below for convenience: -

Structure	Assigned Significance	Brief Description	Proposed Development Rationale
10 Moore Street * Building denoted in Fig.15.4.1 by a red asterisk - described in greater detail in a report within the Architectural Heritage Impact Assessment attached to a planning	Of high significance Rear attached buildings are of	<i>Architectural, historical significance</i> Three-storey-over-basement, two-bay brick-fronted premises facing Moore Street with south elevation to Henry Place. Red brick facade laid in Flemish bond to front and yellow brick English garden	Main house to be adapted for use as apartments over retail.

application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.	limited / no significance	<p>wall bond to south elevation, granite coping.</p> <p>The square-headed window opens to the upper floors are replacement timber casements. The ground floor shopfront has been replaced. Brick frontages suggest a late-19th or early 20th century date and the building was substantially upgraded in 1950. However, there is evidence internally that early fabric survives within the building.</p>	
12 Moore Street	<p>Building of limited/ no significance</p> <p>Party wall with No.13 of high significance</p>	<p><i>Three-storey, two-bay brick-fronted premises. Red brick facade laid in stretcher bond. Flat roof. Modern shop front to ground floor. Aluminum casement windows to upper floors. Built c.1960 as a grocery and subsumed into the adjacent KC Confectionery building in the early 1970s.</i></p> <p><i>A surviving party wall shared with No.13 Moore Street is 18th century in origin but visible only from within No.13.</i></p> <p><i>No evidence of early fabric survives elsewhere.</i></p>	<p>Building to be demolished and site redeveloped</p> <p>The party wall to be retained.</p> 
13 Moore Street	<p>Building of limited/ no significance</p> <p>Party wall with No.12 of high significance</p>	<p>Two-storey, two-bay brick fronted building with flat roof. Red brick facade laid in English garden wall bond surmounted by granite coping. Blind facade to second floor and blind windows to first floor. Modern shop front to ground floor level.</p> <p>The building was rebuilt in the 1960s for the Kylemore Bakery.</p> <p>A surviving party wall shared with No.12 Moore Street is 18th century in origin and presents with two possible creep holes.</p>	Building to be demolished and site redeveloped

			 <p>The party wall to be retained.</p>
<p>Nos 20 – 21 Moore Street</p> <p>* Building denoted in Fig.15.4.1 by a red asterisk - described in greater detail in a report within the Architectural Heritage Impact Assessment attached to a planning application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.</p>	<p>Of high significance</p>	<p><i>Nos.20-21 Moore Street are 18th century in origin with later interventions. Whilst extensively modified, with many early features lost, their early building forms are still legible, rendering a credible assignment of architectural significance as two buildings within an 18th century terrace.</i></p>	<p>Main houses to be adapted for use as apartments over retail. Rear structures at 12 Moore Lane to be demolished to make way for public square</p> 

It is a key objective of the Development Plan Core Strategy to protect and enhance the special characteristics of the city's built and natural heritage. The principal measures enabling Dublin City Council to achieve this objective is the Record of Protected Structures and the designation of Architectural Conservation Areas. The City Council has identified priority areas of special historic and architectural interest and within these areas will review the Record of Protected Structures, consider the recommendations of the National Inventory of Architectural Heritage and, where required, designate Architectural Conservation Areas. O'Connell Street & Environs is designated as an ACA. Site 4 itself lies outside the O'Connell Street ACA. We also wish to note that Moore Street is not currently an ACA under the Development Plan nor has the formal process of varying the Development Plan to include any additional ACA's commenced at the time of making this submission.

The Masterplan aims to tackle the issue around vacancy within the city centre. It aims to re-use existing building stock through refurbishment and retrofitting in so far as possible. It was noted by the Planning Authority that the development will support the principle of bringing of upper floors into active use, reducing vacancy and rehabilitating and reusing existing older buildings.

2.7 Chapter 12 – Culture

The submissions made by the Moore Street Preservation Trust, Shane Stokes and the Relatives of the Signatories of the 1916 Proclamation all refer to Objective CU09 of the Development Plan. The

Applicant did not respond specifically to this objective in its Section 137 response submission dated 11 January 2024. A response is now provided to Objective CU09 of the Development Plan below.

The following further policies / objectives identified in the Dublin City Council submission that have not already been addressed by the Applicant in its 11 January 2024 response submission, are: -

CU2 - Cultural Infrastructure

To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.

CU4 - Cultural Resources

To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.

CU9 - Parnell Square and North Inner City Cultural Cluster

To promote and support the growth of the Parnell Square and North Inner City cultural cluster to facilitate opportunities that provide benefits both to the wider City and to the economic growth and regeneration for the NEIC that supports artists, mitigates social exclusion and increases opportunities for expression and artistic engagement for the diverse local community and in particular, young people.

CU13 - Protection of Cultural Uses

To protect cultural uses within the city that have been negatively impacted by the Covid pandemic and seek to preserve such spaces so they are not lost to the city as a result of the economic impact of the extended closure during the pandemic.

CU20 - Cultural Activities in the Evening

To support the growth in cultural activities within the city and to encourage cultural institutions and amenities within the city to operate into early evening time on a regular basis, and to explore the development of more regular evening cultural experiences on a pilot basis.

CU21 - Night Time Economy Taskforce Report

To be guided by the recommendations set out in the National Night Time Economy Taskforce Report 2021 and to seek that Dublin is selected as a pilot for the creation of a Night Time Advisor and stakeholder committee.

CU09 - 14-17 Moore Street

To Support the preservation and restoration of the historic terrace 10-25 Moore Street and adjacent yards and lanes, and the remaining historic built heritage of the street, including numbers 18 Moore Street and the establishment of a commemorative visitor centre, as a fitting tribute to the men and women of the Easter 1916 and as an educational and cultural resource centre and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report, OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform.

CU026 - Demolition or Replacement of a Use of Cultural Value

Where applications are made seeking to demolish or replace a cultural space/use, the development must re-accommodate the same or increased volume of space/use or a similar use within the redevelopment. Cultural uses include theatres, cinemas, artist studios, performance spaces, music venues, nightclubs, studios and dance space.

CUO39 - Purpose Built Spaces for Evening and Night Time Activities

To encourage the opportunity presented by new larger developments, including a requirement for all new large hotels and aparthotels*, within the city to provide high quality, designed for purpose spaces that can accommodate evening and night time activities, such as basement/roof level "black box" spaces that can be used for smaller scale performances/theatre/music/dance venues, and/or for flexibility in the design of larger spaces, such as conference spaces, to be adaptable for evening and night-time uses.*

**Over 100 bedrooms*

2.7.1 Applicant's Response

We refer the Board in the first instance, to the Applicants response to the Section 137 request as submitted on the 11 January 2024 for a full analysis on how Site 4 complies with the policies and objectives of Chapter 12 – Culture. The following response addresses the residual objectives / policies highlighted by Dublin City Council and the key points of other submissions.

We refer to section 2.7 of the 11 January 2024 submission, which provides a breakdown of all the proposed cultural uses across the Masterplan. The Masterplan, as implemented through the planning applications for the Site 4 and other site proposals, helps to make Dublin City Centre a culturally vibrant, creative and diverse city. Site 4 / Dublin Central Masterplan lands are located on one of Ireland's premier streets at the heart of the city centre, with access to an abundance of community, arts and cultural spaces including Parnell Square, a new cultural quarter.

The proposed development provides a ranges of active uses at ground floor to encourage activity throughout the day and into the night. This approach has been replicated across the Masterplan and was considered by the Planning Authority to be acceptable. The range, balance and configuration of uses proposed for Site 4 can serve to attract and sustain desirable activity during the day and night, to create a City Centre destination that is commercially competitive and attractive, inclusive and vibrant.

We refer the board to the response to CUO9 - 14-17 Moore Street below, prepared by Dublin Central's Conservation Architects Molloy & Associates. By way of framing a response, each component of the Objective is analysed below:

The preservation and restoration of the historic terrace 10-25 Moore Street

The applicant supported a forensic analysis of this section of Moore Street at an early stage in the design process, mapping the position and known extent of pre-1916 building fabric, as a basis for its collective retention, safeguarding and presentation within the proposed redevelopment of plots containing post-1916 building fabric.

The preservation and restoration of adjacent yards and lanes

The legibility and enhanced expression of Moore Lane and Henry Place is a central design objective of the Dublin Central Masterplan. It is accepted that the mergence of historic laneways and yards within the building blocks of Site 3 and Sites 4- 5, reflects their infilling and amalgamation as has occurred over the course of time since 1916. The viability of the three developments to an extent relies on the continuance of this adopted tradition, whilst preserving, restoring and presenting building fabric of significance.

The preservation and restoration of the remaining historic built heritage of the street, including numbers 1-8 Moore Street

Historic building fabric, not mentioned in this Objective, namely the voluntary retention, restoration and presentation of Nos 7-8 Moore Lane, together with street surfaces and kerbing, has been carefully identified as requiring preservation and integration within the proposed development. For reasons cited in MOLA's Design Statement submitted as part of the planning application for Site 3, the demolition of Nos 1-8 Moore Street is proposed, whilst retaining No.9 Moore Street (which is considered of comparable significance to No.10 Moore Street- yet remains excluded from the RPS) and Nos 9-11 Henry Place.

The establishment of a commemorative visitor centre

Whilst the establishment of this centre falls outside the remit of the applicant, it has made every effort to consider the National Monument and its setting within the overall masterplan including the provision of upgraded and new public realm. All considerations given to the National Monument take account of the contents and relevant recommendations of the Moore Street Advisory Group Report, OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform

The design team consulted at all stages of the design process with cited statutory stakeholders, considering feedback and addressing concerns.

2.8 Chapter 13 – Strategic Development Regeneration Area

Shane Stokes quotes the requirements of the SDRA in his submission.

The following objective listed by Dublin City Council was not name checked by the Applicant in the Section 137 response (11 January 2024), but we would submit that its general provisions have been considered at length through the application and appeal stages : -

SDRA01 (Objective) - *To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:*

Architectural Design and Urban Design: *All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.*

Phasing: *Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.*

Access and Permeability: *Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*

Height: *Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.*

Urban Greening and Biodiversity: *Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.*

Surface Water Management: *All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This*

should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail.

Flood Risk: *All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.*

River Restoration: *Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.*

Sustainable Energy: *Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.*

Climate Change: *Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.*

Cultural Infrastructure: *All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.*

2.8.1 Applicant's Response

The application site falls within the Strategic Development Regeneration Areas (SDRA) 10 – Northeast Inner City (NEIC) of the current Development Plan. We wish to acknowledge that masterplans should incorporate heritage-led retention and restoration of all pre-1916 buildings and fabric along Moore Street. The Dublin Central Masterplan seeks to optimise the regeneration opportunities presented by the central location, accessibility, architectural heritage features and cultural identity of O'Connell Street and environs, including Henry Street, Moore Street and Moore Lane. We refer to the Masterplan Design Statement, prepared by ACME Architects and to the accompanying Architectural Heritage assessments prepared by Molloy & Associates, Conservation Architects which address the heritage led approach of the masterplan. Chapter 13 also notes that proposals should respond to The policies and provisions of the O'Connell Street Architectural Conservation Area (ACA), 2001, and the Scheme of Special Planning Control for O'Connell Street & Environs 2016, including any amendments thereto, along with those of the proposed Draft Moore Street Architectural Conservation Area or similar where adopted. The Draft Moore Street Architectural Conservation Area has not yet been adopted and Site 4 itself lies outside the O'Connell Street ACA.

We refer the Board to section 2.8.2 of the Section 137 response (11 January 2024), which demonstrates how the scheme is compliant with SDRA 10. It should be noted that in the DCC submission it is noted that the proposal "would support and be in accordance with a number of policies and related objectives

of the Dublin City Development Plan 2022-2028; in particular policy SDRAO1 and the guiding principals under SDRA10”.

We refer to the applicant’s response to Objective SDRAO1 below:

- **Architectural Design and Urban Design:** The development is of high quality and adheres to key architectural and urban design principles set out in Chapter 15. We refer the Board to the Masterplan Design Statement, prepared by ACME Architects submitted at application stage which sets out the frameworks for the redevelopment of the overall land holding, as well as the Architectural Design Statement for Site 4 also prepared by ACME Architects.
- **Phasing:** We refer the Board to the Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers submitted with the planning application for Site 4 for further details on different stages of construction, co-ordinated as necessary with other planned works that may take place during the planned construction period.
- **Access and Permeability:** The proposed development ensures adequate permeability and connectivity to the surrounding city centre area and public transport infrastructure. Site permeability and connectivity to the wider Masterplan area that includes well-designed public realm will drive footfall, increase dwell time and activate the interior of this urban block, in addition to sustaining active uses at Henry Street and Moore Street. Site 4 as a component of the wider Dublin Central masterplan has been designed to meet the mobility needs and convenience of all. The scheme delivers good permeability throughout allowing all-inclusive access without compromising the existing historical character. We refer to the Scenario Testing & Design Development Report, prepared by Space Syntax.
- **Height:** Site 4 comprises buildings of 2 – 3 storeys in height. The Planning Authority generally welcomes the modulation of massing and height across Site 4, whereby the massing of the overall development has been broken down into a number of smaller elements, respecting historic building height at street edges and plot widths, and the scale of the existing surrounding built environment.
- **Urban Greening and Biodiversity:** The landscape of the Dublin Central site has informed the overall landscaping plans for the area. The scheme provides good connectivity and enhances biodiversity within the city centre environment. The Site 4 proposal is considered in the context of the Dublin Central Landscape Masterplan, prepared by Gross Max Landscape Architects. The landscape masterplan is guided by an overall design vision, which includes the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions. The Site 4 proposal will be accessible to the enhanced network of existing and proposed public streets and spaces within the wider Dublin Central Masterplan area.
- **Surface Water Management:** The proposed design maximises sustainable energy uses and materials, it incorporates appropriate SuDS measures and seeks to enhance biodiversity as a component part of the wider Dublin Central Masterplan area.
- **River Restoration:** Not applicable to Dublin Central site.
- **Sustainable Energy:** It is noted that a key climate mitigation action for all new development relates to the need to reduce energy demand, to increase energy efficiency and to provide renewable energy on-site if possible. We refer the Board to the Dublin Central – Site 4 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers which accompanied the planning application. The proposal contained in the BDP Report aligns with the requirements set out above. It identifies that *“The Dublin Central Site 4 project is aspiring to be one of Ireland’s first Net Zero Carbon schemes offering residents, visitors and guests a low carbon footprint alternative for Dublin.”* There will also be zero fossil fuels used on site throughout construction.
- **Climate Change:** As above.
- **Cultural Infrastructure:** See response in Section 2.8.2 of the Section 137 request as submitted on the 11 January 2024.

2.9 Chapter 15 – Development Standards

There were a number of sections from Chapter 15 mentioned in Dublin City Councils Submission which the applicant did not specifically respond to in the Section 137 response issued to the Board on the 11 January 2024, these are noted in sections 2.10.1.1 to 2.10.1.13 below.

2.9.1 Applicant's Response

Firstly, we would highlight that Chapter 15 of the Development Plan set out Development Standards and that the Development Plan states that *"The guidance and principles set out are intended as a guide to prospective applicants as to how new development should stimulate responsive and innovative design in the city."* As such all the below are guidance rather than policies or objectives which must be adhered to.

2.9.1.1 Section 15.3 - Environmental Assessment – EIA/AA/Ecological Impact Assessment

An Environmental Impact Assessment Report, co-ordinated by Stephen Little and Associates and a Appropriate Assessment Report, prepared by Scott Cawley were prepared as part of the application for Site 4 submitted at application stage and reconsidered at Further Information stage. We refer to board to the same.

2.9.1.2 Section 15.4 - Key Design Principals

For a comprehensive response in relation to Healthy Place Making, Architectural Design Quality, Sustainable and Climate Action and Inclusivity and Accessibility we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

However, in relation to safe and secure design, the design of Site 4 and the overall masterplan promotes safety and security through passive surveillance, avoiding blank facades and providing adequate lighting.

The design statement prepared by ACME at application stage notes that *"The external lighting Provides a safe environment for pedestrians, cyclists and moving vehicles, to deter anti-social behaviour" and "The new public square is overlooked by the office uses within Sites 5, 2C and 2B, and from the commercial uses to the south within Site 4. It will also be overlooked by the apartments within Nos. 20-21 Moore Street, also within Site 4. The new square is designed to be used by the wider community within central Dublin, rather than only the residents of or workers in the Masterplan."*

2.9.1.3 Section 15.5 - Site Characteristics and Design Parameters

For a comprehensive response in relation to Brownfield, Regeneration sites, Height, Density, plot ratio, Architectural Design Statements, Models and Photomontages we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

The standards set out under 15.5.2 infill development is not relevant to this application. In terms of alterations and retrofitting non-domestic buildings, the proposed development at Site 4, as a component of the wider Dublin Central Masterplan, aims to tackle the issue around vacancy within the city centre. It seeks to re-use or integrated existing building stock through refurbishment and retrofitting in so far as possible. It will deliver active residential use at upper floors and integrate existing built fabric in a manner that is supported by the planning authority. The conservation approach also seeks to ensure that protected structures and other buildings of historic significance are brought into viable re-use, instilling new life and activity into what was hitherto unusable floor space notwithstanding its location overlooking one of Dublin's shopping streets. In relation to Materials and Finishes, the proposed new buildings complement the existing material palette and propose similar high-quality and self-finished materials to preserve the character of the ACA. We refer the Board to

the Architectural material submitted at application stage and Further Information stage for more details on this.

2.9.1.4 Section 15.6 - Green Infrastructure

For a comprehensive response in relation to the introduction of section 15.6 we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

Site 4 is considered in the context of the Dublin Central Landscape Masterplan, prepared by Gross Max Landscape Architects. The landscape masterplan is guided by an overall design vision, which includes the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions. The proposed design incorporates appropriate SuDS measures and seeks to enhance biodiversity as a component part of the wider Dublin Central Masterplan area.

2.9.1.5 Section 15.7 - Climate Action

For a comprehensive response in relation to Climate Action and Energy Statement we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

As noted in section 2.10.1.3 above the scheme seeks to re-use or integrated existing building stock through refurbishment and retrofitting in so far as possible.

An extensive Energy and Sustainability statement was prepared by BDP at planning application stage. This confirms that *"It is not practical to feed the entire scheme with on-site renewable electricity."* However, *"the energy usage of Site 4 is minimised through a number of key measures. Preference is given to the use of passive measures to minimise the buildings demand for energy and these measures are then supported by active energy systems that generate and distribute energy in an efficient way."*

These measures include the following:

- *The level of insulation and unwanted air leakage control will be excellent. The design team will minimise air leakage and check construction quality by closely monitoring the constructions on site. Ultimately the air leakage and insulation levels will be tested through the use of air leakage and thermography tests.*
- *The ratio of solid to glazed areas have been carefully designed for each facade and orientation in order to achieve an appropriate balance between natural light, ventilation, heat gain and heat loss.*
- *The buildings and external lighting systems are intended to be entirely LED based.*
- *The air and water systems are designed to vary their output in proportion to the demand in order to minimise their energy usage.*
- *Fresh air systems are fitted with heat recovery systems, offering the recovery of waste heat energy.*
- *Heating and hot water is generated through highly efficient air source heat pumps in order to completely remove the carbon impact of heating and hot water.*
- *Solar Photovoltaics at roof level of all buildings are provided to generate clean renewable on-site energy.*
- *Information on the key technologies used to reduce the energy consumption of the building will be given to residents to encourage the promotion of sustainable construction."*

2.9.1.6 Section 15.8 - Residential Development

In relation to quality housing and sustainable neighbourhoods we refer the board to Section 2.2.1 above in response to Chapter 5.

The application did not provide a social and community audit however the proposed site proposed 11no. apartment units which is below the threshold to provide a social and community audit under the Development Plan.

As discussed elsewhere in this report, and at length in the planning application report and appeal submissions, Site 4 is a mixed use scheme and well connected to a wide range of city centre amenities and services.

2.9.1.7 Section 15.9 - Apartment Standards

For a response in relation to unit mix we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

For all a response to all other apartment standards we refer to the Planning Application Reports, prepared by Stephen Little and Associates, submitted to Dublin City Council at planning application and further information stages.

2.9.1.8 Section 15.13 - Other Residential Typologies

The majority of Section 15.13 of the Development Plan is not applicable to the Site 4 proposal or to the Dublin Central Masterplan, as the proposed scheme does not include student accommodation, shared accommodation, care homes, etc.

However, Section 15.13.6 relating to living over the shop requires that Dublin City Council will actively encourage the development of residential accommodation over existing commercial premises. It is identified that there is a considerable amount of vacancy and underutilised floorspace on the upper floors of commercial premises that have the capacity to contribute significantly to the housing stock of the city. The proposed development at Site 4 and the Dublin Central Masterplan seeks to reduce existing vacancy and underutilised floorspace within the Masterplan area, and is consistent with Section 15.13.6 of the Development Plan.

2.9.1.9 Section 15.14 - Commercial Development / Miscellaneous

Sub sections 15.14.4 – Offices and 15.14.7 – Retail and Food & Beverage, of the Development Plan, are all relevant to the proposed development at Site 4 and the overall Masterplan.

The Planning Authority raised no concern with the range of proposed uses at Site 4, these uses being *“considered to be acceptable”*.

Through offering a more dynamic retail, food & beverage and leisure offering in the city centre, Site 4 provides an opportunity in the Dublin City Retail Core to evolve in a mixed-use sustainable manner and create a destination for people to linger, stay, live, shop, work and socialise during the day and at night time. As recommended in Section 15.14.4 – Offices of the Development Plan, the proposed scheme was accompanied by an Architectural Design Statement, this was prepared by ACME Architects at application stage and refined through Further Information stage. All relevant standards identified in Section 15.14.7 – Retail and Food & Beverage of the Development Plan have been appropriately considered as part of the application at both application stage and further information stage. We refer the Board to the planning documents as submitted at these stages, which have been furnished to it by Dublin City Council.

2.9.1.10 Section 15.15 Built Heritage and Archaeology

In response to section 15.15 of the Development Plan regarding Built Heritage and Archaeology we refer the Board to the previous sections of this response report and other documents identified as follows: -

- Section 2.6 above.

- Section 2.6 of the Section 137 response issued to the Board on the 11 January 2024.
- Masterplan Conservation Plan, prepared by Molloy & Associates Conservation Architects as submitted at planning application stage.
- Chapter 15 and 16 of the Environmental Impact Assessment Report, prepared by Stephen Little & Associates Town Planning and Development Consultants as submitted at planning application stage.
- Site 4 Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects as submitted at planning application stage.
- Site 4 Archaeological Impact Assessment, prepared by Courtney Derry Heritage Consultants as submitted at planning application stage.
- Site 4 Architectural Conservation Further Information Responses, prepared by Molloy & Associates Conservation Architects as submitted at Further Information Stage.

2.9.1.11 Section 15.16 Sustainable Movement and Transport

We refer the board to Section 2.5 above and section 2.5 of the Section 137 response issued to the Board on the 11 January 2024, for a response in relation to sustainable movement and transport.

We also refer to the various transportation reports submitted at planning application stage for Site 4 and the Masterplan.

2.9.1.12 Section 15.17 - Public Realm

For a response in relation to Shopfront and Façade Design we refer the Board to section 2.9.16 of the Section 137 response issued to the Board on the 11 January 2024.

In relation to Public realm it is also worth noting the Fáilte Ireland made a submission on the Site 4 and noted the following:-

"The importance of Dublin as Ireland's primary national gateway and as an international city attracting both domestic and foreign investment, with a vibrant tourism sector, and the revenue generated by this is noted. It is considered that the proposal would contribute positively to the Dublin tourism brand by reason of quality urban design and placemaking, which will facilitate vibrancy and animation during both day and night time and provision of public realm enhancements and new public spaces in the city centre, strengthening the night time economy which is considered an important aspect of revitalising the city centre, by complementing the retail offering and offering cultural experiences appealing to residents and visitors, and by improved orientation and navigation as a result of enhanced permeability and an improved public realm."

The Dublin Central Masterplan, including Site 4 will add to the public realms of this city centre site, enhancing the benefit and enjoyment of the locality and offer a range of various activities. The open spaces, both public and private, create a sense of place and uses high quality material and finishes throughout, the orientation and design of the site maximises daylight and sunlight availability across the development.

2.9.1.13 Section 15.18 - Environmental Management

We refer the Board to the various environmental management reports as submitted at application stage for the Masterplan and Site 4, these are as follows:

- Preliminary Construction Traffic Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.

- Masterplan Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Overall Development – Basement Impact Assessment, prepared by Waterman Structures Limited.
- Engineering Drawings, prepared by Waterman Moylan Consulting Engineers.
- Site 4 Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers Limited.
- Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Preliminary Construction Traffic Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Outline Construction & Demolition Management Plan, prepared by Waterman Moylan Consulting Engineers Limited.
- Site 4 Basement Impact Assessment, prepared by Waterman Structures Limited.
- Site 4 Structural Report, prepared by Waterman Structures Limited.
- Site 4 Subterranean Construction Method Statement, prepared by Waterman Structures Limited.
- Construction & Demolition Waste Management Plan (enclosed in Appendix 14.1 of the accompanying EIAR), prepared by AWN Consulting.
- Operational Waste Management Plan (enclosed in Appendix 14.2 of the accompanying EIAR), prepared by AWN Consulting.
- Telecommunications Report, prepared Independent Site Management Ltd.
- Site 4 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers.

3 CONCLUSION

We do not consider that the submissions made to the Board, in respect of the Applicant's Further Information submission dated 11 January 2024, raise any significant new issues that the Applicant and the Planning Authority have not already comprehensively dealt with through the Planning Application, Further Information and appeal process.

It remains our opinion that the proposed Site 4 scheme as presented to the Board under ABP Ref. ABP-312642-22 is consistent with all of the relevant policies and objectives of the Dublin City Development Plan 2022 – 2028.

STEPHEN LITTLE & ASSOCIATES

12 February 2024

