

File With _____

SECTION 131 FORM

Appeal NO: ABP 312642-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 11/1/24
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): circulate as
Per Board directionE.O.: Lisa DDate: 12/1/24

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 C. CarletonPlease prepare BP 70 - Section 131 notice enclosing a copy of the attached
submissionto: all Task No: _____Allow 2/3/4 weeks – BP 3EO: Liz CullenDate: 23-01-24AA: Cathy CarletonDate: 23/01/24

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 312642-22

M _____

Please treat correspondence received on 11/1/24 - email as follows:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with BP 233. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Board's letter ☐

Amendments/Comments

Applicants Response
to S134

4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☒EO: Risa QPlans Date Stamped ☐Date Stamped Filled in ☐AA: Cathy CarahanDate: 12/1/24Date: 12/1/24

James Sweeney

From: Naoise O'Connor <naoiseoconnor@sla-pdc.com>
Sent: Thursday 11 January 2024 15:19
To: Appeals2; Bord
Cc: SLA Dublin Central
Subject: ABP Ref. 312642-22 - Response to Section 137 Request - Dublin Central Site 4
Attachments: 20035 Cover Letter DC S4 Section 137 request.pdf; 20035 Dublin Central Site 4 S137 Response 11012024.pdf; 10 Moore Street, Dublin 1 .pdf; 12 Moore Street, Dublin 1 .pdf; 13 Moore Street, Dublin 1 .pdf; 17-18 Henry Place, Dublin 1 .pdf; 20-21 Moore Street, Dublin 1 .pdf

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 response to the Section 137 request for ABP Ref 312642-22 as issued by An Board Pleanála on the 13th December 2023.

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

t. 353-1-676 6507
e. naoiseoconnor@sla-pdc.com
w. www.sla-pdc.com/

[Call me on teams](#)
[Message me on teams](#)



The SLA team have embraced hybrid working and continue to engage with our clients and colleagues in the industry through this new arrangement.

We value our team and are seeking to maintain/improve an appropriate Work/Life balance. As such, whilst it may suit us to respond on occasion, please do not anticipate a response to your email outside of normal working hours as the norm.

To ensure the most efficient use of resources, attendance at meetings will continue using various digital formats, including Microsoft Teams and Zoom.

DISCLAIMER--

This information transmitted in this email and any files transmitted with may be confidential. It is intended for the sole use of the addressee only. If you are not the intended recipient you are not authorised to read, copy or use the e-mail or any attachment. Stephen Little & Associates do not accept liability for, or permit; the creation of contracts on its behalf by e-mail, the publication of any defamatory statement by its employees by e-mail or changes subsequently made to the original message. This communication represents the originator's personal views and opinions that do not necessarily reflect those of Stephen Little & Associates.

Stephen Little & Associates do not accept liability for damage sustained as a result of malicious software (e.g. viruses). If you have received this e-mail in error, please notify the sender by return e-mail and then destroy it.

Stephen Little & Associates Ltd. trading as Stephen Little & Associates is Registered in Ireland No. 367533, and has its registered office at 26/27 Upper Pembroke Street, Dublin 2 D02 X361. Company Directors: Stephen Little (Managing), Melanie Little.

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

Our Ref. 20035

11 January 2024

RE: RESPONSE TO SECTION 137 REQUEST

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,

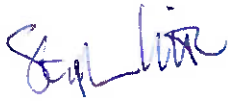
We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our Client (the Applicant), Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576 to submit this response to the section 137 request as issued by An Board Pleanála on the 13th December 2023. The following documents are enclosed with this response:

- Response to Section 137 Report, Prepared by Stephen Little and Associates;
- 17-18 Henry Place, report from DCC Conservation Section, 29 June 2022;
- 10 Moore Street, report from DCC Conservation Section, 29 June 2022;
- 12 Moore Street, report from DCC Conservation Section, 29 June 2022;
- 13 Moore Street, report from DCC Conservation Section, 29 June 2022;
- 20-21 Moore Street, report from DCC Conservation Section, 29 June 2022.

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

Conservation Section, Planning & Property Development Department
Civic Offices, Wood Quay, Dublin 8

An Rannóg Caomhantais, An Roinn Pleanála agus Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Email: conservation@dublincity.ie T. 01 222 3927

29 June 2022 (updated from previous report of 15 March 2022)

To the Chairperson and Members of the Central Area Committee

Initiation of the Statutory Process for the Proposed Addition of 10 Moore Street, Dublin 1, to the Record of Protected Structures in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended).

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

Photograph of Structure



Requests and Reasons for Addition

- The Elected Members of Dublin City Council at the monthly council meeting held on 8th June 2015, passed a motion put forward by Councillor John Lyons (Motion 44): *“That the following 1916 Buildings (Add 569), identified in the Franc Myles Battlefield Report, commissioned by Shaffrey Associates on behalf of Chartered Land, be added to the list of protected structures as buildings of National historical importance. 1 .O’ Briens Mineral Water Building, Henry Place - Occupied by volunteers. 2 .The White House, Henry Place - Occupied and held by Michael Collins. 3. No.10 Moore Street - Point of entry -The First Council of War - Overnight stay. 4. The Bottling Stores rear. 10 Moore Street and Moore Lane - Occupied by Frank Henderson. 5. Hanlons, 20/21 Moore Street - Surrender order accepted by volunteers after*

consultation with Thomas Clarke, Joseph Plunkett, Michael Collins and Sean Mac Diarmada”.

- Requested by Donna Cooney on 09 December 2015 as part of Draft Dev Plan 2016-22 (Submission 2564). ‘I would recommend the listing of all the houses on Moore Street from No.10 through to the last house on the terrace to keep the character of the street scape at the site of the National Monument 14-17 Moore Street’.

The five structures referred to in the first bullet point above have been assessed individually with a separate report for each. 10 Moore Street, Dublin 1, forms the subject of this report.

Location and Land Use Zoning:

The subject structure is located in an area zoned Z5, the objective of which is: “To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity”.



Figure 1: Site Location and Land Use Zoning

Architectural Conservation Area:

10 Moore Street is not within an Architectural Conservation Area, but lies adjacent to the designated O'Connell Street ACA (2001); shown in diagonal green coloured cross hatch on Figure 1, above.

Relevant Planning History:

Planning Ref.	Description	Decision Date
1355/98	The Project includes two floors of car-parking below basement level (capacity 720 cars); four floors of mixed Retail and Leisure uses (approx. 40,000 sq.m. gross floor area) and comprising of Department Stores, retail units, restaurants, bars, family entertainment centre and tourist information. Also, on the upper level there are 15 multi- purpose auditoriums for cinema, conference and theatre uses. There is also a 61 bedroom hotel with associated function rooms at 46/49 Upper O'Connell Street which is presently occupied by Fingal County Council. The proposal involves building under, on and over part of Moore Lane. The listed facades of Nos. 57, 58 and Nos.52/54 Upper O'Connell Street are being retained as part of the development.	Grant Permission: 23/10/1998

Planning Ref.	Description	Decision Date
2479/08	<p><i>Description has been abbreviated</i></p> <p>7 year permission for development at an overall site of c 2.17 hectares, at nos 40-41, 42 (a protected structure), 43 (a protected structure), 44 (a protected structure), 45-51, 52-54 (protected structures), 55-56, 57 (a protected structure), 58 (a protected structure), 59, 60 (a protected structure) and 61 (a protected structure) and 60a (otherwise 5 Henry Place) O'Connell Street Upper, Nos 37-41a Henry Street, nos 1-13, 14-17 (protected structures and a national monument) and 18-25 Moore Street, nos 71 and 71a Parnell Street, nos 1-8 O'Rahilly Parade, nos 1-15 Moore Lane, Nos 4-13 (including 3 Moore Lane) and 15-18 Henry Place, nos 6-8 at the junction of Henry Place and Moore Lane and including Clarkes Court off Moore Street, Moore Place off Henry Place, Murphys Court off Moore Lane, part of Moore Lane from the junction of Henry Place and Moore Lane to the junction of Moore Lane and O'Rahilly Parade and part of Henry Place from the junction of Moore Street and Henry Place to the rear of no. 61 O'Connell Street Upper (a protected structure), Dublin 1. The site consists of the majority of a city block bounded by Parnell Street, Moore Lane, O'Rahilly Parade, Moore Street, Henry Street, Henry Place and O'Connell Street Upper, but for the avoidance of doubt excludes nos 70 & 72-75 Parnell St, Nos 37-39 & 62-69 O'Connell St Upper, Nos 31-36 Henry St & Nos 1-3 Henry Place, Dublin 1.</p> <p>Note: permission granted for demolition of 10 Moore Street under Re. Ref 2479/08</p>	Grant Permission on appeal per PL29N.232347: 24/03/2010
2479/08X1	As above – Extension of Duration of Planning Permission granted per PL29N.232347.	Extension of Duration granted: 21/07/2016
3927/09	For a change of use planning permission to existing structures with retail/commercial uses. The proposed planning permission will convert the existing structure to a restaurant/cafe. The development will consist of the refurbishment of no: 10,11 & 12 Moore Street, Dublin 1 into three separate restaurants and part retail stores in No. 10. The gross floor area shall be 359 sqm which will accommodate a cafe/restaurant area with kitchen and storage.	Grant Permission: 05/01/2010
2862/21	<p><i>Description has been abbreviated</i></p> <p>PROTECTED STRUCTURE: Dublin Central GP Limited intends to apply for Permission for a period of 7 years at a site, 'Dublin Central - Site 4', (c. 0.3 Ha) 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. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane), Dublin 1 and otherwise generally bounded by No. 22 Moore Street and No. 13 Moore Lane to the north, Moore Lane to the east, Moore Street to the west and Henry Place to the south. Nos. 14 - 17 Moore Street (National Monument / Protected Structures) is bounded north and south by the proposed development. The proposed development comprises a mixed-use scheme (c. 3,290 sq. m gross floor area) in 2no. parts located north and south of the Nos. 14 - 17 Moore Street (a National Monument / Protected Structures) ranging in height from 1 - 3 storeys including retained independent single storey basements comprising 15no. apartment units (c. 1,454 sq. m gfa), café / restaurant use (c. 864 sq. m gfa), retail use (c. 617 sq. m gfa), cultural</p>	Decision to Grant Permission 12/01/2022; now on appeal to An Bord Pleanála

Planning Ref.	Description	Decision Date
	<p>use (c. 60 sq. m gfa) and office use (c. 295 sq. m gfa). The proposed development to the north of Nos. 14 - 17 Moore Street consists of: - Nos. 20 - 21 Moore Street are refurbished and adapted to provide 1no. café / restaurant / licenced premises with takeaway / collection facility (c. 80 sq. m in total) at ground floor addressing both Moore Street and proposed new public plaza to the rear and 1no. 1-bed apartment and 1no. 2 bed apartment located at 1st and 2nd floor level - 4no. in total (cycle and bin storage at ground floor level). No terraces or balconies are proposed to the residential units; Provision of a new 2 storey extension at the side of No. 17 Moore Street (National Monument / Protected Structure) to act as an extension for ancillary use to the National Monument - a cultural facility (c. 60 sq. m gfa); Provision of an archway between the gable of No. 20 Moore Street and the new 2 storey extension to No. 17 Moore Street (National Monument / Protected Structure) to form an entrance to a new public plaza off Moore Street; Provision of a 2 storey building with profiled roof consisting 1no. licenced restaurant / café unit with takeaway / collection facility (c. 250 sq. m gfa) etc.</p> <p>Note: The proposed development includes the retention of 10 Moore Street with internal and external modifications; as per the decision of the City Council to grant permission, including condition 17. (e) i & iv. The decision is on appeal to An Bord Pleanála.</p>	

Recent Enforcement History:

Recent planning enforcement files: E0457/21.

Description:

This description is based on an internal and external inspection by the Conservation Section on the 5th August 2021, consideration of available research and documentation, together with the architectural heritage documents submitted as part of planning application Reg. Ref: 2862/21.

Exterior

10 Moore Street is an end of terrace, two-bay, three-storey over basement building, dating from c.1750, with 19th and early 20th century interventions, situated on the corner of Moore Street and Henry Place. Modern shop front to ground floor. M-profile roof gabled to Henry Place and hipped to the north, hidden behind granite capped parapet. Large yellow brick chimney stacks to north with rendered chimney stack to rear elevation. Cast-iron hexagonal hoppers with modern downpipe to Henry Place. Machine-made red brick laid in Flemish bond to front elevation with brick specials and red brick quoins to Henry Place corner. Yellow brick laid in English Garden Wall bond to Henry Place gable end, rendered to ground floor. Cement rendered rear and north elevation. Square headed window openings with granite cills and modern casements. Blocked up door opening to Henry Place with segmental headed opening (Fig. 5).

Interior

Basement: No access was afforded to the basement during the site visit (However, the documents submitted with the planning application Reg. Ref. 2862/21 include Appendix A4.3 that provides a photographic inventory of the basement area).

Ground floor: The ground floor is a single unit with modern finishes and support columns to the rear of the retail unit. There is door opening to complex of infill extensions to the rear. The ground floor staircase has been removed and there is temporary ladder access to the first floor.

First floor: 20th century timber floorboards and skirting boards. Modern plaster wall finishes with exposed brickwork in sections and lath and plaster ceiling, front room containing a modern ceiling rose. 20th century timber architraves to front room windows, all window openings blocked up with concrete blocks. Blocked up 18th century corner fireplace in north east corner of front room. Large square headed opening created in the spine wall between the front and rear rooms and internal service room created. Large duct piping cutting through rooms and vented through rear window.

Second Floor: Two rooms to front, a central corridor and one room to rear having 20th century timber floorboards, sections of skirting boards and flat panelled timber doors and architraves. Modern plaster wall finishes with exposed brickwork in sections and lath and plaster ceilings. The rear room has exposed brickwork to the structural party wall with 11 Moore Street (Fig. 8). A rebuilt brickwork area which differs from the surrounding brick coursing is apparent where the access 'creep hole' was created on the evening of the 28th April 1916. This was the first inter-building opening created along the terrace.

Staircase: Removed between ground and first floor. Openwell timber staircase with 20th century square profile balustrades/newel posts and curved handrail with ramped section to half landing.

Historical Background:

The street patterns of Moore Street and Henry Place are visible on Rocque's map of Dublin, with the original house having a return onto Off Lane (Henry Place) with Old Brick Field Lane (Moore Lane) to the rear (Fig. 9).

The terrace has been completely developed by the first edition Ordnance survey map of 1847 with the basement well apparent to 10 Moore Street (Fig. 10). At this stage, there is a return visible onto Henry Place. In the 1830s and early 1840s, 10 Moore Street was in use mostly as an attorney's office. About 1843, a provision dealer opened a shop with tenements overhead. This pattern of occupancy remained the same up to the 1930s.

By the time of the 1891 OS map, the return had been removed (Fig.11). The front basement well appears to have been covered by the pavement and basement steps are apparent in the rear site. Around 1909, the shop keeper T.F. Cogan carried out upgrading works creating a single family dwelling over the shop.

1916 Historical Association

Henry Place, Moore Street and the environs bore witness to the urban conflict of Easter 1916. On the evening of Friday 28th April, a detachment led by the O'Rahilly initially attacked the British army barricade at the northern end of Moore Street by means of a full frontal assault. (Myles, F., page 25).

The next group of men to evacuate were led by Liam Tannman with the intention of identifying a secure place to evacuate the GPO garrison to. *'We rushed across the road into Henry Place and at the end of Henry Place turned the corner left and when we showed up opposite Moore lane we came under fire... We stooped and ran across...The corner house of Moore Street seemed the best place that could be got.. I instructed the men to enter at once and dashed myself to the angle of Henry Place... I shouted at once 'Come on' and the garrison poured out into Henry Place...'* (WS 242)

Other witness statements confirm that the side door of 10 Moore Street was significant in allowing the leadership, including Connolly on a stretcher, and GPO garrison a swift and safe access to a fall-back position with 10 Moore Street serving as the General Headquarters overnight. This has been confirmed by various eye witness accounts namely John Twamley (W.S.629), Charles Saurin (W.S. 288), Seamus Robinson (W.S. 156).

'At the last house of this lane with a frontage in Moore St, Commandant General P.H.Pearse was standing in a gable end doorway.' (Charles Donnelly, W.S. 824)

What followed was the breaking through of party walls with the remaining GPO garrison distributed itself throughout the block as far as today's O'Rahilly Parade. (*Myles, F., page 25*)

'We were using a very large crowbar, and each man would take his turn for a few minutes and then stop to rest...' (Seamus Robinson, W.S. 156) The trace of the subsequent repaired opening is evident in the second floor rear room of 10 Moore Street.

Post 1916

By the 1940's, the upper floors were separate to the retail occupancy at ground and basement. In the 1950's, KC Confectionary carried out works incorporating access into 16 Henry Place and 5a Moore Lane. Since they left in the 1980s, the building has had various retail and commercial uses.

NIAH Record:

The NIAH uses eight categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, technical & social) and identifies five categories of rating in seeking to rank buildings. The NIAH rating values are International, National, Regional, Local and Record Only (I, N, R, L, O). Structures which are considered of International, National, and Regional significance are deemed worthy of inclusion on the RPS.

The National Inventory of Architectural Heritage (NIAH) survey has been carried out for the area under Stage 1 of the Dublin Survey. 10 Moore Street was surveyed, but not recorded.

Assessment of Special Interest under the Planning and Development Act 2000:

The Conservation Section considers the structure at 10 Moore Street, Dublin 1, to be of architectural, historical, social and cultural interest, as follows:

ARCHITECTURAL

The building, though altered and refurbished over the centuries, retains the structural and plan form of the 18th century structure with traces of corner fireplaces and extant original construction material hidden under later interventions. The structure makes a positive contribution to its streetscape setting which affords it architectural interest.

HISTORICAL

This is in addition to the historic fabric having survived through the significant historical events that took place in and around the structure during Easter 1916. The positioning of the side door out of the firing line afforded the GPO garrison swift and relatively safe access to a fall-back position following their evacuation from the burning GPO. The traces of the physical endeavour of breaking through the gable wall of 10 Moore Street is testament to the resilience of this Volunteers. This structure has historical interest as the location of important national events that unfolded there on the evening of 28th April 1916. This is irrespective of the subsequent alterations as the salient historic fabric is still retained and the structure is a poignant memorial to a defining moment in our nation's history.

SOCIAL

The characteristic of special social interest embraces those qualities for which this structure as the first building to be entered in 1916 on the terrace, which now includes the National Monuments of 14-17 Moore St, has become part of the political symbol in creating our national identity.

CULTURAL

The structure's link to the 1916 Rising and the references to it in witness statements from the Volunteers involved, has acquired cultural significance in the intervening century. The *Architectural Heritage Protection Guidelines for Planning Authorities* state that special interest can be assigned to *'...more modest works of the past that have acquired cultural significance with the passing of time.'* (2011, 28). The 1916 Rising was a seminal event in Irish history that has understandably taken on

cultural importance, and this, naturally, includes surviving elements of our architectural heritage that played a role in the events of that week.

Following on from the initial report of the Moore Street Consultative Group, the Moore Street Advisory Group published 'Moore Street Report 2 – Securing History' in July 2019 and 'Moore Street Report Securing History 3' on the 5 May 2021. The latter states that *"No. 10 Moore Street is of particular importance as it was at this location that the rebels entered the terrace to take shelter from the British bullets raining down on Moore Street and Moore Lane"*.

10 Moore Street, Dublin 1, would be considered of 'National' significance, on the basis of the NIAH significance/ratings above.

References:

Myles, F. (2012) Battlefield Archaeological Assessment: Moore Street and Environs.
Molloy & Ass, Assignment of Significance of Certain Upstanding Building Fabric report, Appendix A4.11 as part of the planning submission for 2862/21
Historical Mapping - Ordnance Survey Ireland (osi.ie). Accessed 17/12/21
Moore Street Advisory Group, 'Moore Street Report 2 – Securing History', 31 July 2019 and 'Moore Street Report Securing History 3', 5 May 2021
www.militaryarchives.ie, various witness statements. Accessed 17/12/21

Conclusion:

The Conservation Section concludes that the building comprising 10 Moore Street, Dublin 1, merits inclusion on the Record of Protected Structures on the basis of its architectural, historical, social and cultural significance.

The extent of the proposed Protected Structure status and curtilage is outlined in Fig. 2 of this document (below).

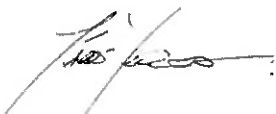
It is now proposed to initiate the statutory process for the proposed addition of this structure to the Record of Protected Structures. This includes undertaking a statutory public consultation process in accordance with Section 55 of the Act. Following the statutory consultation process, a further report will be prepared taking any submissions and observations received into consideration, with a recommendation to the City Council to proceed or not with the proposed addition, or with a recommendation including amendments to the proposed addition.

Recommendation:

It is recommended that the statutory process to initiate the proposed addition of 10 Moore Street, Dublin 1, to the Record of Protected Structures, in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended), be noted.

Recommendation	
Address	Description (to appear on RPS)
10 Moore Street, Dublin 1	Commercial Premises

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.



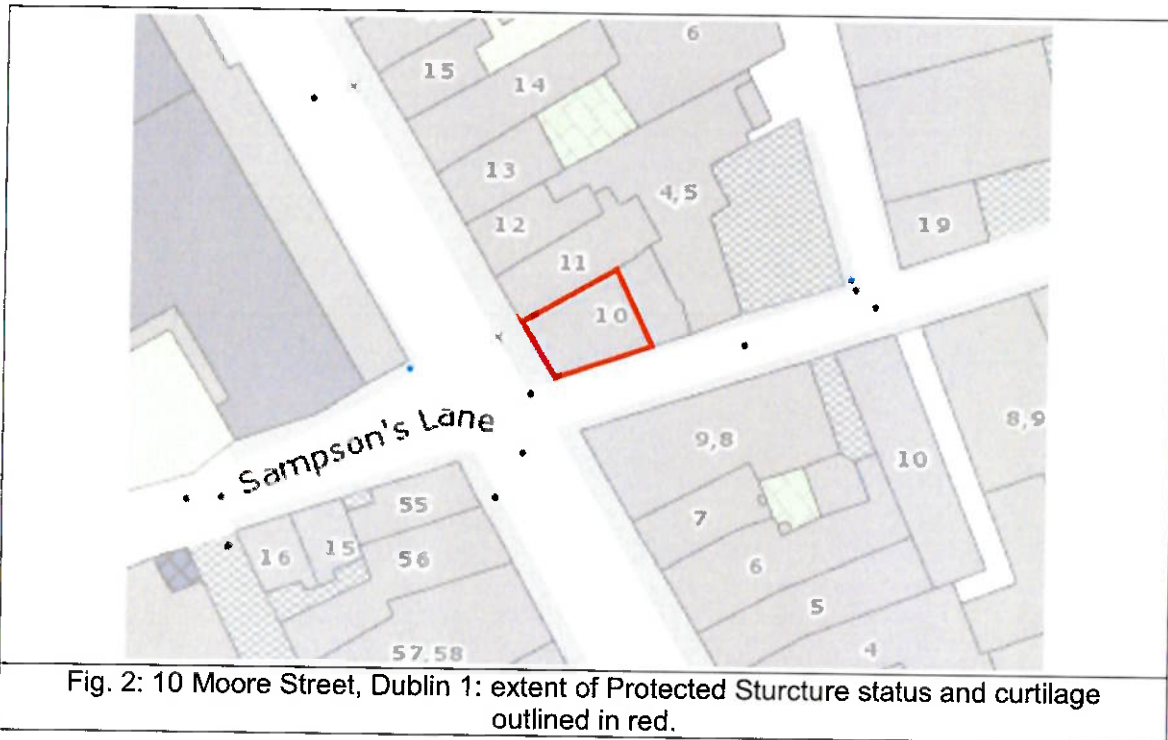
Paraic Fallon
Senior Planner, Conservation Section,
Planning & Property Development Department

29/06/2022

Date

Extent of Protected Structure Status

The extent of protected structure status & curtilage is shown on the map below in red.



Photographs



Fig. 3: Front elevation to Moore Street and side elevation to Henry Place



Fig. 4: Rear rendered elevation



Fig. 5: Blocked up side door to Henry Place.



Fig. 6: Staircase viewed from first floor



Fig. 7: Second Floor front room with timber floor boards and blocked up window opening



Fig. 8: Second Floor rear room of No. 10 with repaired brick work in the party wall to No. 11 as evidence of a 'creep hole' made during 1916

Historic Maps



Fig. 9: Rocque's map of Dublin 1756



Fig. 10: Dublin OS sheet 14, 1847



Fig. 11: Dublin OS sheet XVIII.47, 1891



Fig. 12: Dublin OS 25" map, c. 1915

Conservation Section, Planning & Property Development Department
Civic Offices, Wood Quay, Dublin 8

An Rannóg Caomhantais, An Roinn Pleanála agus Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Email: conservation@dublincity.ie T. 01 222 3927

29 June 2022 (updated from previous report of 15 March 2022)

To the Chairperson and Members of the Central Area Committee

Initiation of the Statutory Process for the Proposed Addition of 20/21 Moore Street, Dublin 1, to the Record of Protected Structures in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended).

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

Photograph of Structure



Requests and Reasons for Addition:

- The Elected Members of Dublin City Council at the monthly council meeting held on 8th June 2015, passed a motion put forward by Councillor John Lyons (Motion 44): *“That the following 1916 Buildings (Add 569), identified in the Franc Myles Battlefield Report, commissioned by Shaffrey Associates on behalf of Chartered Land, be added to the list of protected structures as buildings of National historical importance. 1 .O’ Briens Mineral Water Building, Henry Place - Occupied by volunteers. 2 .The White House, Henry Place - Occupied and held by Michael Collins. 3. No.10 Moore Street - Point of entry -The First Council of War - Overnight*

stay. 4. The Bottling Stores rear. 10 Moore Street and Moore Lane - Occupied by Frank Henderson. 5. Hanlons, 20/21 Moore Street - Surrender order accepted by volunteers after consultation with Thomas Clarke, Joseph Plunkett, Michael Collins and Sean Mac Diarmada”.

- Donna Cooney on 9 December 2015 as part of Draft Dublin Development Plan 2016-22 (Submission 2564). ‘I would recommend the listing of all the houses on Moore Street from No.10 through to the last house on the terrace to keep the character of the street scape at the site of the National Monument 14-17 Moore Street’ (Add700).
- Patrick Cooney: for architectural and historical reasons (Add296): *Architectural*: 19th century red brick over 20th century shop-front. Possible 18th century elements. *Historical*: Believed to be part of the Moore Street HQ Block. It is also believed that MacDiarmada, Clarke and Collins were here with the London Irish Kimmage Garrison. The backyard is where surrender was finally accepted by the garrison members.

The structures referred to in the first bullet point above have been assessed individually with a separate report for each. 20/21 Moore Street, Dublin 1, forms the subject of this report.

Location and Land Use Zoning:

20/21 Moore Street is located in an area zoned Z5, the objective of which is: “To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity”.



Figure 1: Site Location and Zoning Map

Architectural Conservation Area:

The buildings at 20/21 Moore Street are not within an Architectural Conservation Area, but are proximate to the designated O'Connell Street ACA (2001); shown in diagonal green coloured cross hatch on Figure 1, above.

Relevant Planning History:

Planning Ref	Description of Development	Decision
2432/95	Rear of 20-21 Moore Street, Dublin 1. Alterations, extensions and improvements to fish processing and chill store areas.	Grant Permission: 08/02/1996
1355/98	The Project includes two floors of car-parking below basement level (capacity 720 cars); four floors of mixed Retail and Leisure uses	Grant Permission: 23/10/1998

Planning Ref	Description of Development	Decision
	(approx. 40,000 sq.m. gross floor area) and comprising of Department Stores, retail units, restaurants, bars, family entertainment centre and tourist information. Also, on the upper level there are 15 multi- purpose auditoriums for cinema, conference and theatre uses. There is also a 61 bedroom hotel with associated function rooms at 46/49 Upper O'Connell Street which is presently occupied by Fingal County Council. The proposal involves building under, on and over part of Moore Lane. The listed facades of Nos. 57, 58 and Nos.52/54 Upper O'Connell Street are being retained as part of the development.	
2479/08	<p>Description has been abbreviated</p> <p>7 year permission for development at an overall site of c 2.17 hectares, at nos 40-41, 42 (a protected structure), 43 (a protected structure), 44 (a protected structure), 45-51, 52-54 (protected structures), 55-56, 57 (a protected structure), 58 (a protected structure), 59, 60 (a protected structure) and 61 (a protected structure) and 60a (otherwise 5 Henry Place) O'Connell Street Upper, Nos 37-41a Henry Street, nos 1-13, 14-17 (protected structures and a national monument) and 18-25 Moore Street, nos 71 and 71a Parnell Street, nos 1-8 O'Rahilly Parade, nos 1-15 Moore Lane, Nos 4-13 (including 3 Moore Lane) and 15-18 Henry Place, nos 6-8 at the junction of Henry Place and Moore Lane and including Clarkes Court off Moore Street, Moore Place off Henry Place, Murphys Court off Moore Lane, part of Moore Lane from the junction of Henry Place and Moore Lane to the junction of Moore Lane and O'Rahilly Parade and part of Henry Place from the junction of Moore Street and Henry Place to the rear of no. 61 O'Connell Street Upper (a protected structure), Dublin 1. The site consists of the majority of a city block bounded by Parnell Street, Moore Lane, O'Rahilly Parade, Moore Street, Henry Street, Henry Place and O'Connell Street Upper, but for the avoidance of doubt excludes nos 70 & 72-75 Parnell St, Nos 37-39 & 62-69 O'Connell St Upper, Nos 31-36 Henry St & Nos 1-3 Henry Place, Dublin 1.</p> <p>Note: permission granted for demolition of 20/21 Moore Street under Reg. Ref: 2479/08.</p>	Grant Permission on appeal per PL29N.232347: 24/03/2010
2479/08X1	As above – Extension of Duration of Planning Permission granted per PL29N.232347.	Extension of Duration granted: 21/07/2016
3951/17	Change of use for part of previously approved retail unit from retail to retail and off-licence sales area.	Grant Permission: 07/02/2018
2862/21	<p>Description has been abbreviated</p> <p>PROTECTED STRUCTURE: Dublin Central GP Limited intends to apply for Permission for a period of 7 years at a site, 'Dublin Central - Site 4', (c. 0.3 Ha) 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. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane), Dublin 1 and otherwise generally bounded by No. 22 Moore Street and No. 13 Moore Lane to the north, Moore Lane to the east, Moore Street to the west and Henry Place to the south. Nos. 14 - 17 Moore Street (National Monument / Protected Structures) is bounded north and south by the proposed development. The proposed development comprises a mixed-use scheme (c. 3,290 sq. m gross floor area) in 2no. parts located north and south of the Nos. 14 - 17 Moore Street</p>	Decision to Grant Permission 12/01/2022; now on appeal to An Bord Pleanála

Planning Ref	Description of Development	Decision
	<p>(a National Monument / Protected Structures) ranging in height from 1 - 3 storeys including retained independent single storey basements comprising 15no. apartment units (c. 1,454 sq. m gfa), café / restaurant use (c. 864 sq. m gfa), retail use (c. 617 sq. m gfa), cultural use (c. 60 sq. m gfa) and office use (c. 295 sq. m gfa). The proposed development to the north of Nos. 14 - 17 Moore Street consists of: - Nos. 20 - 21 Moore Street are refurbished and adapted to provide 1no. café / restaurant / licenced premises with takeaway / collection facility (c. 80 sq. m in total) at ground floor addressing both Moore Street and proposed new public plaza to the rear and 1no. 1-bed apartment and 1no. 2 bed apartment located at 1st and 2nd floor level - 4no. in total (cycle and bin storage at ground floor level). No terraces or balconies are proposed to the residential units; Provision of a new 2 storey extension at the side of No. 17 Moore Street (National Monument / Protected Structure) to act as an extension for ancillary use to the National Monument - a cultural facility (c. 60 sq. m gfa); Provision of an archway between the gable of No. 20 Moore Street and the new 2 storey extension to No. 17 Moore Street (National Monument / Protected Structure) to form an entrance to a new public plaza off Moore Street; Provision of a 2 storey building with profiled roof consisting 1no. licenced restaurant / café unit with takeaway / collection facility (c. 250 sq. m gfa) etc.</p> <p>Note: The proposed development includes the retention of 20/21 Moore Street, with internal and external modifications; as per the decision of the City Council to grant permission, including condition 17. (a-d) & (e) i & vi. The decision is on appeal to An Bord Pleanála.</p>	

Recent Enforcement History:

E0820/21: 20-21 Moore Street, D1, re: internal and external works.

Description:

This description is based on an internal and external inspection by the Conservation Section on the 5th August 2021, consideration of research and documentation available, together with the architectural heritage documents submitted as part of planning application Reg. Ref: 2861/21.

Exterior

20/21 Moore Street comprises a pair of former two-bay, three-storey terraced buildings, originally constructed in the mid to late 18th century. Currently occupied to ground floor with vacant upper floors (Figs. 3, 5 and 6).

The buildings now comprise a four-bay, three-storey over potential basement terraced commercial building. Early roof form to both structures running perpendicular to street with hipped sections to front and rear. Red brick chimneystack to south to No. 21 and rendered chimneystack to No. 20. Granite coping to parapet over rendered eaves course with raised rendered panels. Front façade was refaced in the late 19th/early 20th century and is comprised of red brick laid in Flemish bond with later cementitious weather struck pointing. Square-headed window openings. Later enlarged window opening to first floor of No. 20 with blocked up/blind windows to second floor. Two over-two timber sash windows to No. 21, dating to circa 1900. Granite sills to window openings. Modern shopfront to ground floor. Cast-iron rainwater goods.

Rear elevation comprises buff brick laid in English garden wall bond. Brick parapet to No. 20. Cast-aluminium rainwater good to No. 21. Square-headed window openings with two-over-two timber sash windows, granite sills and cast-iron security bars.

Later industrial buildings to rear site (No. 12 Moore Lane) comprising three-storey industrial building with a corrugated pitched roof and concrete rendered walls. Single modern timber door to Moore Lane.

Interior

Molloy and Associates state that the *shell of No. 21 is early 18th century, retaining some corner chimneybreasts and party walls made of early handmade brick. No. 20 is slightly later in origin. The structure to the rear at No. 12 Moore Lane dates from the 1960's, comprises a two-storey concrete framed structure.... Access to the upper floors of Nos. 20 and 21 is provided across the roof of this structure* (Molloy & Associates, Feb 2021, 9). This description was confirmed by the Conservation Section during its site inspection on the 5th of August 2021.

The ground floor comprises a large modern retail space. Surviving 18th century features were identified to the upper floors of number 21 including corner fireplaces and a dog leg, open string staircase with continuous handrail (Fig. 5). Some historic timber sash windows survive to both 20 and 21 Moore Street.

Historical Background:

Moore Street was laid out in the early 18th century as part of the Drogheda Estate. *'The Moores (Earls of Drogheda) and in particular - the third Earl of Drogheda developed the first major east west route in the new north city, Henry Street, which was complemented by Drogheda Street which ran on a north-south axis immediately to the east. Moore Street was laid out parallel to Drogheda Street, these two streets both ran into Great Britain Street to the north, an old route to Malahide and Howth'* (O'Connell Street ACA, 2001, 9).

Nos. 20/21 Moore Street do not appear on Rocque's 1756 Map but do on his 1773 map: *An Accurate Survey of the City and Suburbs of Dublin by Mr John Rocque with Additions and Improvements by Mr. Bernard Scale* (Fig. 8). The street is shown as developed with No. 20 and 21 in place. No. 20 displays a closet return typical of the 18th century while No. 21 has none. Stable structures are shown to the rear of No. 20 delimited by the black hatched buildings to the rear.

The buildings at 20 and 21 Moore Street were occupied as separate retail units until the beginning of the 20th century. No 20 became a fishmongers shop run by the Hanlon family in the late 1870s and in about 1903 the family acquired the adjacent building at no 21 (Molloy & Associates 2021, 2).

Despite a history of alterations, No. 20/21 Moore Street still retains evidence of an 18th century roof form reflecting the street's 18th century origins (Fig. 7). No. 21 retains corner fireplaces to upper floors (Fig. 5) and an early staircase (Fig. 6).

Situated in the commercial heart of Dublin, Moore Street has always been a vibrant trading street and this continues today. In the late 19th century/early 20th century Moore Street was densely occupied with small shops and stalls in contrast with the grander establishments on Sackville Street and Henry Street (Shaffrey Associates, 2005, 3). Thoms Directory in 1916 lists 20/21 Moore Street as being occupied by Hanlon, M. and P. Fishmongers and ice merchants.

1916 Historical Association

Following the Easter Rising in 1916, the street, due to its proximity to the GPO, was occupied by retreating rebel forces and bore witness to the urban conflict of Easter 1916. Moore Street, Henry Place and Moore Lane were key thoroughfares associated with the 1916 Rising featuring significantly in witness statements and other contemporary documentation. All of the buildings in situ in the terrace at 10-25 Moore Street were occupied by the rebel forces on the night and morning of the 28th and 29th of April 1916. No. 16 Moore Street, was the last headquarters of the Provisional Government, where the decision to surrender was made.

A number of the combatants had vivid memories of spending the night in O'Hanlon's fish shop in particular (Nos. 20-21) (*ibid.* 10). These memories were recorded by the 'Bureau of Military History Witness Statements'. Statements for Nos. 20-21, O'Hanlon's Fishmongers include Eamonn (Ned) Bulfin II, Feargus de Burca III, Seán McLoughlin, Liam Tannam and Oscar Traynor (Shaffrey's 2005). See below for detailed accounts.

- *Eamonn Bulfin: II "The walls were quite thin, and there was no bother breaking them. We reached as far as Price's [22 & 23], or O'Hanlon's [20-21] which was a fish shop. I remember the smells there. We spent Friday night barricading all the houses that we occupied by throwing down all the furniture from the rooms - clearing all the rooms - down the stairways into the bottom halls, blocking up the doorways".*
- *Liam Tannam: VII "When we got as far as Hanlon's Fish Shop I saw a number of our wounded lying about. They were quite cheerful although in some cases they were wounded through the lungs. There was one British soldier there, shot through the thigh, and he was moaning and groaning".*
- *Oscar Traynor: IV "Some time around this period I was sent for and asked to report to Commandant Pearse in Hanlon's fish shop in Moore St.; this was one of the buildings through which we had passed on our way up the street...It was from this building that Pearse eventually left to arrange the surrender. This was some time early on Saturday morning".*

References to breaking through the walls of buildings along Moore Street during the evacuation feature heavily in many of the witness statements. According to Joe Good, the idea came from one of the young women sheltering in Cogan's (Good, 57). The technique of burrowing through walls had already been utilised by Republican detachments to the rear of the GPO and in positions on the far side of Sackville Street and had been recommended as a tactic by Connolly. Progress through the brick walls, in many cases a single stretcher thick, would have been rapid, although it appears only a single large crowbar was available (with one reference to there being a pick used in addition) (Shaffrey & Myles 2012, 54).

Opening up works and investigations carried out in 2012 by Franc Myles and Shaffrey Associates at 20/21 Moore Street did not reveal any evidence of blocked up openings. The report does state however that either the connections between the buildings already existed in 1916 thus making movement between the two building easy or an opening was made where one of the door openings is now positioned (2012, 14). This view is supported by the research carried out on the buildings by Dooley and Hall and Molloy Associates. Dooley and Hall state that Nos. 20 and 21 have operated as a single unit with interconnectivity between them since the turn of the 20th century, and in 1916 there was no need for the Irish Volunteers to tunnel between the two (Dooley & Hall, 2019, 19).

References:

- Casey, C. (2005) *The Buildings of Ireland, Dublin*. Yale University Press.
- Dooley, Terence & Hall, Donal Report (2019) Historical survey of the provenance of 10-25 Moore Street, Dublin c. 1901-1970. Report carried out for the Moore Street Advisory Group. <https://www.gov.ie/pdf/?file=https://assets.gov.ie/86217/815e932a-af22-434f-861a-086ecd1bd673.pdf#page=null>
- DHLGH (2011). *Architectural Heritage Protection Guidelines for Planning Authorities*. Published by the Stationary Office, Dublin. <https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>
- Dublin City Council (2001). *O'Connell Street Architectural Conservation Area*. Report by Dublin City Council.
- Molloy & Associates Conservation Architects (February 2021). *Dublin Central Masterplan Area Conservation Plan*. Report submitted with Planning Reference 2862/21.
- Shaffrey Associates & Montague, J. (Nov 2005) *Architectural & Historical Assessment, No. 16 Moore Street, Dublin 1*. Unpublished Report for Dublin City Council.
- Shaffrey Associates Architects & Franc Myles, Archaeology & Built Heritage (06 February 2012). *Application for Ministerial Consent to carry out Works at 14 – 17 Moore Street, Dublin 1, a National Monument*. Unpublished Report submitted to Department of Arts, Heritage and Gaeltacht in response to a Request for Additional Information; incl. the Battlefield Archaeological Assessment for Moore Street & Environs by Franc Myles.

NIAH Significance/Rating:

The NIAH uses eight categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, technical & social) and identifies five categories of rating in seeking to rank buildings. The NIAH rating values are International, National, Regional, Local and Record Only (I, N, R, L, O). Structures which are considered of International, National, and Regional significance are deemed worthy of inclusion on the RPS.

The National Inventory of Architectural Heritage (NIAH) survey has been carried out for the area under Stage 1 of the Dublin Survey. 20/21 Moore Street was surveyed, but not recorded.

Assessment of Special Interest under the Planning and Development Act 2000:

The Conservation Section considers 20/21 Moore Street, Dublin 1, to be of architectural, historical, cultural and social interest, as follows:

ARCHITECTURAL:

Number 20-21 is part of a terrace of multi-period buildings on the eastern side of Moore Street. Externally it presents as a modest commercial building, however, it was re-faced in the late 19th/early 20th, which disguises earlier 18th century buildings. Despite a history of alterations it still retains evidence of an 18th century roof form reflecting the street's 18th century origins. No. 21 retains corner fireplaces to upper floors and an early staircase. As an early surviving house in an area largely lost during the Rising, this example is of particular importance. Furthermore, the buildings are considered to contribute positively to the setting of the National Monument at No. 14-17 Moore Street.

HISTORICAL

The buildings were occupied by retreating rebel forces in 1916. No. 20/21 Moore Street formed part of the Moore Street HQ Block (10-25 Moore Street) which was occupied by the retreating rebel forces on the night and morning of the 28th and 29th of April 1916. It is considered to be of significant historic interest due to its association with the final days of the Easter Rising and is referred to a number of times in the accounts of the former combatants who remember spending the night there.

CULTURAL

The structure's link to the 1916 Rising and the references to it in witness statements from the Volunteers involved, has acquired cultural significance in the intervening century. The *Architectural Heritage Protection Guidelines for Planning Authorities* state that special interest can be assigned to '...more modest works of the past that have acquired cultural significance with the passing of time.' (2011, 28). The 1916 Rising was a seminal event in Irish history that has understandably taken on cultural importance, and this, naturally, includes surviving elements of our architectural heritage that played a role in the events of that week.

SOCIAL

20/21 Moore Street is considered to be of social significance owing to its association with the Easter Rising evacuation route and the Moore Street HQ block. The building has significant interest as it was one of the last lines of refuge of the Irish Volunteers. The *Architectural Heritage Protection Guidelines for Planning Authorities* state that the characteristic of special social interest embraces those qualities for which a structure, a complex or an area has become a focus of ... political, symbolic or other sentiment to any group of people. A community may have an attachment to a place because it is an essential reference point for that community's identity, whether as a meeting place or a place of tradition, ritual or ceremony... This category of special interest may sometimes not be directly related to the physical fabric of a particular structure or structures and may survive physical alteration (2011, 30). The 1916 Easter Rising was a defining moment in Ireland's struggle for independence.

20/21 Moore Street, Dublin 1, would be considered of 'National' significance, on the basis of the NIAH significance/ratings above.

Conclusion:

The Conservation Section concludes that the structures comprising 20/21 Moore Street, Dublin 1, merit inclusion on the Record of Protected Structures.

The extent of the proposed Protected Structure status and curtilage is outlined in Fig. 2 of this document (below).

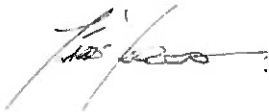
It is now proposed to initiate the statutory process for the proposed addition of this structure to the Record of Protected Structures. This includes undertaking a statutory public consultation process in accordance with Section 55 of the Act. Following the statutory consultation process, a further report will be prepared taking any submissions and observations received into consideration, with a recommendation to the City Council to proceed or not with the proposed addition, or with a recommendation including amendments to the proposed addition.

Recommendation:

It is recommended that the statutory process to initiate the proposed addition of 20/21 Moore Street, Dublin 1, to the Record of Protected Structures, in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended), be noted.

Recommendation	
Address	Description (to appear on RPS)
20/21 Moore Street, Dublin 1	Commercial Premises

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.



Paraic Fallon
Senior Planner, Conservation Section
Planning & Property Development Department

29/06/2022

Date

Extent of Protected Structure Status

The extent of protected structure status & curtilage is shown on the map below in red.



Photographs



Figure 3: Front elevation



Figure 4: Rear of 20 Moore Street

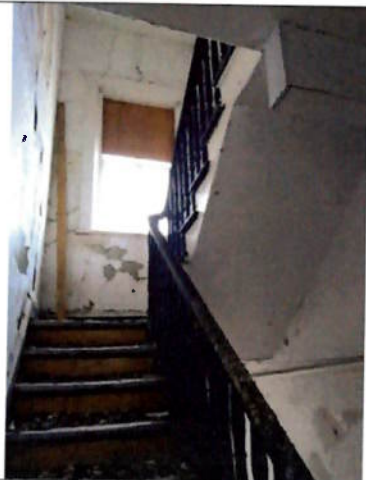


Figure 5: Surviving dogleg, open string staircase with continuous handrail.



Figure 6: Corner fireplace

Aerial Image



Fig. 7: 20/21 Moore Street showing early roof form perpendicular to street with hipped sections to front and rear (Google Earth 04/12/20)
Historic Map

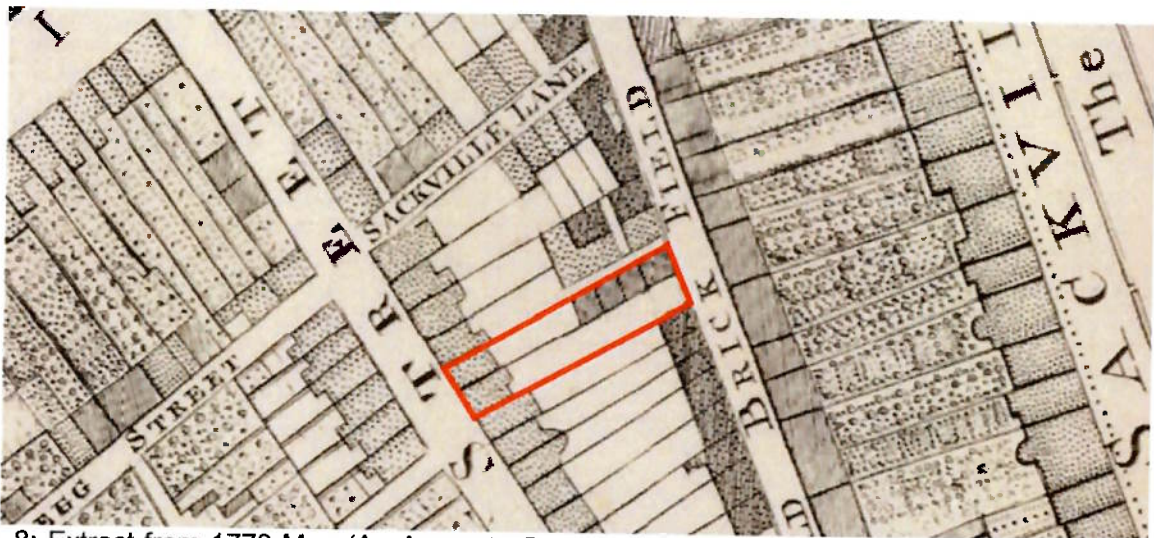


Fig. 8: Extract from 1773 Map 'An Accurate Survey of the City and Suburbs of Dublin by Mr John Rocque with Additions and Improvements by Mr. Bernard Scale'. Nos. 20/21 Moore Street don't appear on Rocque's 1756 Map but do on this 1773 map. The street is shown as developed with No. 20 and 21 in place. No. 20 displays a closet return typical of the 18th century while No. 21 has none. Stable structures are shown to the rear of No. 20 delimited by the black hatched buildings to the rear.

Conservation Section, Planning & Property Development Department
Civic Offices, Wood Quay, Dublin 8

An Rannóg Caomhantais, An Roinn Pleanála agus Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Email: conservation@dublincity.ie T. 01 222 3927

29 June 2022 (updated from previous report dated 21 March 2022)

To the Chairperson and Members of the Central Area Committee

Initiation of the Statutory Process for the Proposed Addition of the two-storey historic brick party wall (only) on the north side of 12 Moore Street, Dublin 1, to the Record of Protected Structures in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended).

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

Photograph of Structure



Request and Reason for Addition:

- The Elected Members of Dublin City Council at the monthly council meeting held on 14th June 2021, passed a motion (Emergency Motion No. 1) put forward by Councillors Micheál Mac Donncha, Máire Devine, Janice Boylan, John Lyons, Cieran Perry, Christy Burke, Daithí Doolan, Seamus McGrattan, Larry O'Toole, Daniel Céitinn, Anthony Connaghan; *"That this City Council, in relation to the Hammerson application for the development of the Dublin Central site that includes the demolition of 1916 buildings, structures and fabric on Moore*

Street, calls for the completion of the stalled process to add five buildings on the site to the record of protected structures as agreed by this council; we further call for the terrace 10-25 Moore Street to be added to the record of protected structures as a matter of urgency so that a full assessment of all 1916 buildings, carried out by suitably qualified independent experts, can be made available."

Nos. 14-17 Moore Street inclusive are a National Monument and each of the four buildings is a Protected Structure; RPS Ref. Nos. 5282, 5283, 5284 and 5285, respectively.

An RPS assessment report has been completed for 10 Moore Street and 20/21 Moore Street, with recommendations in both instances for the proposed addition of the buildings to the City Council's Record of Protected Structures.

The remaining buildings in this terrace, i.e. Nos. 11, 12, 13, 18, 19, 22, 23, 24 and 25 Moore Street, referred to above, have now been assessed individually with a separate report for each. 12 Moore Street, Dublin 1, forms the subject of this report.

Location and Land Use Zoning:

The subject structure is located in an area zoned Z5, the objective of which is "To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity".

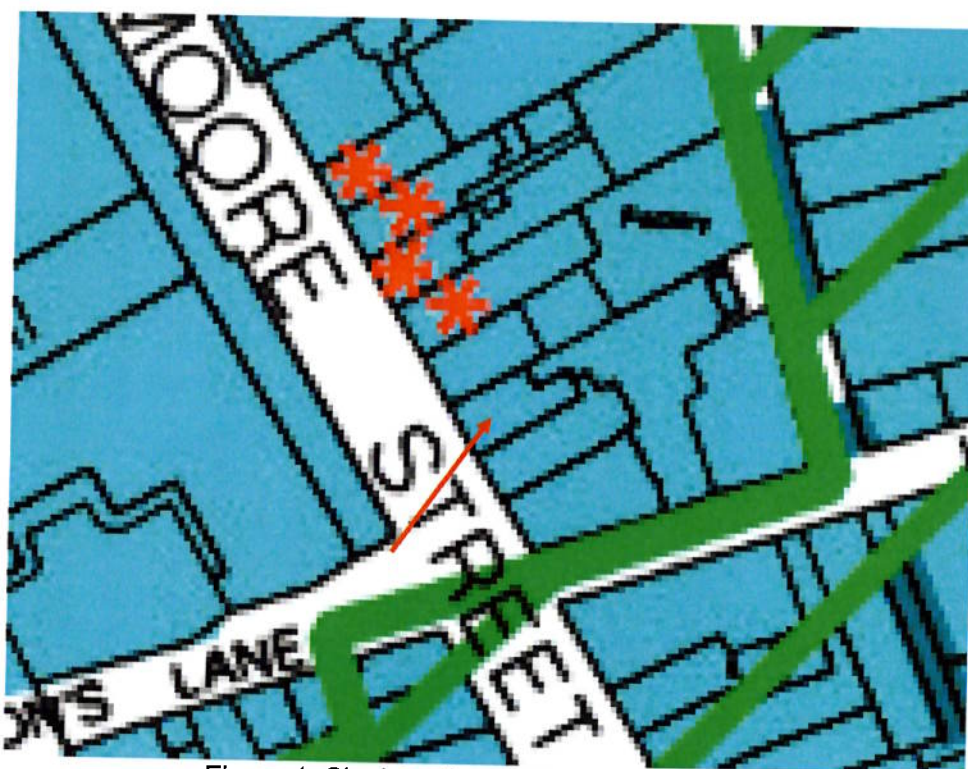


Figure 1: Site Location and Land Use Zoning

Architectural Conservation Area:

12 Moore Street is not within an Architectural Conservation Area, but are proximate to the designated O'Connell Street ACA (2001); shown in diagonal green coloured cross hatch on Fig. 1, above.

Relevant Planning History:

Planning Ref.	Description	Decision Date
2579/75	Reconstruction of Bakery Shop & Offices	Grant Permission 12/11/1975

Planning Ref.	Description	Decision Date
2479/08	<p>Description has been abbreviated</p> <p>7 year permission for development at an overall site of c 2.17 hectares, at nos 40-41, 42 (a protected structure), 43 (a protected structure), 44 (a protected structure), 45-51, 52-54 (protected structures), 55-56, 57 (a protected structure), 58 (a protected structure), 59, 60 (a protected structure) and 61 (a protected structure) and 60a (otherwise 5 Henry Place) O'Connell Street Upper, Nos 37-41a Henry Street, nos 1-13, 14-17 (protected structures and a national monument) and 18-25 Moore Street, nos 71 and 71a Parnell Street, nos 1-8 O'Rahilly Parade, nos 1-15 Moore Lane, Nos 4-13 (including 3 Moore Lane) and 15-18 Henry Place, nos 6-8 at the junction of Henry Place and Moore Lane and including Clarkes Court off Moore Street, Moore Place off Henry Place, Murphys Court off Moore Lane, part of Moore Lane from the junction of Henry Place and Moore Lane to the junction of Moore Lane and O'Rahilly Parade and part of Henry Place from the junction of Moore Street and Henry Place to the rear of no. 61 O'Connell Street Upper (a protected structure), Dublin 1. The site consists of the majority of a city block bounded by Parnell Street, Moore Lane, O'Rahilly Parade, Moore Street, Henry Street, Henry Place and O'Connell Street Upper, but for the avoidance of doubt excludes nos 70 & 72-75 Parnell St, Nos 37-39 & 62-69 O'Connell St Upper, Nos 31-36 Henry St & Nos 1-3 Henry Place, Dublin 1.</p> <p>The proposed development has a gross floor area (GFA) of 158,026sqm; including 109 no. retail units and an anchor store, 110 no. retail units in total (c 56,155sqm); 17 no. cafe/restaurant/bar units (c 5,372sqm); 108 no. residential units; office space (c. 2,893sqm); a gallery (c. 903sqm); a visitor attraction or 'Sky Lift', viewing deck and ticketing area (c. 435sqm); a drop in facility (c. 157sqm); a commemorative centre (c. 268sqm), an assembly hall (c. 320sqm); 2no. new public streets, 3 no. public spaces at street level, a roof garden (c1258sqm); an outdoor performance space (c263sqm); communal residential open space, (c2554sqm); 1115 no. car parking spaces, 560 no. bicycle parking spaces, a c30m high 'green wall' or hydroponic vertical garden with feature lift on the Henry Street frontage, and ancillary uses, with a minimum height above ground of 3 no. storeys, a maximum height of 13 no. storeys and 5 no. basement levels.</p> <p>Note: permission granted for demolition of 12 Moore Street under Reg. Ref: 2479/08.</p>	Grant Permission on appeal per PL29N.232347: 24/03/2010
2479/08X1	As above – Extension of Duration of Planning Permission granted per PL29N.232347.	Extension of Duration granted: 21/07/2016
2862/21	<p>PROTECTED STRUCTURE: Dublin Central GP Limited intends to apply for Permission for a period of 7 years at a site, 'Dublin Central - Site 4', (c. 0.3 Ha) 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. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane), Dublin 1 and otherwise generally bounded by No. 22 Moore Street and No. 13 Moore Lane to the north, Moore Lane to the east, Moore Street to the west and Henry Place to the south. Nos. 14 - 17 Moore Street (National Monument / Protected Structures) is bounded north and south by the proposed development. The proposed development comprises a mixed-use scheme (c. 3,290 sq. m gross floor area) in 2no. parts located north and south of the Nos. 14 - 17 Moore Street (a National Monument / Protected Structures) ranging in height from 1 - 3 storeys including retained independent single storey</p>	Decision to Grant Permission 12/01/2022; now on appeal to An Bord Pleanála

Planning Ref.	Description	Decision Date
	<p>basements comprising 15no. apartment units (c. 1,454 sq. m gfa), café / restaurant use (c. 864 sq. m gfa), retail use (c. 617 sq. m gfa), cultural use (c. 60 sq. m gfa) and office use (c. 295 sq. m gfa). The proposed development to the north of Nos. 14 - 17 Moore Street consists of: - Nos. 20 - 21 Moore Street are refurbished and adapted to provide 1no. café / restaurant / licenced premises with takeaway / collection facility (c. 80 sq. m in total) at ground floor addressing both Moore Street and proposed new public plaza to the rear and 1no. 1-bed apartment and 1no. 2 bed apartment located at 1st and 2nd floor level - 4no. in total (cycle and bin storage at ground floor level). No terraces or balconies are proposed to the residential units; Provision of a new 2 storey extension at the side of No. 17 Moore Street (National Monument / Protected Structure) to act as an extension for ancillary use to the National Monument - a cultural facility (c. 60 sq. m gfa); Provision of an archway between the gable of No. 20 Moore Street and the new 2 storey extension to No. 17 Moore Street (National Monument / Protected Structure) to form an entrance to a new public plaza off Moore Street; Provision of a 2 storey building with profiled roof consisting 1no. licenced restaurant / café unit with takeaway / collection facility (c. 250 sq. m gfa) etc.</p> <p>Note: The proposed development consists of the demolition of No. 12 Moore Street, with the retention of the historic party wall between Nos. 12 and 13 Moore Street; now the subject of an appeal to An Bord Pleanála.</p>	

Recent Enforcement History:

E0762/05; F0013/10; E0866/11

Description:

12 Moore Street was inspected by the Conservation Section on the 19 July 2021 as part of the architectural heritage assessment of the proposed development per Reg. Ref. 2862/21.

This description is based on that internal and external inspection, along with consideration of available research and documentation, the architectural heritage documents submitted as part of planning application Reg. Ref: 2862/21, and a more recent external inspection in March.

Exterior:

Terraced two-bay, three-storey over basement premises, built c.1975, with a two-storey extension to rear encompassing No.5a Moore Lane. Projection above two-storey extension houses stair core. The premises replaced an earlier structure on the plot fronting onto Moore Street. Flat roof. Red brick laid in stretcher bond to front façade with concrete copings. Rear and side walls above extension are cement-rendered. The remains of an historic brick party wall standing two-storeys in height with concrete above can be seen between No. 12 and No.13 to the north, sandwiched between the two more recent party walls. Square-headed window openings with red brick jack arches, concrete sills and aluminium windows. The window openings have been blocked internally using concrete blocks. Late twentieth-century shopfront to ground floor. A red brick nib of the historic party wall between No.12 and No.13 is visible to the north end of the front façade, two storeys in height with concrete infill to bring the nib to three storeys.

Interior:

The ground floor accessed directly from Moore Street is a single unit, operating as a shop with modern finishes and no historic fabric in evidence. A door to the rear (east) of the space, leads through to a space linked with No.11. Finishes are modern and there is no evidence of historic fabric.

The first floor of No.12 is interlinked with No. 11 Moore Street, 15-16 Henry Place and 5a Moore Lane. Finishes to the first floor are all modern with no historic fabric in evidence.

The second floor of No.12 is accessed by way of stair core projection to the north east of the building. All finishes to the second floor are modern and there is no evidence of historic fabric.

Historical Background

A structure was first indicated on the plot of No.12 Moore Street on Bernard Scalé's 1773 revision of John Rocque's *An Accurate Survey of the City and Suburbs of Dublin* (1756), as part of a terrace of buildings. The plots on Moore Street stretched back to what is now Moore Lane, then called Old Brick Field Lane. A structure continues to be shown on the site on historic mapping throughout the nineteenth-century and into the twentieth century. The structure had a commercial use from an early date. The building was used variously by a tailor, an upholstery, a provision dealer, pharmacy, bakery, china shop and dairy. The 1893 Goad's Fire Insurance Map annotates the building as having a shop at ground floor level with tenements over. It is a slate-roofed three-storey structure with a single-storey return to rear (Fig. 8). A single-storey timber structure is shown across the plot to the rear with a yard opened to Moore Lane. The 1901 Census records the building as a 'Shop and Tenement', occupied by six families.

At the time of the 1911 Census, the building was described as a shop and occupied by three households, indicating that the building also included tenements. Thom's Directory records T.F. Cogan, a confectionary, as occupying No. 12. Cogan's also occupied 10 Moore Street at this time.

1916 Historical Association

On Friday 28th April 1916, the Volunteers garrison in the GPO commenced evacuation of the building as it became engulfed in fire. Following an initial attempt by a group led by 'The O'Rahilly' to reach the William & Woods factory on Great Britain Street (now Parnell Street) that failed, the remainder of the garrison exited the GPO by a side entrance on Henry Street directly opposite the southern end of Henry Place. They made their way along Henry Place before breaking into No.10 Moore Street, located at the junction of Moore Street and the western end of Henry Place. From there, they broke openings through upper floor party walls in buildings along Moore Street during the night of April 28th.

Joe Good, in his account of the 1916 Rising, *Inside the GPO 1916: A First-hand Account*, recounted that the idea for breaking through walls came from one of the young women sheltering in 10 Moore Street (Cogan's). (1996, 57) Republican detachments to the rear of the GPO had utilised the technique of burrowing through walls and in positions to the far side of Sackville Street. James Connolly had also recommended it as a tactic. The walls were, in many cases, a single stretcher (brick) thick and progress through them would have been rapid; though witness statements refer to there being only a single crowbar available. 'Creep holes' have been recorded in party walls with pre-1916 fabric surviving, mostly at first floor level, though there are creep holes at other levels between some buildings. Feargus de Burca in his witness statement recollected the following: '*Creeping through holes into bedrooms, then downstairs and through another opening into sitting-rooms, through shops and finally to our resting place for the night...*' (WS 694)

It is unknown where any creep holes between 11 and 12 Moore Street were situated, as no historic fabric remains between these two buildings.

However, investigations of the party wall between 12 and 13 More Street, on the inside of No.13 revealed two probable infilled creep holes. The first is at ground level in the front room, but this does not seem large enough for use. It may indicate an abandoned attempt to create a creep hole.

The second is on the first floor in the rear room. This has been categorised as a creep hole formed and used by the Volunteers as they moved along the terrace (Fig. 6).

The party wall between Nos. 12 and 13 is a surviving historic wall, which was retained as a nib (see Fig. 4), during phases of demolition and new construction on the two sites in the 1960s and '70s.

This historic wall is two-storey in height with concrete infill above. The discovery of creep holes in this surviving party wall is significant, given the direct relationship to the 1916 Rising.

Witness accounts refer to the deaths of five civilians on Moore Street over the Friday evening by British fire along the street. One of the civilians, Patrick McManus, was a resident of 12 Moore Street. Witness statements from Oscar Traynor (WS 340) and Feargus de Burca (WS 105) describe seeing his body on the street, wrapped in a white sheet that he had apparently used as a flag of truce.

In August 1916, Thomas F. Cogan made a claim to the Property Losses (Ireland) Committee, 1916 for damage to 12 Moore Street caused by gunshots and looting of the property during the Rising (Claim No. 118). The claim paid by the Committee amounted to £22.00. The Particulars of the Claim submitted noted restoration of the premises as one of the costs indicating that the building fabric required repair. Two further claims were made to the Committee – one from Arthur Williams (Claim No. 4045) and one from Bridget McManus (Claim No. 4316). Both of these were for household goods, with Bridget McManus's claim noting that her husband was shot during the Rising.

Post-1916

Patrick McGivney, a cutler, occupied the building from 1917 to 1918. The shop appears to have been unoccupied in 1919. From 1920 to 1955, the building was occupied by provisions merchants with P.J. Byrne, a grocer occupying the building through to the mid-1960s. Goad's Insurance Plan of 1961 illustrates the building as a three-storey structure in use as '*Shop and tenements*' (Fig. 9). The adjacent plot at 13 Moore Street is shown as empty on Goad's 1961 Plan, with a note reading '*Site for Proposed Shop Feb '61*'.

By 1960, the upper floor tenements of No. 12 are described as being in '*ruins*'. The building was vacant from 1967, according to Thom's Directory. An image of Moore Street dated 1971, in the Dooley and Hall report on Nos.10-25 Moore Street, shows the structure reduced to a single storey premises by that time, following removal of the upper floors (2019, 9).

In 1975, a planning application was submitted for the *Reconstruction of Bakery Shop and Offices* at 12 Moore Street (Reg. Ref. 2579/75). The drawings show a modern concrete post and beam structure, with no reference to retained fabric or structures. K.C. Confectionary were also granted permission in 1978 to rebuild No. 11 as a shop and bakery.

Thom's Directory of 1980 lists K.C. Confectionary as occupying No. 12, though they had vacated No. 11 by then. In 1985, Thom's Directory links Nos. 12 and 13 as one entry occupied by '*Susan's Dublin's Best Confectionary, confctnrs (cakes)*'. The ground floor has continued in various commercial uses. The first floor is vacant.

References:

- (Digital records accessed 21/02/2022)
 - *City of Dublin*, held by Ordnance Survey Ireland. © Public domain. Digital content: © Ordnance Survey Ireland, published by UCD Library, University College Dublin, 1847, Sheet 14
<http://digital.ucd.ie/view/ucdlib:40835>
 - *City of Dublin*, held by Ordnance Survey Ireland. © Public domain. Digital content: © Ordnance Survey Ireland, published by UCD Library, University College Dublin, 1864, Sheet 14
<http://digital.ucd.ie/view/ucdlib:40836>
 - *City of Dublin*, held by Ordnance Survey Ireland. © Public domain. Digital content: © Ordnance Survey Ireland, published by UCD Library, University College Dublin, 1891, Sheet DN018_047
<http://digital.ucd.ie/view/ucdlib:40918>
 - Chas E. Goad Limited *Insurance Plan of the City of Dublin Vol.1: Sheet 4, 1893*
<http://www.bl.uk/onlinegallery/onlineex/firemaps/ireland/mapsu145ubu4u2uf004r.html>
- (Digital records accessed 24/02/2022)
 - Records of the Property Losses (Ireland) Committee, National Archives of Ireland
<http://centenaries.nationalarchives.ie/centenaries/plc/index.jsp>
- *Census of Ireland 1901 and 1911* (<http://www.census.nationalarchives.ie/> accessed 09/03/2022)

- Department of Housing, Local Government and Housing, *Architectural Heritage Protection Guidelines for Planning Authorities*, 2011
- Dooley, Prof. T. & Hall, Dr D. (2019) *Historical survey of the provenance of 10-25 Moore Street, Dublin, c.1901-1970*. Report commissioned on behalf of the Moore Street Advisory Group
- Molloy & Associates, *Baseline Assessment of 1916 and 1922 Battlefields*, Appendix A4, planning application reference 2862/21
- Molloy & Associates, *Appendix A4.4: Building Inventory, Record and Description for Nos 11-12 Moore Street, 15-16 Henry Place and 5A Moore Lane*, submitted with planning application reference 2862/21
- Myles, F. (2012) *Battlefield Archaeological Assessment: Moore Street and Environs*
- The National Inventory of Architectural Heritage Survey of Dublin City, Stage 1 Ministerial Recommendations issued on the 4th of June 2014

NIAH Record:

The NIAH uses eight categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, technical & social) and identifies five categories of rating in seeking to rank buildings. The NIAH rating values are International, National, Regional, Local and Record Only (I, N, R, L, O). Structures which are considered of International, National, and Regional significance are deemed worthy of inclusion on the RPS.

The National Inventory of Architectural Heritage (NIAH) survey has been carried out for the area under Stage 1 of the Dublin Survey. 12 Moore Street was surveyed, but not recorded.

Assessment of Special Interest under the Planning and Development Act 2000:

The Conservation Section considers the two-storey, historic brick party wall (only) between 12 and 13 Moore Street, to be of historical, cultural and social interest, as follows:

HISTORICAL

The location (site) of 12 Moore Street is of historical significance due to its direct connection with the events of the 1916 Rising. The Witness Statements collected from Volunteers in the late 1940s refer to No. 12 Moore Street in their recounting of the evacuation from the GPO and the occupation of buildings on Moore Street during the final hours of the Rising. The *Architectural Heritage Protection Guidelines for Planning Authorities* state that the '...some events or associations may be so important that the place retains its significance regardless of subsequent alteration.' (2011, p. 25). However, 12 Moore Street was substantially demolished and rebuilt circa 1975.

Nevertheless, the surviving, historic party wall in-between 12 and 13 Moore Street retains important historic fabric relating to 1916 and contributes to the understanding of the route the Volunteers took through the buildings. Consequently and despite the loss of the all other elements of the pre-1916 structure at 12 Moore Street, this section of wall is of high historical significance. 12 Moore Street is also known to have been the home of one of the civilians killed during the Rising.

CULTURAL

The position of 12 Moore Street within the group of buildings along the east flank of Moore Street occupied by the Volunteers during the final hours of the Rising has conferred a cultural significance on the plot over the course of the past century. The *Architectural Heritage Protection Guidelines for Planning Authorities* state that special interest can be assigned to sites/structures '...that have acquired cultural significance with the passing of time.' (2011, 28). The 1916 Rising was a seminal event in Irish history that has understandably taken on cultural importance, and this, naturally, includes sites that played a role in the events of that week.

SOCIAL

12 Moore Street is considered to be of social significance due to its association with the Easter Rising evacuation route. The *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) state that 'the characteristic of special social interest embraces those qualities for which a structure, a complex or an area has become a focus of ... political, symbolic or other sentiment to any group of people'. The 1916 Easter Rising was a defining moment in Ireland's struggle for independence.

The Conservation Section considers that the modern building at 12 Moore Street is of no special interest under the provisions of Sections 51 and 54 of the Planning and Development Act, 2000 (as amended). However, the surviving historic, two-storey party wall sandwiched between 12 and 13 Moore Street, with evidence of infilled creep holes relating to the 1916 Rising, is considered to be of 'National' significance, based on the NIAH significance/ratings above.

Conclusion:

The previous building at 12 Moore Street formed part of the evacuation route in 1916, being one of the structures through which the Volunteers 'burrowed' on the night of April 28th as they moved through the terrace on Moore Street. However, 12 Moore Street was demolished and rebuilt in the late 1970s, with much of the previous fabric lost.

Notwithstanding that demolition, the party wall between 12 and 13 Moore Street was retained. This surviving historic wall includes evidence of creep holes from 1916. This structure is of special historical, cultural and social interest and merits inclusion of the City Council's Record of Protected Structures.

The extent of the proposed Protected Structure status and curtilage is outlined in Fig. 2 of this document (below).

It is now proposed to initiate the statutory process for the proposed addition of this element only of the structure to the Record of Protected Structures. This includes undertaking a statutory public consultation process in accordance with Section 55 of the Act. Following the statutory consultation process, a further report will be prepared taking any submissions and observations received into consideration, with a recommendation to the City Council to proceed or not with the proposed addition, or with a recommendation including amendments to the proposed addition.

Recommendation:

The current, modern building at 12 Moore Street, Dublin 1, does not merit inclusion on the Record of Protected Structures in its entirety. However, the surviving two-storey, historic brick party wall between 12 and 13 Moore Street merits inclusion on the Record of Protected Structures.

It is recommended that the statutory process to initiate the proposed addition of the two-storey historic brick party wall in-between 12 and 13 Moore Street, Dublin 1, to the Record of Protected Structures, in accordance with Section 54 and 55 of the Planning and Development Act, 2000 (as amended), be noted.

Recommendation	
Address	Description (to appear on RPS)
12 Moore Street, Dublin 1	Two-storey, historic brick party wall (only) between 12 and 13 Moore Street, with evidence of 'creep holes' from 1916

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.



Paraic Fallon
Senior Planner, Conservation Section
Planning & Property Development Department

29/06/2022

Date

Extent of Protected Structure Status

The extent of protected structure status and curtilage is shown on the map below.

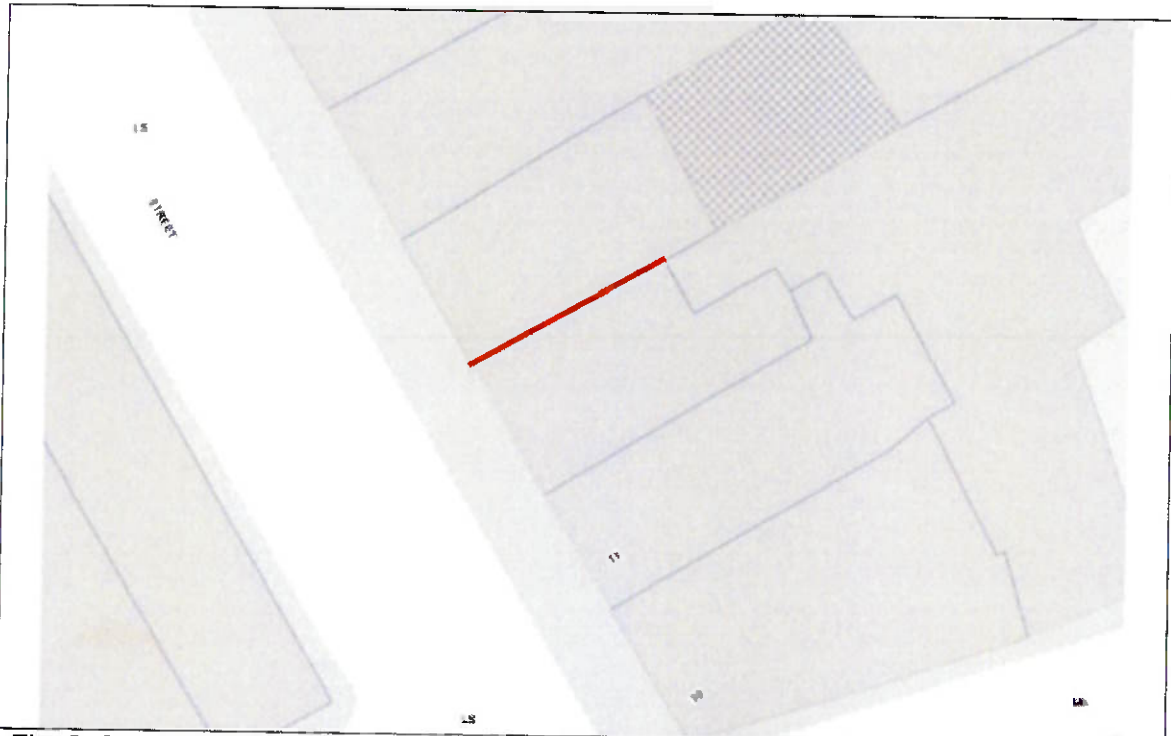


Fig. 2: Section of historic brick party wall between 12 and 13 Moore Street, Dublin 1: extent of Protected Structure status and curtilage outlined in red.

Photographs:

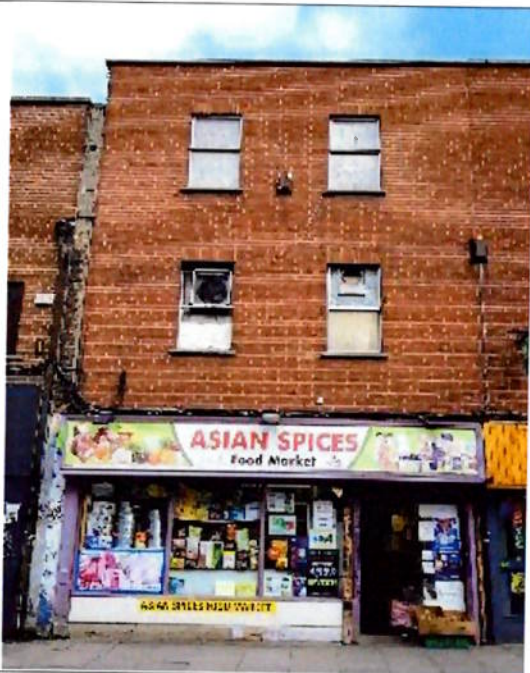


Fig. 3: West elevation of 12 Moore Street



Fig. 4: Historic party wall between 12 and 13 Moore Street; outlined in red



Fig. 5: First floor window opening with modern frame



Fig. 6: Infilled 'creep hole' in party wall to 12 and 13 Moore Street; encircled in red. Photo from inside No.13

Historic Maps

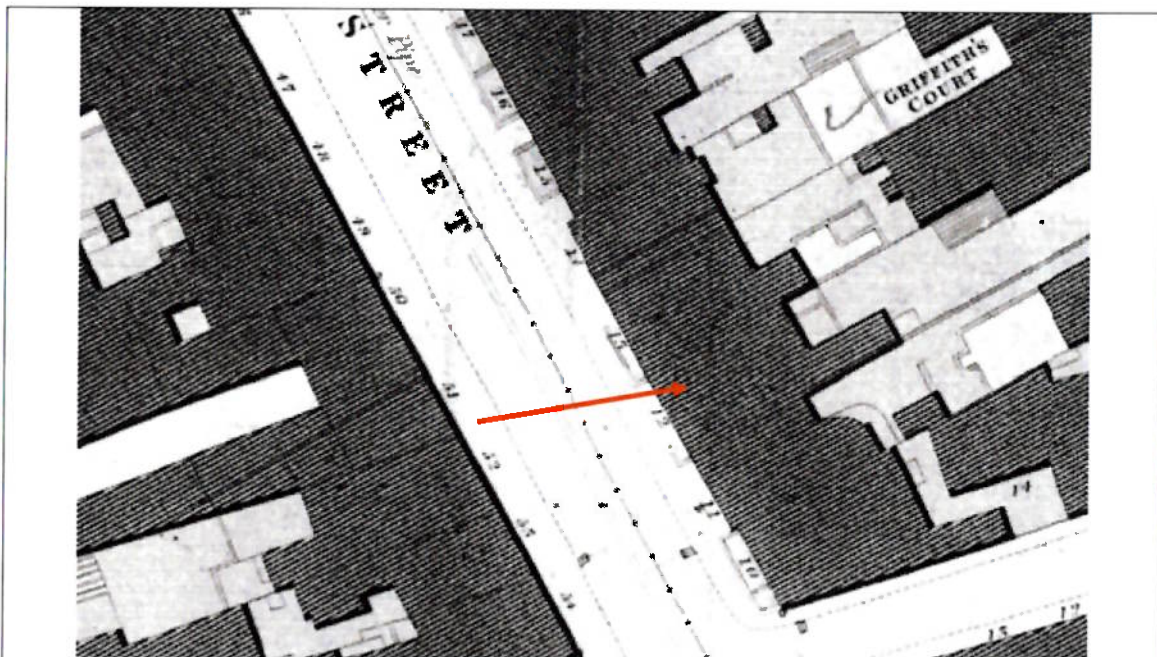


Figure 7: 1847 Ordnance Survey Town Plan Series. Location of the current building arrowed red.

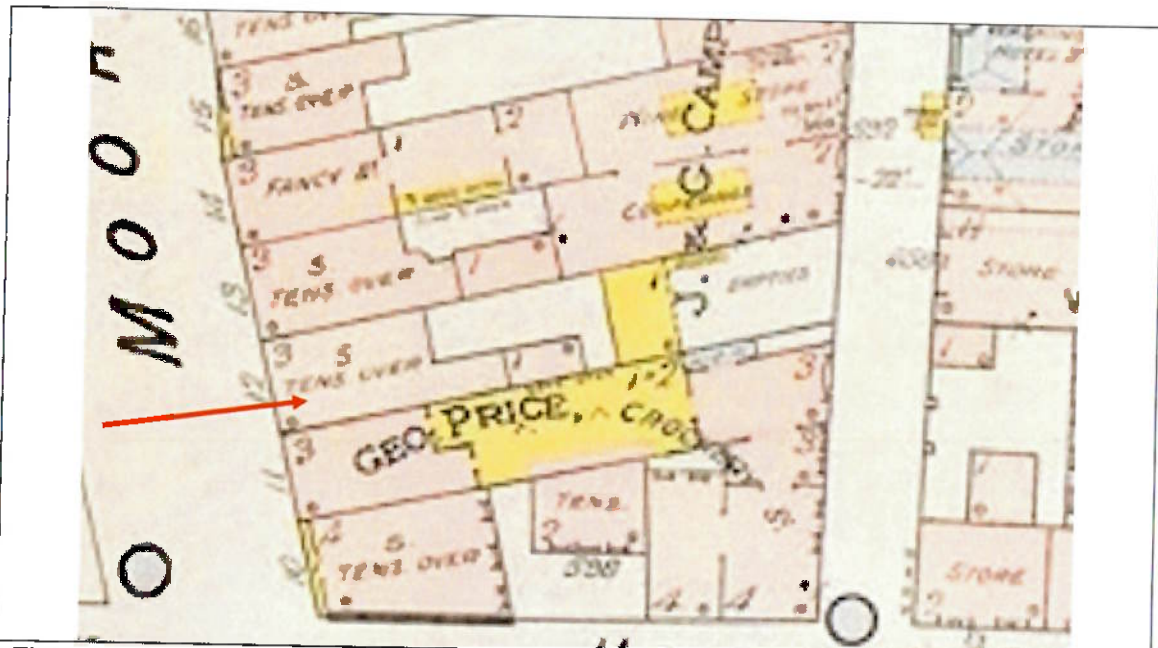


Figure 8: 1893 Goads Insurance Plan of the City of Dublin. Location of the current building arrowed red.

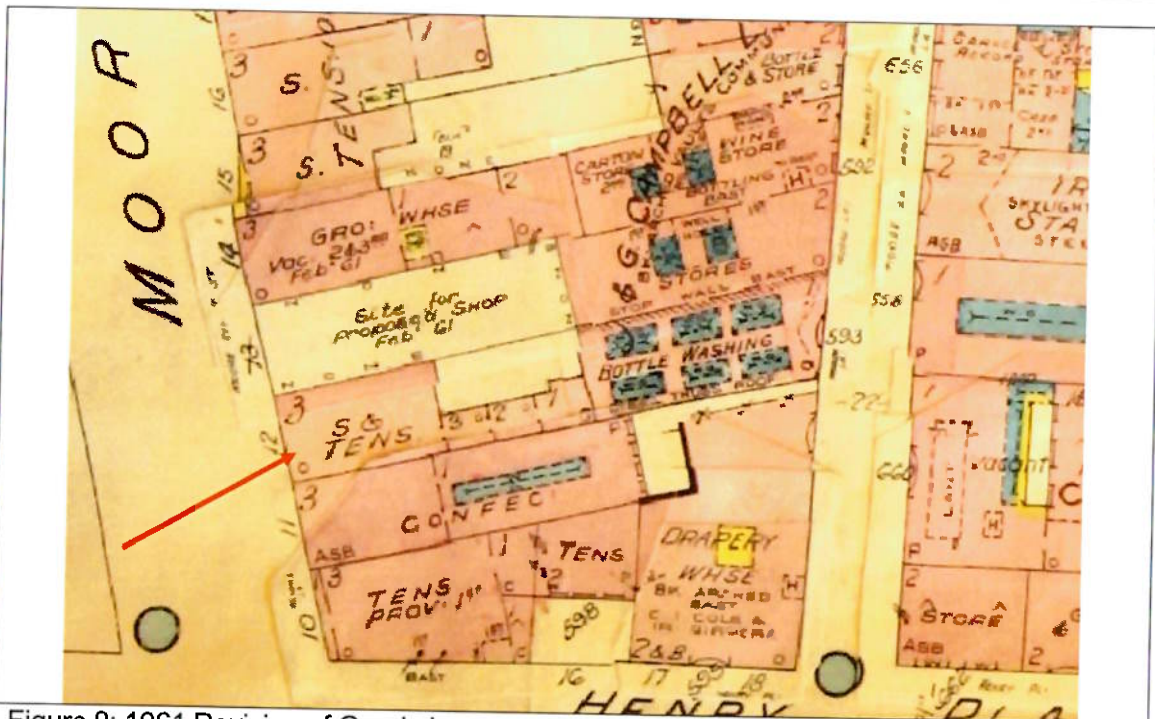


Figure 9: 1961 Revision of Goads Insurance Plan of the City of Dublin. No. 12 Moore Street arrowed red.

Conservation Section, Planning & Property Development Department
Civic Offices, Wood Quay, Dublin 8

An Rannóg Caomhantais, An Roinn Pleanála agus Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Email: conservation@dublincity.ie T. 01 222 3927

29 June 2022 (updated from previous report dated 21st March 2022)

To the Chairperson and Members of the Central Area Committee

Initiation of the Statutory Process for the Proposed Addition of the historic two-storey historic brick party walls (only) to the north and south sides of 13 Moore Street, Dublin 1, to the Record of Protected Structures in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended).

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

Photograph of Structure



Request and Reason for Addition:

- The Elected Members of Dublin City Council at the monthly council meeting held on 14th June 2021, passed a motion (Emergency Motion No. 1) put forward by Councillors Micheál Mac Donncha, Máire Devine, Janice Boylan, John Lyons, Cieran Perry, Christy Burke, Daithí Doolan, Seamus McGrattan, Larry O'Toole, Daniel Céitinn, Anthony Connaghan; *"That this City Council, in relation to the Hammerson application for the development of the Dublin Central site that includes the demolition of 1916 buildings, structures and fabric on Moore Street, calls for the completion of the stalled process to add five buildings on the site to the record of protected structures as agreed by this council; we further call for the terrace 10-25*

Moore Street to be added to the record of protected structures as a matter of urgency so that a full assessment of all 1916 buildings, carried out by suitably qualified independent experts, can be made available."

Nos. 14-17 Moore Street inclusive are a National Monument and each of the four buildings is a Protected Structure; RPS Ref. Nos. 5282, 5283, 5284 and 5285, respectively.

An RPS assessment report has been completed for No. 10 Moore Street and Nos. 20/21 Moore Street, with recommendations in both instances for the proposed addition of the buildings to the City Council's Record of Protected Structures.

The remaining buildings in this terrace, i.e. Nos. 11, 12, 13, 18, 19, 22/23, and 24/25 Moore Street, referred to above, have now been assessed individually with a separate report for each. No. 13 Moore Street, Dublin 1, forms the subject of this report.

Location and Land Use Zoning:

The subject structure is located in an area zoned Z5, the objective of which is "To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity".



Figure 1: Site Location and Land Use Zoning

Architectural Conservation Area:

No. 13 Moore Street is not within an Architectural Conservation Area, but is proximate to the designated O'Connell Street ACA (2001); shown in green coloured diagonal cross hatch on Fig. 1, above.

Relevant Planning History:

Planning Ref.	Description	Decision Date
2479/08	Description has been abbreviated 7 year permission for development at an overall site of c 2.17 hectares, at nos 40-41, 42 (a protected structure), 43 (a protected structure), 44 (a protected structure), 45-51, 52-54 (protected structures), 55-56, 57 (a	Grant Permission on appeal per PL29N.232347: 24/03/2010

Planning Ref.	Description	Decision Date
	<p>protected structure), 58 (a protected structure), 59, 60 (a protected structure) and 61 (a protected structure) and 60a (otherwise 5 Henry Place) O'Connell Street Upper, Nos 37-41a Henry Street, nos 1-13, 14-17 (protected structures and a national monument) and 18-25 Moore Street, nos 71 and 71a Parnell Street, nos 1-8 O'Rahilly Parade, nos 1-15 Moore Lane, Nos 4-13 (including 3 Moore Lane) and 15-18 Henry Place, nos 6-8 at the junction of Henry Place and Moore Lane and including Clarkes Court off Moore Street, Moore Place off Henry Place, Murphys Court off Moore Lane, part of Moore Lane from the junction of Henry Place and Moore Lane to the junction of Moore Lane and O'Rahilly Parade and part of Henry Place from the junction of Moore Street and Henry Place to the rear of no. 61 O'Connell Street Upper (a protected structure), Dublin 1. The site consists of the majority of a city block bounded by Parnell Street, Moore Lane, O'Rahilly Parade, Moore Street, Henry Street, Henry Place and O'Connell Street Upper, but for the avoidance of doubt excludes nos 70 & 72-75 Parnell St, Nos 37-39 & 62-69 O'Connell St Upper, Nos 31-36 Henry St & Nos 1-3 Henry Place, Dublin 1.</p> <p>The proposed development has a gross floor area (GFA) of 158,026sqm; including 109 no. retail units and an anchor store, 110 no. retail units in total (c 56,155sqm); 17 no. cafe/restaurant/bar units (c 5,372sqm); 108 no. residential units; office space (c. 2,893sqm); a gallery (c. 903sqm); a visitor attraction or 'Sky Lift', viewing deck and ticketing area (c. 435sqm); a drop in facility (c. 157sqm); a commemorative centre (c. 268sqm), an assembly hall (c. 320sqm); 2no. new public streets, 3 no. public spaces at street level, a roof garden (c1258sqm); an outdoor performance space (c263sqm); communal residential open space, (c2554sqm); 1115 no. car parking spaces, 560 no. bicycle parking spaces, a c30m high 'green wall' or hydroponic vertical garden with feature lift on the Henry Street frontage, and ancillary uses, with a minimum height above ground of 3 no. storeys, a maximum height of 13 no. storeys and 5 no. basement levels.</p> <p>Note: permission granted for demolition of 13 Moore Street under Reg. Ref: 2479/08.</p>	
2479/08X1	As above – Extension of Duration of Planning Permission granted per PL29N.232347.	Extension of Duration granted: 21/07/2016
2435/11	Change of use planning permission with retail/commercial use. The proposed planning permission will convert the existing structure to a restaurant. The development will consist of a new signage to the front of the building and the refurbishment to the ground floor only. The gross floor area shall be 99sqm which will accommodate a restaurant and kitchen.	Grant Permission 13/05/2011
2862/21	PROTECTED STRUCTURE: Dublin Central GP Limited intends to apply for Permission for a period of 7 years at a site, 'Dublin Central - Site 4', (c. 0.3 Ha) 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. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane), Dublin 1 and otherwise generally bounded by No. 22 Moore Street and No. 13 Moore Lane to the north, Moore Lane to the east, Moore Street to the west and Henry Place to the south. Nos. 14 - 17 Moore Street (National Monument / Protected Structures) is bounded north and south by the proposed development. The proposed development comprises a mixed-use scheme (c. 3,290 sq. m gross floor	Grant Permission 12/01/2022; now on appeal to An Bord Pleanala

Planning Ref.	Description	Decision Date
	<p>area) in 2no. parts located north and south of the Nos. 14 - 17 Moore Street (a National Monument / Protected Structures) ranging in height from 1 - 3 storeys including retained independent single storey basements comprising 15no. apartment units (c. 1,454 sq. m gfa), café / restaurant use (c. 864 sq. m gfa), retail use (c. 617 sq. m gfa), cultural use (c. 60 sq. m gfa) and office use (c. 295 sq. m gfa). The proposed development to the north of Nos. 14 - 17 Moore Street consists of: - Nos. 20 - 21 Moore Street are refurbished and adapted to provide 1no. café / restaurant / licenced premises with takeaway / collection facility (c. 80 sq. m in total) at ground floor addressing both Moore Street and proposed new public plaza to the rear and 1no. 1-bed apartment and 1no. 2 bed apartment located at 1st and 2nd floor level - 4no. in total (cycle and bin storage at ground floor level). No terraces or balconies are proposed to the residential units; Provision of a new 2 storey extension at the side of No. 17 Moore Street (National Monument / Protected Structure) to act as an extension for ancillary use to the National Monument - a cultural facility (c. 60 sq. m gfa); Provision of an archway between the gable of No. 20 Moore Street and the new 2 storey extension to No. 17 Moore Street (National Monument / Protected Structure) to form an entrance to a new public plaza off Moore Street; Provision of a 2 storey building with profiled roof consisting 1no. licenced restaurant / café unit with takeaway / collection facility (c. 250 sq. m gfa) etc.</p> <p>Note: The proposed development consists of the demolition of No. 13 Moore Street with the retention of the historic party wall at Nos. 12/13 Moore Street; now the subject to appeal to An Bord Pleanála.</p>	

Recent Enforcement History:

E1011/09 and E0866/11.

Description:

13 Moore Street, Dublin 1, was inspected by the Conservation Section on the 19 July 2021 as part of the architectural heritage assessment of the proposed development per Reg. Ref. 2862/21.

This description is based on that internal and external inspection, along with consideration of available research and documentation, the architectural heritage documents submitted as part of planning application Reg. Ref: 2862/21, and a more recent external inspection in March.

Exterior:

Two-bay, two-storey commercial premises with two-storey return to rear (east) built c.1960 incorporating an historic brick party wall between Nos.12 and 13. Single-storey flat roof addition to rear, opening onto enclosed yard. Flat roofs, obscured from view with cast-iron hopper and downpipe to front. Machine-made red brick to principal (west) elevation laid in English garden wall bond rising to a flying façade at second floor level. Concrete coping to principal facade. Section of historic brick party wall to junction with No.12 Moore Street comprising hand-made brick laid in lime mortar, (evident above shop fascia, rising two-storeys in height). Cement-rendered finish to rear elevation. Corrugated-iron sheeting to east elevation of single-storey addition. Square-headed window openings to first floor of principal elevation having concrete sills, now boarded up. Square-headed window openings to rear elevation carrying timber casement windows. Modern shopfront to ground floor with roller shutter. Modern block built boundary walls to rear yard.

Interior:

Modern floor plan comprising subdivided retail space at ground level serviced by a kitchenette and W.C. Nib walls to north and south possibly concealing concrete superstructure. Single-storey extension to rear/east. Modern staircase rising to first floor in two flights. Accommodation at first

floor, now with dividing partition removed, providing largely open-plan space with the exception of a separate W.C. Walls generally with plasterboard/painted finish however the targeted removal of sections of plaster reveal a retained historic party wall, of hand-made brick laid in lime mortar, between Nos.12 and 13 Moore Street.

Historical Background:

Moore Street was laid out in the early 18th century on lands owned by the Earls of Drogheda, and was further developed in the later part of the century under Luke Gardiner. Bernard Scalé's 1773 edition of John Rocque's map of the city and suburbs of Dublin record Moore Street with densely packed terraced residential properties having stabling and warehousing to the rear.

By the 19th century the street had developed as a commercial and market district with residential accommodation provided over ground floor shop units. The first edition Ordnance Survey map of 1847 records No.13 Moore Street with a return to the rear (east) and a light-well to the front pavement. Further detail is provided by Goads Insurance Plan of 1893 which records the property as a three-storey building with a full-height return¹. A shop, (recorded as a dairy by the corresponding street directories of the period), is shown at ground floor having tenements above. The site to the rear, now with a separate address of Nos. 6-7 Moore Lane (previously Old Brick Lane) is in use as stores under J. & G. Campbell Ltd, tea and wine merchants.

A photograph of the street from mid-20th century captures No.13 prior to the construction of the present building c.1963 – this confirms that the building had conformed to the 18th century Dutch Billy typology, having a gabled façade (see Dublin Central Masterplan, Appendix A4.5 Building Inventory Record & Description for No.13 Moore Street, May 2021, pg.2, Planning Ref: 2862/21).

1916 Historical Association

Moore Street and its environs bore witness to the urban conflict of Easter 1916 when on the evening of Friday 28th April the leadership of the Easter Rising and a detachment of the Irish Volunteers evacuated the General Post Office (GPO) on O'Connell Street, moving along Henry Place, to take up temporary position in the terrace of buildings at Nos.10-25 Moore Street. The volunteers first entered No.10 Moore Street, with No.13 forming part of the evacuation route as the volunteers broke through the successive party walls, northward to reach No. 25. A number of witness statements collected by the Bureau of Military History recount the tunnelling of the walls to form 'creep holes' across the terrace, (WS 694 & 370 etc). *'The technique of burrowing through walls had already been utilised by Republican detachments to the rear of the GPO and in positions on the far side of Sackville Street and had been recommended as a tactic by Connolly. Progress through the brick walls, in many cases a single stretcher thick, would have been rapid, although it appears only a single large crowbar was available'*, (Shaffrey & Myles 2012, 54).

More recently, the targeted stripping of wall plaster in 13 Moore Street exposed infilled 'creep holes' at both ground and first floor in the retained party wall situated in-between Nos.12 and 13.

Another infilled creep hole is known at first floor level in the retained party wall between 13 and 14 Moore Street, which forms part of the National Monument.

Post 1916

Claims submitted to The Property Losses (Ireland) Committee in the aftermath of April 1916 record damage to commercial and residential property on Moore Street, as well as losses incurred from the looting of goods. The inspectors report for a claim made by the owner of 13 Moore Street, refers to *'interior damage caused by the rebels'* which the claimant described as the *'rebuilding and plastering [of] side walls (gaps) over shop'* (PLIC/1/2197). It is plausible that the repair of 'gaps' to the 'side walls' outlined in the particulars of the claim may refer to the infilling and making good of the creep holes which had been formed by the Volunteers as they broke through the party walls with No.12

¹ Curiously, Goads Insurance Plan of 1893 does not record a basement, despite the depiction of a lightwell to the front pavement of the property on the 1847 Ordnance Survey map.

and No.14. A further claim was made by the proprietor of the dairy shop, which occupied the ground floor at No.13, in relation to the loss of business caused by possession of the property by the volunteers, to include the damage of goods and '10 gallons of destroyed milk', (PLIC/1/0284).

On completion of the repairs following 1916, No.13 Moore Street continued in use as a dairy until the 1960s when the building was demolished and rebuilt as a two-bay, two-storey commercial premises².

The 1961 Revision of Goads Insurance Plan captures the site following demolition of the dairy and prior to construction of the current replacement building – this records the vacant plot as a 'site for proposed shop' (see Fig. 9 below).

The construction of the new building at 13 Moore Street retained and incorporated a two-storey section of the historic brick party wall between 12 and 13 Moore Street – this section includes infilled creep holes which had been formed by the volunteers during Easter 1916, at ground and first floor.

This retained section of the historic party wall also survived the later rebuilding of 12 Moore Street c.1975 (Reg. Ref: 2579/75) with an image from the period capturing the wall, exposed as part of the construction works (Uncited image, Dooley & Hall Report, 2019, pg.9).

Today the historic two-storey brick party wall is evident in the façade, between the late 20th century brick buildings of Nos. 12 and 13 (see Figs. 3 – 6 below). The premises remained in mixed commercial use through to the late 20th century, though it is currently vacant.

References:

- Dooley, Terence & Hall, Donal Report (2019) Historical survey of the provenance of 10-25 Moore Street, Dublin c. 1901-1970. Report carried out for the Moore Street Advisory Group.
<https://www.gov.ie/pdf/?file=https://assets.gov.ie/86217/815e932a-af22-434f-861a-086ecd1bd673.pdf#page=null>
- Department of Arts Heritage and the Gaeltacht, Architectural Heritage Protection Guidelines for Planning Authorities, 2011.
- Goad, Charles, Insurance Plan of the City of Dublin, 1893.
- Goad, Charles, Insurance Plan of the City of Dublin, 1926.
- Goad, Charles, Insurance Plan of the City of Dublin, 1961 revision.
- Military Archives, <https://www.militaryarchives.ie/collections/online-collections/bureau-of-military-history-1913-1921/bmhsearch/>
- Molloy & Associates Conservation Architects (2021) Dublin Central Masterplan Area Conservation Plan. Report submitted with Planning Reference 2862/21.
- Molloy & Associates Conservation Architects (2021) Architectural Heritage Impact Assessment Dublin Central Masterplan Area – Site 4. Report submitted with Planning Reference 2862/21.
- Ordnance Survey Town Plan Series for Dublin City 1847.
- Property Losses (Ireland) Committee, <http://centenaries.nationalarchives.ie/centenaries/plic/index.jsp>
- Shaffrey Associates Architects & Franc Myles, Archaeology & Built Heritage (06 February 2012) *Application for Ministerial Consent to carry out Works at 14 – 17 Moore Street, Dublin 1, a National Monument*. Unpublished Report submitted to Department of Arts, Heritage and Gaeltacht in response to a Request for Additional Information.
- Thom's Official Almanac and Street Directory for Dublin.
- Valuations Office, cancelled books 1882 to present day.

² Although the 1847 O.S map recorded a light well to the front pavement of the building which formerly occupied the site at No.13 Moore Street, suggesting that this had incorporated a basement, the present building does not include a sub-level. It is likely that any previously existing basement was backfilled as part of the demolition and construction works c.1961-1963, noting that planning permission for works to the adjacent property at No.12 Moore Street c.1975 conditioned the 'infilling of the existing cellars' (Planning ref:2579/75).

NIAH Record:

The NIAH uses eight categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, technical & social) and identifies five categories of rating in seeking to rank buildings. The NIAH rating values are International, National, Regional, Local and Record Only (I, N, R, L, O). Structures which are considered of International, National, and Regional significance are deemed worthy of inclusion on the RPS.

The National Inventory of Architectural Heritage (NIAH) survey has been carried out for the area under Stage 1 of the Dublin Survey. 13 Moore Street, Dublin 1 was surveyed, but was not recorded.

Assessment of Special Interest under the Planning and Development Act 2000:

The Conservation Section considers the retained two-storey section of historic brick party wall between 13 and 12 Moore Street, and the retained historic party wall between 13 and 14 Moore Street, to be of historical, cultural and social interest.

HISTORICAL

The retained historic party walls, with infilled creep holes between 13 and 12 Moore Street and 13 and 14 Moore Street are of historical significance due to their direct connection with the events of the 1916 Rising, and in particular with the occupation of the terrace at Nos.10-25 Moore Street. The Architectural Heritage Protection Guidelines for Planning Authorities state that *'...some events or associations may be so important that the place retains its significance regardless of subsequent alteration.'* (2011, 25).

In spite of the loss of the rest of the historic built fabric around the historic party wall between Nos.12 and 13, following the demolition of No.13 c.1961 and the subsequent demolition of No.12 c.1975, the survival of the historic party walls both to No. 12 and No.14, enables the plotting of a more complete route through the terrace. The retention of party walls that incorporate creep holes formed by the volunteers during Easter 1916 adds considerably to the narrative of the conflict, providing a tangible link to this significant historical event.

CULTURAL

The survival of the historic party walls, retaining creep holes used by the volunteers to move between buildings, as is vividly recounted in the witness statements from the period, has acquired cultural significance in the intervening century. The Architectural Heritage Protection Guidelines for Planning Authorities state that special interest can be assigned to *'...more modest works of the past that have acquired cultural significance with the passing of time.'* (2011,28). The 1916 Rising was a seminal event in Irish history that has understandably taken on cultural importance, which naturally, includes surviving elements of our architectural heritage that had played a role in the events of that week.

SOCIAL

The retained historic party walls, with infilled creep holes between Nos.13 and 12 and Nos.13 and 14 Moore Street are considered to be of social significance due to their association with the Easter Rising evacuation route. The Architectural Heritage Protection Guidelines for Planning Authorities state that *'the characteristic of special social interest embraces those qualities for which a structure, a complex or an area has become a focus of ... political, symbolic or other sentiment to any group of people'* (2011,30). The 1916 Easter Rising was a defining moment in Ireland's struggle for independence.

The Conservation Section considers that the modern building at 13 Moore Street is of no special interest under the provisions of Sections 51 and 54 of the Planning and Development Act, 2000 (as amended). However, the surviving historic, two-storey party wall between 12 and 13 Moore Street, with evidence of infilled creep holes relating to the 1916 Rising, and the party wall between 13 and 14 Moore Street, are considered to be of 'National' significance, based on the NIAH significance/ratings above.

Conclusion:

The previous building at 13 Moore Street formed part of the evacuation route in 1916, being one of the structures through which the Volunteers 'burrowed' on the night of April 28th as they moved through the terrace on Moore Street. However, 13 Moore Street was demolished in the 1960s and rebuilt in the late 1970s, with much of the previous fabric lost.

Notwithstanding that demolition, a party wall was retained in-between 12 and 13 Moore Street. This surviving historic wall includes evidence of creep holes from 1916. There is also evidence of creep holes in the party wall between 13 and 14 Moore Street (the latter forming part of the National Monument and also a Protected Structure). The remaining, historic party wall are of special historical, cultural and social interest and merit inclusion of the City Council's Record of Protected Structures.

The extent of the proposed Protected Structure status and curtilage is outlined in Fig. 2 of this document (below). It is noted that No. 14 Moore Street is already on the Record of Protected Structures (RPS No. 5282) and forms part of the National Monument at 14-17 Moore Street, Dublin 1.

It is now proposed to initiate the statutory process for the proposed addition of this element only of the structure to the Record of Protected Structures. This includes undertaking a statutory public consultation process in accordance with Section 55 of the Act. Following the statutory consultation process, a further report will be prepared taking any submissions and observations received into consideration, with a recommendation to the City Council to proceed or not with the proposed addition, or with a recommendation including amendments to the proposed addition.

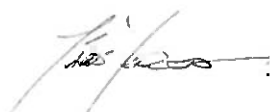
Recommendation:

The current, modern building at 13 Moore Street, Dublin 1, does not merit inclusion on the Record of Protected Structures in its entirety. However, the surviving two-storey, historic brick party walls between Nos. 13 and 12 Moore Street and Nos. 13 and 14 Moore Street merit inclusion on the Record of Protected Structures.

It is recommended that the statutory process to initiate the proposed addition of the two-storey historic brick party walls between Nos. 13 and 12 and Nos. 13 and 14 Moore Street, be noted.

Recommendation	
Address	Description (to appear on RPS)
13 Moore Street, Dublin 1	Two-storey historic brick party walls (only) between Nos. 13 and 12 and Nos. 13 and 14 Moore Street (RPS No. 5282) with evidence of infilled creep holes dating from 1916

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.



Paraic Fallon
Senior Planner, Conservation Section
Planning & Property Development Department

29/06/2022

Date

Extent of Protected Structure Status

The extent of protected structure status & curtilage is shown on the map below in red.



Figure 2: Section of surviving historic brick party wall between Nos. 13 and 12 Moore Street, and Nos 13 and 14 Moore Street, Dublin 1; extent of Protected Structure status and curtilage outlined in red. It is noted that No. 14 Moore Street is already on the Record of Protected Structures and forms part of the National Monument at 14-17 Moore Street, Dublin 1.

Photographs



Fig. 3: The principal (west) elevation of No.13 Moore Street



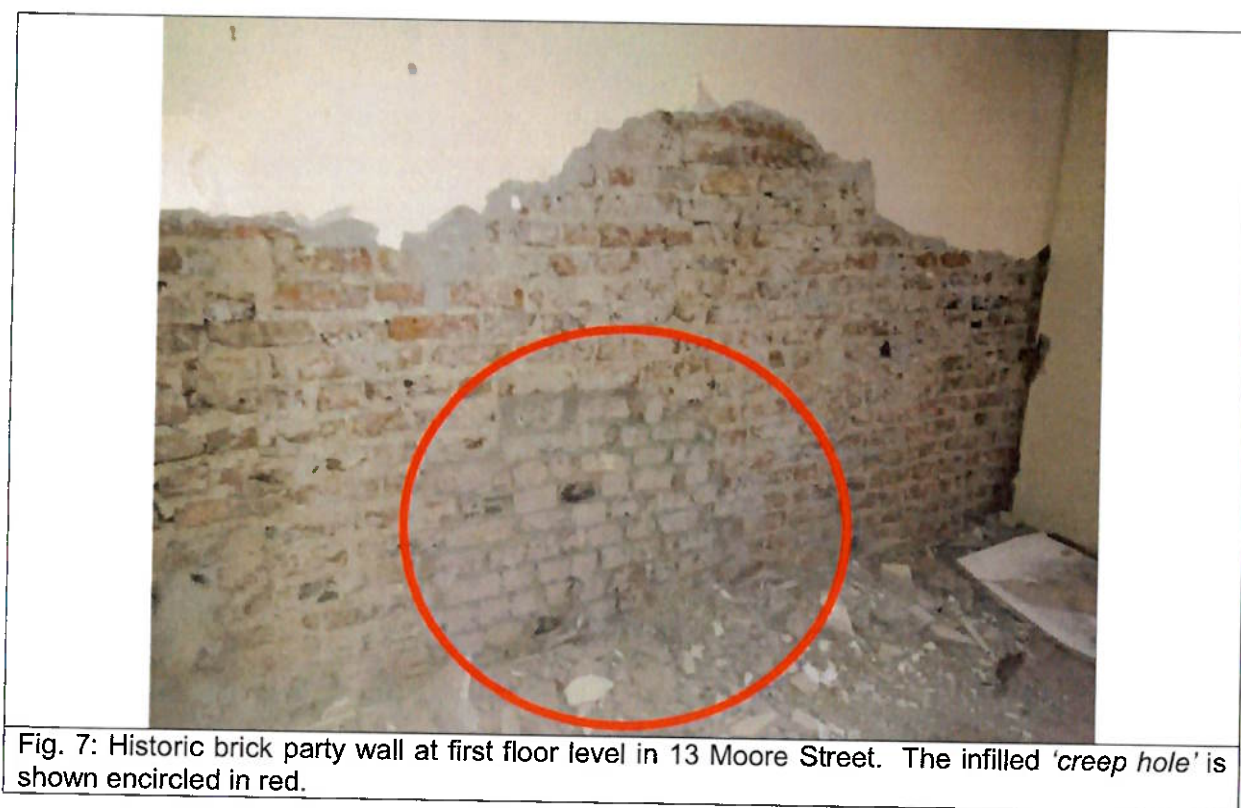
Fig. 4: 13 Moore Street in context with 14-17 Moore Street (National Monument) to LHS



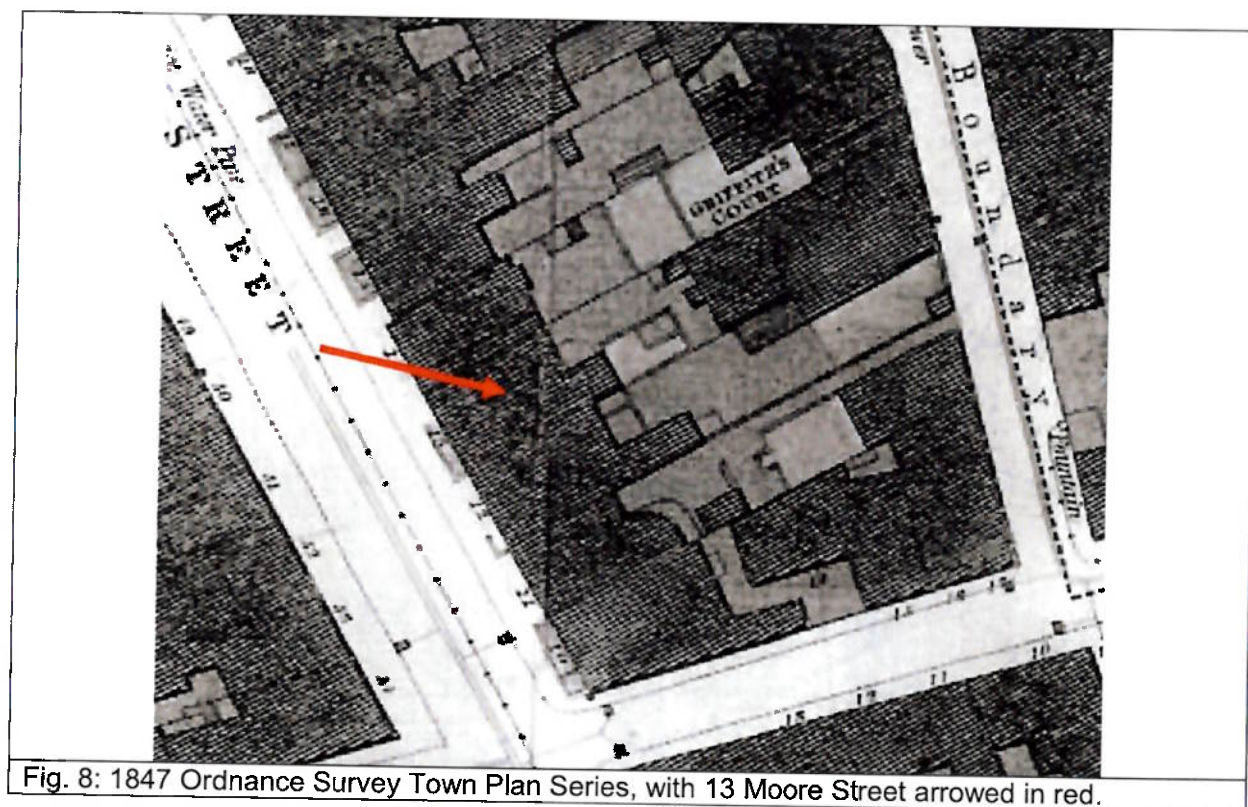
Fig. 5: Retained two-storey section of historic party wall (encircled red) between the modern new-builds at 12 (RHS) and 13 (LHS)



Fig. 6: Detail of the retained historic brick party wall between 12 and 13 Moore Street



Historic Maps



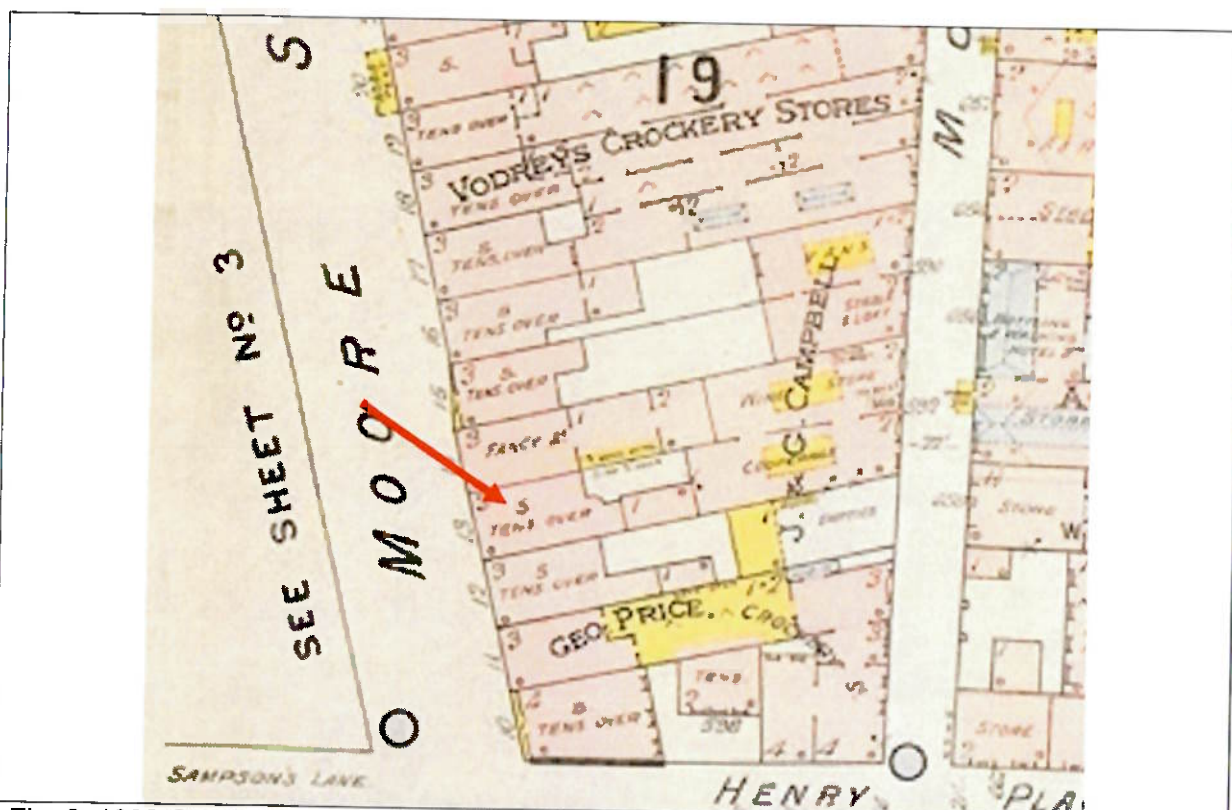


Fig. 9: 1893 Goads Insurance Plan of the City of Dublin, with 13 Moore Street arrowed in red.

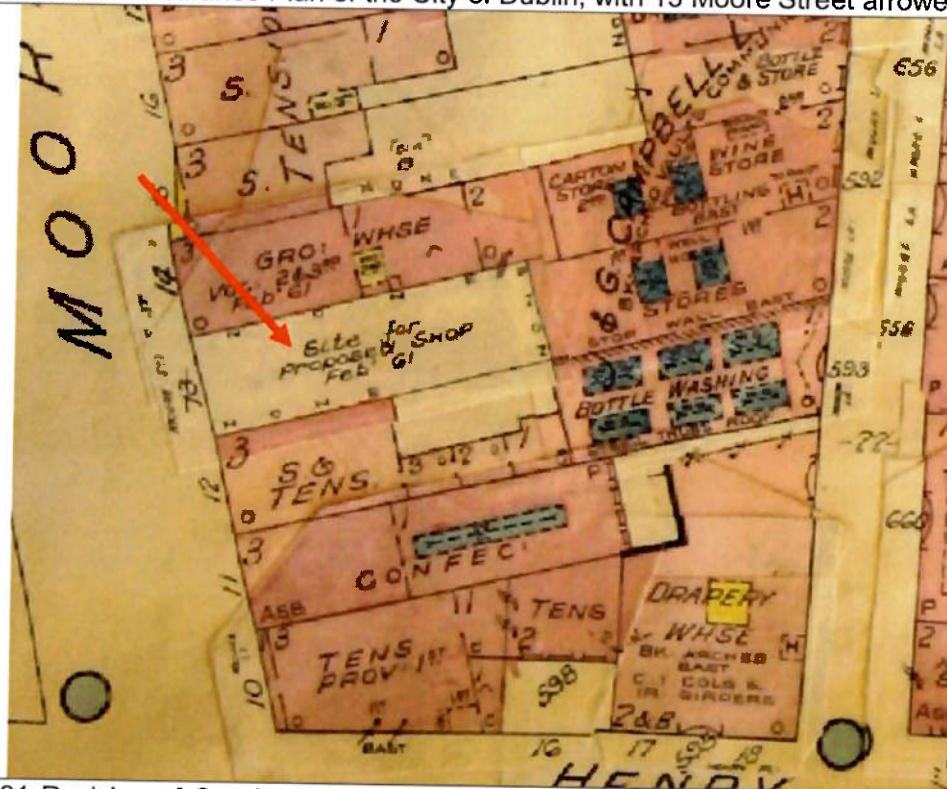


Fig. 9: 1961 Revision of Goads Insurance Plan of the City of Dublin showing the plot of No.13 Moore Street cleared in preparation for construction of the current building (1961-63); arrowed in red.

Conservation Section, Planning & Property Development Department
Civic Offices, Wood Quay, Dublin 8

An Rannóg Caomhantais, An Roinn Pleanála agus Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8
Email: conservation@dublincity.ie T. 01 222 3927

29 June 2022 (updated from previous report of 15 March 2022)

To the Chairperson and Members of the Central Area Committee

Initiation of the Statutory Process for the Proposed Addition of the ground floor façades to Henry Place and Moore Lane of 17/18 Henry Place (former Bottling Stores), Dublin 1, to the Record of Protected Structures in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended).

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

Photographs of Structure



Request and Reason for Addition:

- The Elected Members of Dublin City Council at the monthly council meeting held on 8th June 2015, passed a motion put forward by Councillor John Lyons (Motion 44): *"That the following 1916 Buildings (Add 569), identified in the Franc Myles Battlefield Report, commissioned by Shaffrey Associates on behalf of Chartered Land, be added to the list of protected structures as buildings of National historical importance. 1. O'Briens Mineral Water Building, Henry Place - Occupied by volunteers. 2. The White House, Henry Place - Occupied and held by Michael Collins. 3. No.10 Moore Street - Point of entry -The First Council of War - Overnight stay. 4. The Bottling Stores rear 10 Moore Street and Moore Lane - Occupied by Frank Henderson. 5. Hanlons, 20/21 Moore Street - Surrender order accepted by volunteers after consultation with Thomas Clarke, Joseph Plunkett, Michael Collins and Sean Mac Diarmada".*

The five buildings referred to in the first bullet point above have been assessed individually with a separate report for each. 17/18 Henry Place, Dublin 1, forms the subject of this report.

Location and Land Use Zoning:

The subject structure is located in an area zoned Z5, the objective of which is "To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity".

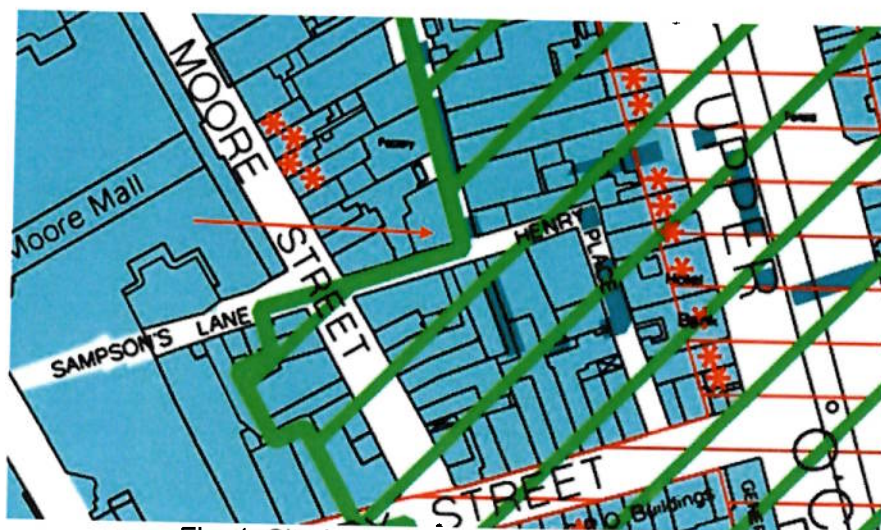


Fig. 1: Site Location and Land Use Zoning

Architectural Conservation Area:

17/18 Henry Place is not within an Architectural Conservation Area, but lies adjacent to the designated O'Connell Street ACA (2001); shown in diagonal green coloured cross hatch on Figure 1, above.

Relevant Planning History:

Planning Ref.	Description	Decision Date
1355/98	The project includes two floors of car-parking below basement level (capacity 720 cars); four floors of mixed Retail and Leisure uses (approx. 40,000 sq.m. gross floor area) and comprising of Department Stores, retail units, restaurants, bars, family entertainment centre and tourist information. Also, on the upper level there are 15 multi- purpose auditoriums for cinema, conference and theatre uses. There is also a 61 bedroom hotel with associated function rooms at 46/49 Upper O'Connell Street which is presently occupied by Fingal County Council. The proposal involves building under, on and over part of Moore Lane. The listed facades of Nos. 57, 58 and Nos.52/54 Upper O'Connell Street are being retained as part of the development.	Grant Permission: 23/10/1998
2479/08	<i>Description has been abbreviated</i> 7 year permission for development at an overall site of c 2.17 hectares, at nos 40-41, 42 (a protected structure), 43 (a protected structure), 44 (a protected structure), 45-51, 52-54 (protected structures), 55-56, 57 (a protected structure), 58 (a protected structure), 59, 60 (a protected structure) and 61 (a protected structure) and 60a (otherwise 5 Henry Place) O'Connell Street Upper, Nos 37-41a Henry Street, nos 1-13, 14-17 (protected structures and a national monument) and 18-25 Moore Street, nos 71 and 71a Parnell Street, nos 1-8 O'Rahilly Parade, nos 1-15 Moore Lane, Nos 4-13 (including 3 Moore Lane) and 15-18 Henry	Grant Permission on appeal per PL29N.232347: 24/03/2010

Planning Ref.	Description	Decision Date
	Place, nos 6-8 at the junction of Henry Place and Moore Lane and including Clarkes Court off Moore Street, Moore Place off Henry Place, Murphys Court off Moore Lane, part of Moore Lane from the junction of Henry Place and Moore Lane to the junction of Moore Lane and O'Rahilly Parade and part of Henry Place from the junction of Moore Street and Henry Place to the rear of no. 61 O'Connell Street Upper (a protected structure), Dublin 1. The site consists of the majority of a city block bounded by Parnell Street, Moore Lane, O'Rahilly Parade, Moore Street, Henry Street, Henry Place and O'Connell Street Upper, but for the avoidance of doubt excludes nos 70 & 72-75 Parnell St, Nos 37-39 & 62-69 O'Connell St Upper, Nos 31-36 Henry St & Nos 1-3 Henry Place, Dublin 1. Note: permission granted for demolition of 17-18 Henry Place under Reg. Ref: 2479/08.	
2479/08X1	As above – Extension of Duration of Planning Permission granted per PL29N.232347.	Extension of Duration granted: 21/07/2016
3927/09	For a change of use planning permission to existing structures with retail/commercial uses. The proposed planning permission will convert the existing structure to a restaurant/cafe. The development will consist of the refurbishment of no: 10, 11 & 12 Moore Street, Dublin 1 into three separate restaurants and part retail stores in No. 10. The gross floor area shall be 359 sqm which will accommodate a cafe/restaurant area with kitchen and storage.	Grant Permission: 05/01/2010
2862/21	PROTECTED STRUCTURE: Dublin Central GP Limited intends to apply for Permission for a period of 7 years at a site, 'Dublin Central - Site 4', (c. 0.3 Ha) 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. Also, the site includes the rear of Nos. 50 - 51 and Nos. 52 - 54 Upper O'Connell Street, No. 13 Moore Lane, No. 14 Moore Lane (otherwise known as Nos. 1 - 3 O'Rahilly Parade and Nos. 14 - 15 Moore Lane or Nos. 1 - 8 O'Rahilly Parade and Nos. 14 - 15 Moore Lane), Dublin 1 and otherwise generally bounded by No. 22 Moore Street and No. 13 Moore Lane to the north, Moore Lane to the east, Moore Street to the west and Henry Place to the south. Nos. 14 - 17 Moore Street (National Monument / Protected Structures) is bounded north and south by the proposed development. The proposed development comprises a mixed-use scheme (c. 3,290 sq. m gross floor area) in 2no. parts located north and south of the Nos. 14 - 17 Moore Street (a National Monument / Protected Structures) ranging in height from 1 - 3 storeys including retained independent single storey basements comprising 15no. apartment units (c. 1,454 sq. m gfa), café / restaurant use (c. 864 sq. m gfa), retail use (c. 617 sq. m gfa), cultural use (c. 60 sq. m gfa) and office use (c. 295 sq. m gfa). The proposed development to the north of Nos. 14 - 17 Moore Street consists of: - Nos. 20 - 21 Moore Street are refurbished and adapted to provide 1no. café / restaurant / licenced premises with takeaway / collection facility (c. 80 sq. m in total) at ground floor addressing both Moore Street and proposed new public plaza to the rear and 1no. 1-bed apartment and 1no. 2 bed apartment located at 1st and 2nd floor level - 4no. in total (cycle and bin storage at ground floor level). No terraces or balconies are proposed to the residential units; Provision of a new 2 storey extension at the side of No. 17 Moore Street (National Monument / Protected Structure) to act as an extension for ancillary use to the National Monument - a cultural facility (c. 60 sq. m gfa); Provision of an archway between the gable of No. 20 Moore Street and the new 2 storey	Decision to Grant Permission 12/01/2022; now on appeal to An Bord Pleanála

Planning Ref.	Description	Decision Date
	<p>extension to No. 17 Moore Street (National Monument / Protected Structure) to form an entrance to a new public plaza off Moore Street; Provision of a 2 storey building with profiled roof consisting 1no. licenced restaurant / café unit with takeaway / collection facility (c. 250 sq. m gfa) etc.</p> <p>Note: The proposed development includes the retention of the ground floor façade of Nos. 17 - 18 Henry Place (also known as Nos. 4 - 5 Moore Lane), with internal and external modifications, as per the decision of the City Council to grant permission. The decision is on appeal to An Bord Pleanála.</p>	

Recent Enforcement History:

None.

Description:

This description is based on an internal and external inspection by the Conservation Section on the 5th August 2021, consideration of available research and documentation, together with the architectural heritage documents submitted as part of planning application Reg. Ref: 2862/21.

Exterior:

17/18 Henry Place is an attached corner-sited single-storey warehouse building built c. 1905 having three-bay elevation to Henry Place and four-bay elevation to Moore Lane (Figs. 3 & 4). Formerly with upper floor, which survives to first floor cill level. Replacement flat roof of corrugated-iron. Painted brick walls, laid in English garden wall bond with projecting brick plinth course and moulded brick string course to first floor cill level to elevation to Henry Place. Exposed yellow brick to upper section of wall to Moore Lane (Fig. 5). Infilled segmental-headed window openings with painted masonry sills and painted brick voussoirs to ground floor, granite cills surviving to remaining section of first floor wall. Infilled segmental-headed door opening with painted brick voussoirs to Moore Lane. Segmental-headed carriage-arch to Henry Place having painted brick voussoirs and moulded keystone, now enlarged with inserted square-headed opening having roller shutter and steel lintel. Similar in architectural design to No. 11-13 Henry Place opposite.

Interior:

Walls constructed of yellow, brown and red brick, laid in English garden wall bond with remnants of lime plaster (Figs. 5 & 6). Exposed timber rafters and transverse iron I-beams supporting modern flat roof. Concrete floor. Blocked openings to east and south elevations. Blocked two-over-two timber sash windows to north elevation. Extension to rear of No. 11 Moore Street extends in north-west corner of interior.

Historical Background:

In the mid-nineteenth century the buildings now forming 17/18 Henry Place comprised a pair of residential properties, then named No. 16 and 17 Off Lane, with a further two structures occupying the northern portion of the site, No. 4 and 5 Moore Lane (Fig. 7). To the north was a narrow lane providing access to the rear plots of these structures and properties at No. 10 and 11 Moore Street. These lanes and courtyards characterised the area up to the late nineteenth and early twentieth centuries, but many have since been built over.

The Ordnance Survey map of 1891 indicates the rear site of No. 11 Moore Street was developed to encompass the majority of the small lane that ran along the north end of the site (Fig. 8). Goad's Insurance Plan of 1893 indicates a pair of four-storey buildings at 17-18 Henry Place which were interconnected internally (Fig. 9). The condition of these buildings on the site declined in the late nineteenth century leading to their replacement. The new building which encompassed the plots of both 17 and 18 Henry Place and also those of 4 and 5 Moore Lane, was constructed as a storehouse

for O'Brien & Co. in the early twentieth century. O'Brien's was a mineral water company that maintained a manufacturing plant and bottling factory further to the east at 4-8 Henry Place.

1916 Historical Association

Henry Place and Moore Lane are key thoroughfares associated with the 1916 Rising and featured significantly in witness statements from the time and other contemporary documentation. Detachments of Irish Volunteers left the GPO by means of its side entrance on the south side of Henry Street. The first detachment, under the command of the O'Rahilly moved west along Henry Street before turning north into Moore Street. Subsequent groups crossed over to Henry Place, the south end of which lay almost opposite the side entrance of the GPO on Henry Street. They travelled the length of Henry Place to secure 10 Moore Street as an alternative location for the garrison. Specific geographic locations such as the sharp left turn on Henry Place and the structures along it including 17/18 are mentioned frequently in witness statements. The position of 17/18 Henry Place, at the junction with Moore Lane is particularly significant. The Volunteers had to avoid machine-gun and sniper fire from crown forces on the roof of the Rotunda Hospital and from a barricade at the northern end of Moore Lane while crossing this junction. Witness statements such as that of Liam Tannam (WS 242 Liam Tannam) describes the danger *'when we showed up opposite Moore Lane we came under fire....We stooped and ran across...'*

The witness statement of Captain R. Henderson (WS 1686 R. Henderson) also highlights the danger at this location *'The main body had now retreated from the doomed GPO.....As the front ranks were crossing Moore Lane (which runs at right angles from Henry Place) intense machine-gun fire opened from the roof of the Rotunda Hospital. Crouching they escaped; those behind them came to a halt'*.

Frank Henderson records his occupation of the building in his witness statement *'There was great confusion in Henry Place.....I established my party in a bottling stores at the corner of the lane which runs parallel to O'Connell Street and Moore Street as far as the Rotunda Hospital (WS 249 F. Henderson)*. Henderson left the bottling stores for No. 10 Moore Street to look for food and hot drinks for his party. While there he collapsed and remained at No. 10 till the following morning. Henderson then *'went out into Henry Place and found that the rear guard party had been withdrawn from the stores' they had occupied the previous night'* (WS 249 F. Henderson, p. 56). The O'Brien & Co. Bottling Stores at 17/18 Henry Place, constructed in the early twentieth century, provided the backdrop for these events.

The impact of the Rising on the Bottling Store is recorded in a claim by Michael Francis O'Brien, proprietor of O'Brien & Co. The company owned a number of properties on Henry Place including their factory, stores, and stables. The company sought damages of nearly £450 and received a payment of just over £400 from the Property Losses (Ireland) Committee indicating the amount of damage done. 17/18 Henry Place is named as the 'New Store' in his claim, reflecting its construction in the early twentieth century. The value of the claim for damage to the building (including repairs to front and rear windows, front door and tiled roof) and contents is over €50.

Post 1916

Goad's Insurance Plan of 1926 names the structure as 'O'Brien's & Co. Empties Store'. The premises was later occupied by Southall (Ireland) Ltd., and then by Goodall's of Ireland Ltd. Goad's Insurance Plan of 1961 records the structure as a two-storey drapery warehouse with cast-iron columns and iron girders over a brick-arched basement (Fig. 10).

Photographs of 17/18 Henry Place taken before the removal of the first floor indicated that the eastern elevation and western party wall to No. 16 were constructed of yellow brick while the front (south) elevation was constructed of red brick, with red brick quoins to the southeast corner

The structure was damaged by fire in the 1980s which destroyed the roof and first floor interior. Later around 2010, the remaining first floor brickwork facades were taken down to cill level by the owner

under 'making safe works', as the loose brickwork walls and derelict premises were deemed a potential danger to the general public.

References:

- Ask About Ireland 2021. Griffith's Primary Valuation of Rateable Tenements. Available at [Griffith's Valuation \(askaboutireland.ie\)](http://askaboutireland.ie).
- Casey, C. 2005. The Buildings of Ireland: Dublin.
- DHLGH, 2011, *Architectural Heritage Protection Guidelines for Planning Authorities*.
- Goad, C. E. 1893. Insurance Plan of the City of Dublin, 1893.
- Goad, C. E. 1961. Insurance Plan of the City of Dublin, revised 1961.
- Military Archives 2021. Witness Statements of Captain R. Henderson (WS 1686), Frank Henderson (WS 249), Liam Tannam (WS 242)
- National Archives 2021. Property Losses (Ireland) Committee – Michael O'Brien. Available at http://centenaries.nationalarchives.ie/reels/plic/PLIC_1_3648.pdf
- Ordnance Survey 1847. Dublin Sheet 14.
- Ordnance Survey 1891. Dublin OS sheet XVIII.47.
- Library Ireland 2021. Thom's Almanac and Official Directory for the Year 1862.
- Shaffrey Associates Architects & Franc Myles, Archaeology & Built Heritage (06 February 2012). *Application for Ministerial Consent to carry out Works at 14 – 17 Moore Street, Dublin 1, a National Monument*. Unpublished Report submitted to Department of Arts, Heritage and Gaeltacht in response to a Request for Additional Information. * Note this report includes the Battlefield Archaeological Assessment for Moore Street & Environs by Franc Myles.

NIAH Record:

The NIAH uses eight categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, technical & social) and identifies five categories of rating in seeking to rank buildings. The NIAH rating values are International, National, Regional, Local and Record Only (I, N, R, L, O). Structures which are considered of International, National, and Regional significance are deemed worthy of inclusion on the RPS.

The National Inventory of Architectural Heritage (NIAH) has been carried out for this area. However, 17/18 Henry Place, Dublin 1, was not recorded.

Assessment of Special Interest under the Planning and Development Act 2000:

The Conservation Section considers 17/18 Henry Place, Dublin 1, to be of historical, cultural and social interest, as follows:

HISTORICAL

The association of this building with the well-documented events of 1916, including the evacuation of the GPO and its occupation by a group of Volunteers led by Frank Henderson, is of historical significance. The Architectural Heritage Protection Guidelines for Planning Authorities (2011) state that the '*...level of importance of the historical connection and its relationship to the existing fabric of the structure should be assessed.*' (2011, p. 25).

The location is associated with a nationally significant event and '*retains its significance regardless of subsequent alteration*' (DOHLGH 2011, p. 25). While the structure has been significantly altered following its damage by fire and later removal of its first floor, the surviving ground floor of the building would have borne witness to the events of the Rising and provides a tangible link to that conflict.

CULTURAL

The structure's link to the 1916 Rising and the references to it in witness statements from the Volunteers involved, has acquired cultural significance in the intervening century. The Architectural Heritage Protection Guidelines for Planning Authorities state that special interest can be assigned to '*...more modest works of the past that have acquired cultural significance with the passing of time*' (2011, 28). The 1916 Rising was a seminal event in Irish history that has understandably taken on

cultural importance, including surviving elements of our architectural heritage that played a role in the events of that week.

SOCIAL

The former bottling store building featured specifically in the retreat of Volunteers from the GPO during the last few days of the 1916 Rising. The Architectural Heritage Protection Guidelines for Planning Authorities state that *'the characteristic of special social interest embraces those qualities for which a structure, a complex or an area has become a focus of ... political, symbolic or other sentiment to any group of people. A community may have an attachment to a place because it is an essential reference point for that community's identity, whether as a meeting place or a place of tradition, ritual or ceremony...'* (2011, 30). The 1916 Easter Rising was a defining moment in Ireland's struggle for independence.

The external, ground floor facades of 17/18 Henry Place, Dublin 1, would be considered of 'Regional' significance, on the basis of the NIAH significance/ratings above.

Conclusion:

The Conservation Section considers that 17/18 Henry Place, Dublin 1, merits inclusion on the Record of Protected Structures on the basis of its historical, cultural and social significance. However, given the loss of historic fabric over the intervening period since the Rising, the Conservation Section concludes that the proposed protection should be limited to the external, ground floor façades of 17/18 Henry Place, fronting onto the laneways at Henry Place and Moore Lane.

The extent of the proposed Protected Structure status and curtilage is outlined in Fig. 2 of this document (below).

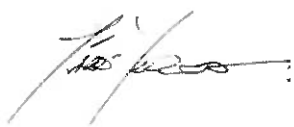
It is now proposed to initiate the statutory process for the proposed addition of this structure to the Record of Protected Structures. This includes undertaking a statutory public consultation process in accordance with Section 55 of the Act. Following the statutory consultation process, a further report will be prepared taking any submissions and observations received into consideration, with a recommendation to the City Council to proceed or not with the proposed addition, or with a recommendation including amendments to the proposed addition.

Recommendation:

It is recommended that the statutory process to initiate the proposed addition of the ground floor façades to Henry Place and Moore Lane of 17/18 Henry Place, Dublin 1, to the Record of Protected Structures, in accordance with Sections 54 and 55 of the Planning and Development Act, 2000 (as amended), be noted.

Recommendation	
Address	Description (to appear on RPS)
17/18 Henry Place, Dublin 1	Commercial Premises (former Bottling Stores) ground floor façades to Henry Place and Moore Lane

The initiation of the statutory addition process was noted by the Central Area Committee of Dublin City Council at its monthly meeting held on 12th April 2022.

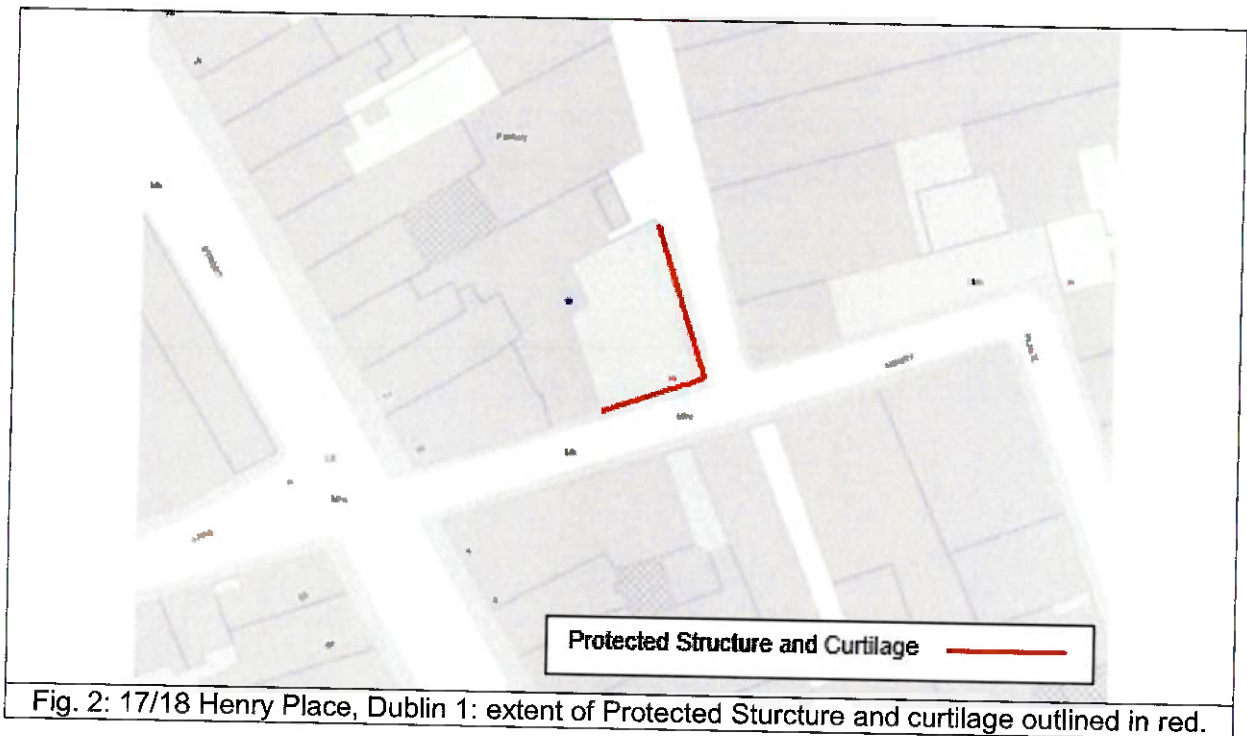


Paraic Fallon
Senior Planner, Conservation Section
Planning & Property Development Department

29/06/2022

Date

Extent of Protected Structure Status



Photographs



Fig. 3: 17/18 Henry Place, front (south) elevation.



Fig. 4: 17/18 Henry Place, east elevation to Moore Lane.



Fig. 5: 17/18 Henry Place, upper section of western party wall to 16 Henry Place.



Fig. 6: 17/18 Henry Place, view of interior

Historic Maps



Fig. 7: Dublin OS Sheet 14, 1847



Fig. 8: Dublin OS sheet XVIII.47, 1891



Fig. 9: Charles Goad, Insurance Plan of the City of Dublin, 1893

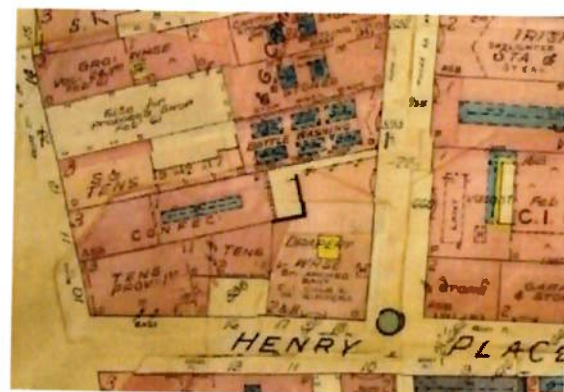


Fig. 10: Charles Goad, Insurance Plan of the City of Dublin, revised 1961

Response to
Section 137
Request (ABP
Ref. 312642-
22)

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

JANUARY 2024

Document Control: -

Author	Checked by	Purpose	Date
NOC	SL	Final	11.01.2024

TABLE OF CONTENTS

1	INTRODUCTION	1
2	DUBLIN CITY COUNCIL DEVELOPMENT PLAN 2022 – 2028	1
2.1	CHAPTER 4 – SHAPE AND STRUCTURE OF THE CITY	2
2.1.1	Applicant's Response	4
2.2	CHAPTER 5 – QUALITY HOUSING AND SUSTAINABLE NEIGHBOURHOODS	6
2.2.1	Applicant's Response	9
2.3	CHAPTER 6 – CITY ECONOMY AND ENTERPRISE.....	10
2.3.1	Applicant's Response	12
2.4	CHAPTER 7 – THE CITY CENTRE, URBAN VILLAGES AND RETAIL.....	14
2.4.1	Applicant's Response	18
2.5	CHAPTER 8 – SUSTAINABLE MOVEMENT & TRANSPORT	20
2.5.1	Applicant's Response	22
2.6	CHAPTER 11 – BUILT HERITAGE AND ARCHAEOLOGY	23
2.6.1	Applicant's Response	28
2.7	CHAPTER 12 – CULTURE.....	33
2.8	CHAPTER 13 – STRATEGIC DEVELOPMENT REGENERATION AREA	37
2.8.1	Applicant's Response	39
2.9	CHAPTER 15 – DEVELOPMENT STANDARDS.....	41
2.9.1	Section 15.4.1 - Healthy Place Making.....	41
2.9.2	Section 15.4.2 Architectural Design Quality	41
2.9.3	Section 15.4.3 Sustainable and Climate Action	42
2.9.4	Section 15.4.4 Inclusivity and Accessibility	42
2.9.5	Section 15.5.1 Brownfield, Regeneration Sites and Large Scale Development.....	43
2.9.6	Section 15.5.4 Height	43
2.9.7	Section 15.5.5 Density.....	45
2.9.8	Section 15.5.6 Plot Ratio and Site Coverage	46
2.9.9	Section 15.5.8 Architectural Design Statement	46
2.9.10	Section 15.5.9 Models and Photomontages	46
2.9.11	Section 15.6 Green Infrastructure and Landscaping	46
2.9.12	Section 15.7.3 Climate Action and Energy Statement	47
2.9.13	Section 15.17.5 Shopfront and Façade Design	47
2.9.14	Car Parking Standards	48
2.9.15	Bike Parking Standards.....	48
2.9.16	Applicant's response	48
3	CONCLUSION	58

1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 submit this response to a Section 137 request to An Bord Pleanála. It is made on behalf of the Applicant, Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576.

The content of this Report responds to a letter from An Bord Pleanála, dated 13 December 2023, inviting the Applicant to make comments on matters of relevance to the proposed development by reference to changes and/or any wider provisions of the Dublin City Development Plan 2022-2028, that came into force since the lodgement of the appeal now before the Bord under ABP Ref.312642-22 and that may have relevance to the proposed development.

Our client welcomes the opportunity afforded by the Bord to set out how the development proposed in this case is consistent with the relevant provisions of the Dublin City Development Plan 2022-2028.

A Masterplan for the entire Dublin Central site was prepared to provide the Planning Authority, prescribed bodies and the general public, with an clear indication of the wider proposals for the area and this accompanied the planning application in this case. The Site 4 development forms part of that overall Masterplan. The Masterplan is underpinned by the Dublin Central Masterplan Area Conservation Management Plan, prepared by Molloy & Associates Conservation Architects. As such, while separate planning applications have been made for individual sites within the Masterplan area, there is an obvious relationship between the sites. An architectural model was submitted to Dublin City Council, providing further information on the Site 4 proposal in the context of the Dublin Central Masterplan.

The Bord will have access to the public planning file in this case. To avoid duplication, this Response cross references to the relevant material already provided in the planning application file where necessary and appropriate, rather than repeating it.

2 DUBLIN CITY COUNCIL DEVELOPMENT PLAN 2022 – 2028

As noted by the Bord, since the lodgement of the Site 4 appeal, a new Dublin City Development Plan has come in to effect. The current Dublin City Development Plan 2022-2028 came in to effect on 14th December 2022. The following report provides a high level overview of how the scheme complies with provisions of the Chapters of the Dublin City Development Plan 2022-2028 identified by the Bord in their letter dated 13 December 2023. The response to each chapter/policy is outlined below, where we have identified those new policy objectives that are of most relevance. The Bord will of course, be undertaking their own review of the Development Plan provisions as part of this exercise and we trust the following is of assistance to the Bord in that regard.

The approach taken below is to identify the range of policy objectives of most relevance under each Chapter identified by the Bord and to provide a response to these below. We have sought to assist the Bord further by referencing material addressing some of the matters raised that formed part of the planning application determined by Dublin City Council. In that regard, whilst we will be referring to material submitted with the planning application in that context, the Bord will of course be aware that in addition to material lodged with the planning application itself, there was also an extensive submission of Further Information in response to a request from the Planning Authority for same. We trust the Bord will have regard to both sets of material.

In addition, the Applicant's Response in this submission relate both to the Site 4 proposals themselves and to the Dublin Central Masterplan as a whole also, as appropriate.

2.1 Chapter 4 – Shape and Structure of the City

Policy SC1: Consolidation of the Inner City

To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.

Policy SC2: City's Character

To develop the city's character by:

- *Cherishing and enhancing Dublin's renowned streets, civic spaces and squares;*
- *Developing a sustainable network of safe, clean, attractive streets, pedestrian routes and large pedestrian zones lanes and cycleways in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise;*
- *Protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city;*
- *Revitalising the north and south Georgian squares and their environs and realising their residential potential;*
- *Upgrading Dame Street/College Green as part of the Grand Civic Spine;*
- *Promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city.*

Policy SC3: Mixed Use Development

To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development, and facilitating the conversion of both old office buildings and over shop spaces to residential.

Policy: SC4 Recreational and Cultural Events

To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the development of new and the retention and enhancement of existing civic and cultural spaces.

Policy SC5: Urban Design and Architectural Principles

To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.

Policy SC10: Urban density

To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.

Policy SC11: Compact Growth

In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.*

Policy SC12: Housing Mix

To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.

Policy SC14: Building Height Strategy

To ensure a strategic approach to building height in the city that accords with the Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4

Policy SC15: Building Height Uses

To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.

Policy SC16: Building Height Locations

To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area

Policy SC17: Building height

To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:

- *follow a design led approach;*
- *include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);*
- *make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;*
- *deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;*
- *Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and*

- have regard to the performance-based criteria set out in Appendix 3.

All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.

Policy SC19: High Quality Architecture

To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.

Policy SC20: Urban Design

Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).

Policy SC21: Architectural Design

To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.

Policy SC22: Historical Architectural Character

To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.

2.1.1 Applicant's Response

Regeneration

The Dublin Central Masterplan is a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape and creates new points of interest in the area.

The Applicant has appointed a world class design team, led by ACME Architects as Masterplan Architect, to help realise its vision for the redevelopment and regeneration of this key city centre site.

The site of the Masterplan accommodates a disparate collection of single to eight storey buildings of varied vintage and quality. The area is characterised by a mix of uses including retail, financial services, office, food and beverage services. It is also characterised by a number of unoccupied or underutilised buildings, plots, car parking and storage depots, service lanes and back lane workshops. Some of the buildings are afforded a level of legal heritage protection (particularly along O'Connell Street) and many others are not. There is significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment and adaptive reuse, and in turn to stimulate the regeneration of the surrounding areas including the cultural quarter at Parnell Square.

The conservation approach in Site 4 seeks to ensure that 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 premier shopping streets. It seeks to strike an appropriate balance between the conservation of a representative collection of 19th and 20th century buildings and the provision of high quality retail, residential, café / restaurant and cultural floor space that will drive the regeneration and active use of this significant city centre location. The general appearance, the historic uses and associations are largely maintained, particularly along Henry Street and Moore Street.

Site 4 is consistent with the national policy objectives of the NPF in achieving sustainable mixed-use development (including residential, retail, café / restaurant, hotel and cultural uses) appropriate to the regeneration and rejuvenation of this city block at the junction of Henry Street and Moore Street, and the wider Masterplan, in the heart of Dublin City Centre.

We refer the Bord also to Section 2.8 of this response which addresses regeneration in the context of the Strategic Development and Regeneration Area in detail.

Compact Growth

Site 4 is an appropriate redevelopment of a highly accessible, underutilised, brownfield city centre site for a mix of uses including retail, food and beverage, cultural and residential uses that also has regard to its heritage setting and significance.

The proposed mix of uses is consistent with strategic planning policy at national, regional and local level that promotes the consolidated compact growth of employment opportunities and housing at well connected, integrated city centre locations.

We refer the Bord to Section 2.9 of this report below for discussion on how the scheme and the Masterplan has had regard to the criteria set out in Chapter 15 – Development Standards.

Increased Height

Site 4 consists of building heights ranging from 1 to 3 storeys in height which is consistent with the prevailing heights in the immediate surrounding area and does not require an evaluation of criteria set out in Appendix 3 of the City Development Plan for enhanced building height as a result. Site 4 also includes for the retention and re-use of an extensive amount of existing buildings and fabric. As the site is larger than 0.5ha a masterplan has been prepared for the entire Dublin Central area, hereby referred to as the Dublin Central Masterplan.

Appendix 3 – Achieving Sustainable Compact Growth of the Development Plan identifies the North East Inner City (NEIC) SDRA as being “*particularly appropriate for higher buildings and density*”. The application site is located within the NEIC SDRA, furthermore, the Dublin Central lands are identified as a ‘Key Opportunity Site’ within that SDRA. The Site 4 location is also constrained in terms of the height achievable by virtue of its proximity to a national monument (Nos. 14-17 Moore Street) and to the historic fabric that exists within the site also).

We refer the Bord to the following assessments enclosed with the application which demonstrate how the development will assimilate appropriately with the existing urban context:

- Chapter 12 of the EIAR - Landscape and visual impact assessment, prepared by ARC.
- Photomontages enclosed in the EIAR, prepared by ARC.

High Quality Architecture

It is an ambition of the Dublin Central Masterplan to deliver a world class city quarter that sits respectfully within its context, utilising its location and heritage features. The Dublin Central Masterplan, including Site 4, incorporates high quality, contemporary design whilst also acknowledging the need to incorporate the quality historical elements.

The overall design of Dublin Central takes in to consideration the existing context and the scale and pattern of the existing streets, and it respects and enhances the areas architectural assets whilst creating a number of new landmark features.

We refer the Bord to the Design Statement for Site 4 prepared by ACME as part of the application which details the overall design principals for Site 4.

The development also promotes the guidance set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (DMURS). We refer the Bord to the

Architect's Design Statement, prepared by ACME Architects as submitted as part of the application, for a detailed discussion of each of the 12 design criteria as well as the Engineering Documents prepared by Waterman Moylan Engineering Consultants which detail how the scheme is compliant with DMURS.

2.2 Chapter 5 – Quality Housing and Sustainable Neighbourhoods

Policy QHSN1: National and Regional Policy

To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.

Policy QHSN2: National Guidelines

To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019), the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.

Policy QHSN3: Housing Strategy and HNDA

- (i) *To secure the implementation of the Dublin City Council Housing Strategy (Appendix 1) in accordance with the provision of national legislation.*
- (ii) *(ii) To encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the city in accordance with the provisions of the Housing Need Demand Assessment and any future Regional HNDA.*

Policy QHSN4: Key Regeneration Areas

To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods and promote area regeneration in parts of the city which require physical improvement and enhancement in terms of quality of life, housing and employment opportunities and to ensure a balanced community is provided in regeneration areas.

Policy QHSN6: Urban Consolidation

To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.

Policy QHSN7: Upper Floors

To resist and where the opportunity arises, to reverse the loss of residential use on upper floors and actively support proposals that retain or bring upper floors into residential use in order to revitalise the social and physical fabric of the city through measures such as the Living City Initiative.

Dublin City Council will actively engage with property owners and other stakeholders at a national level to investigate other alternative measures in addition to the Living City Initiative to expedite bringing upper floors into residential use, and will be actioned by the City Recovery Task Force and its successor.

Policy QHSN8: Reduction of Vacancy

To promote measures to reduce vacancy and underuse of existing building stock and to support the refurbishment and retrofitting of existing buildings, including Dublin City Council's Estate Renewal Programme.

Policy QHSN9: Active Land Management

To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.

Policy QHSN10: Urban Density

To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

Objective QHSN06: Upper Floor Building Design

To draft additional upper floor building re-design guidelines that are sufficiently innovative and flexible to promote the residential use of vacant upper floors.

Policy QHSN11: 15 Minute City

To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.

Policy QHSN12: Neighbourhood Development

To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:

- build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;*
- integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city;*
- encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance;*
- promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.*

- *promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;*
- *promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;*
- *cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;*
- *provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;*
- *have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'*
- *are designed to promote safety and security and avoid anti-social behaviour.*

Policy QHSN14: High Quality Living Environment

To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs

Policy QHSN16: Accessible Built Environment

To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.

Policy QHSN17: Sustainable Neighbourhoods

To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.

Policy QHSN18: Needs of an Ageing Population

To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2019.

Policy QHSN22 Adaptable and Flexible Housing

To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.

Policy QHSN34: Social, Affordable Purchase and Cost Rental Housing

To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the

Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.

Policy QHSN35: Diversity of Housing Type and Tenure

To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.

2.2.1 Applicant's Response

Site 4 provides 15 no. apartments predominantly located in the upper floors of existing buildings. The proposed development is one of two Sites within the larger Dublin Central Masterplan area that combined will deliver 94 new homes in this inner city location.

The block located to the south of the National Monument (Nos. 14-17 Moore Street) is designed as a single residential community consisting of 11 no. apartments centred around a communal courtyard, situated over a level of small retail units facing Moore Street and Moore Lane. The communal courtyard serves as communal open space for the future residents. The proposed units are also accessed off of this courtyard. The remaining 4 no. apartments are located to the north of the National Monument at Nos. 20 and 21 Moore Street on the upper floors. These 4 no. apartments do not have any private/communal open space as they are in existing buildings which did not originally have balconies. It is considered the addition of balconies would not be in keeping with the architectural heritage of the historically sensitive area. These buildings are located on the proposed public square and it is considered this will provide future residents with an adequate level of amenity space.

The proposed residential element will meet the needs of a range of prospective tenants seeking accommodation in the city centre. It will add a vibrant new residential community to the revitalised urban quarter envisaged by the Dublin Central Masterplan. The Planning Officers Report from Dublin City Council welcomes the proposed residential component at Site 4.

The proposed development accommodates 15 no. residential units, 4 no. situated in the block to the north of the National Monuments, 11 no. situated in the block to the south of the National Monument. The 4 no. units located to the north of the National Monument are accessed via Moore Street. The 11 no. units situated to the south of the National Monument are accessed via a communal courtyard accessed from Henry Place.

The 1-bedroom units range in size from 48 sq. m to 63 sq. m and the 2-bedroom (3-person and 4-person) units range in size from 73 sq. m to 80 sq. m. The overall gross floor area of residential accommodation proposed amounts to 1,454 sq. m.

Type	No. of Units	%
1-Bed	9	60%
2-Bed (3P)	3	20%
2-Bed (4P)	3	20%
Total	15	100%

The planning application was accompanied by Housing Quality Assessment (HQA), prepared by ACME Architects and was amended at Further Information stage. The HQA demonstrates how each residential apartment units complies with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (Revised 2023). We note that the 2023 update to the Guidelines does not alter the design standards as it relates to the units proposed.

In relation to regeneration overall, we refer the Bord to Section 2.8 of this response which addresses regeneration in detail.

The Dublin Central masterplan is a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape and creates new points of interest in the area.

The Applicant has appointed a world class design team, led by ACME Architects as Masterplan Architect, to help realise its vision for the redevelopment and regeneration of this key city centre site.

This conservation approach seeks to ensure that 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 premier shopping streets. It seeks to strike an appropriate balance between the conservation of a representative collection of 19th and 20th century buildings and the provision of high quality retail, residential, hotel, café / restaurant and cultural floor space that will drive the regeneration and active use of this significant city centre location. The general appearance, the historic uses and associations are largely maintained, particularly along Henry Street and Moore Street.

The Dublin Central 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.

The Dublin Central Masterplan promotes the concept of a 15 minute city through providing a liveable sustainable neighbourhood which delivers healthy place making, quality housing and well designed, integrated, safe, accessible inclusive public spaces served by a range of local services, amenities and sustainable transport options.

2.3 Chapter 6 – City Economy and Enterprise

Policy CEE1: Dublin's Role as the National Economic Engine

- (i) *To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator.*
- (ii) *To promote and facilitate Dublin as a creative and innovative city that is globally competitive, internationally linked, attractive and open.*
- (iii) *To promote an internationalisation strategy building mutually-beneficial economic and other links with key cities globally to encourage investment and tourism in Dublin.*

Policy CEE2: Positive Approach to the Economic Impact of Applications

To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes.

Policy CEE7: Strategic and Targeted Employment Growth

To promote strategic and targeted growth of strategic development areas and corridors in accordance with the RSES and MASP with a focus on the city centre, the Docklands, the Outer City and Key Urban Villages and Neighbourhood Centres/Urban Villages.

Policy CEE8: The City Centre

To support the development a vibrant mix of office, retail, tourism related and cultural activities in the city centre and to facilitate the regeneration and development of key potential growth areas such as the

Diageo lands, the St. James's Healthcare Campus and Environs and the TU Dublin campus at Grangegorman.

Policy CEE12: Transition to a Low Carbon, Climate Resilient City Economy

To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.

Policy CEE13: Towards a Green and Circular Economy

To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.

Policy CEE14: Quality of Place

To recognise that 'quality of place', 'clean, green and safe', is crucial to the economic success of the city, in attracting foreign and domestic investment, and in attracting and retaining key scarce talent, residents and tourists.

Policy CEE19: Regeneration Areas

To promote and facilitate the transformation of Strategic Development and Regeneration Areas (SDRAs) in the city, as a key policy priority and opportunity to improve the attractiveness and competitiveness of the city, including by promoting high-quality private and public investment and by seeking European Union funding to support regeneration initiatives, for the benefit of residents, employees and visitors.

Policy CEE28: Visitor Accommodation

To consider applications for additional hotel, tourist hostel and aparthotel development having regard to:

- *the existing character of the area in which the development is proposed including local amenities and facilities;*
- *the existing and proposed mix of uses (including existing levels of visitor accommodation i.e. existing and permitted hotel, aparthotel, Bed and Breakfast, short-term letting and student accommodation uses) in the vicinity of any proposed development;*
- *the existing and proposed type of existing visitor accommodation i.e. Hotel Classification/Rating, Hostel Accommodation, Family Accommodation, Alternative Accommodation etc., in the vicinity of any proposed development;*
- *the impact of additional visitor accommodation on the wider objective to provide a rich and vibrant range of uses in the city centre including residential, social, cultural and economic functions;*
- *the need to prevent an unacceptable intensification of activity, particularly in predominantly residential areas;*
- *the opportunity presented to provide high quality, designed for purpose spaces that can generate activity at street level and accommodate evening and night-time activities – see also Chapter 12, Objective CUO38.*

2.3.1 Applicant's Response

Dublin City is regarded as an internationally competitive capital and the Development Plan aims to safeguard and enhance the said role as well as to: -

- *Promote strategic and targeted employment growth.*
- *Support regeneration and tackle vacancy.*
- *Support the creation of high quality urban spaces and the transition to a low-carbon, green, circular economy.*
- *Support key economic sectors.*
- *Foster local economic development and social enterprise.*

Site 4 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.

This area currently accommodates a range of existing buildings of varied form, quality and architectural and cultural heritage significance, which have accommodated a variety of uses as the development of the City evolved over time. There have been different periods of grandeur and vibrancy, destruction and replacement, boom and bust that have affected the character of this part of the city.

The Dublin Central area has in the more recent past experienced significant under-utilisation and decline. Notwithstanding that O'Connell Street is one of Ireland's premier thoroughfares and Henry Street is one of our busiest shopping streets, not all of the buildings or individual plots located within the adjacent project area are currently occupied or developed in a manner that is reflective of this context.

There is, however, 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. It seeks to create a world class City Quarter, with a vibrant mix of uses, in new and historic buildings that sit respectfully within the existing open street structure. It recognises the status of O'Connell Street as one of Ireland's most important civic thoroughfares and the potential of the area to attract and engage visiting, working and residential communities.

The 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. It envisages a mix of uses that will drive activity and vibrancy through the day and evening. It sets down the design principles for the integration of an ordered variety of new and historic buildings and a well-designed public realm, informed by the historic street structure and past events in this area. We refer to the Masterplan, prepared by ACME Architects and Gross Max Landscape Architects, that accompanies the application for further discussion of the urban regeneration and design principles that inform the development for each of the identified 'Sites'.

The role of retail in the City Centre is vital in driving the competitiveness of the City at an international level, in line with the Core Strategy of the Development Plan.

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. This area currently accommodates a range of buildings of varied form, quality and architectural and cultural heritage significance, which have accommodated a variety of uses as the development of the City evolved over time. There have been different periods of grandeur and vibrancy, destruction and replacement, boom and bust that have affected the character of this part of the city. The Dublin Central area has in the more recent past experienced significant under-utilisation and decline. Notwithstanding that O'Connell Street is one of Ireland's premier thoroughfares and Henry Street is one of our busiest shopping streets, not all of the

buildings or individual plots located within the adjacent project area are currently occupied or developed in a manner that is reflective of this context.

There is, however, 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 Dublin Central Masterplan seeks to inject new life through the sustainable regeneration and revitalisation of this area at the heart of Dublin city centre. It seeks to create a world class City Quarter, with a vibrant mix of uses, in new and historic buildings that sit respectfully within the existing open street structure, recognising the status of O'Connell Street as one of Ireland's most important civic thoroughfares and the potential of the area to attract and engage visiting, working and residential communities.

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. It envisages a mix of uses that will drive activity and vibrancy through the day and evening. It sets down the design principles for the integration of an ordered variety of new and historic buildings and a well-designed public realm, informed by the historic street structure and past events in this area. We refer to the Dublin Central Masterplan and Landscape Masterplan, prepared by ACME and GrossMax respectively, that accompanies the application for further discussion of the urban regeneration and design principles that inform the proposed development scheme for each of the identified 'Sites'.

The proposed development at Site 4, while set back from O'Connell Street, announces the wider regeneration ambitions of the Dublin Central Masterplan at a key location adjoining the prominent key retail streets of Henry Street and Moore Street. The proposed development seeks to reinforce and augment fine urban grain and shopfront activity at street level and to extend viable, active uses into existing and new floor levels above. Retail and café / restaurant uses at ground level, complemented by residential and uses above, will improve the City Centre experience and encourage footfall through the streets to the Masterplan area and other neighbouring streets. Improved legibility, visibility and increased footfall will encourage further exploration and increased familiarity with the urban environment. This in turn will increase activity, passive surveillance, street safety and further cohesion and sense of place, for the streets behind the more well-known Henry Street and Moore Street. Increased use will attract further investment in the area, and so on.

Considerable care has been taken in the identification of suitable uses and in the architectural design, expression and materiality of the proposed development, to ensure that the proposed development is the correct fit for this site, in the context of its location adjacent to the O'Connell Street ACA and partially within the ACA, its prime frontage to Moore Street, and as part of the wider envisaged Dublin Central Masterplan regeneration area and acting as a connection between Moore Street and O'Connell Street.

The proposed development is representative of the consolidation of the sustainable compact redevelopment and revitalisation of an underutilised brownfield site in a high profile area of the city centre. It will attract and accommodate a greater variety of uses and people, in a well-designed urban environment, linked to high quality public transport and easily accessible to other city centre amenities and attractions by foot and bicycle.

The development proposed at Site 4 and envisaged for the wider Dublin Central Masterplan area is expected to generate the critical mass that will make a significant contribution to developing a strong city core. This in turn will support the development of Dublin as an internationally competitive city region.

Retail plays a crucial role in the city economy. Dublin Central as a whole and the Site 4 application site in particular are located in the retail core of Dublin City Centre. Site 4 addresses Moore Street (a Category 2 shopping street) and is located in close proximity to Henry Street (a Category 1 shopping street). It is submitted that the proposed development reflects many of the recommended 'Action Points' regarding city centre retail development noted above.

The proposed scheme 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. The proposed development seeks to integrate some of the historic building fabric and maintain the retail streetscape character along Moore Street. Site 4 seeks to retain active comparison retailing in individual units fronting Moore Street. The activation of these streets has the potential to create dwell zones and link to other cultural elements and points of interest within or adjoining the Dublin Central Masterplan area. Overall, this creates a quality mixed use scheme befitting this city centre location.

Site 4 provides mixed use development including retail, café / retail, residential and an office unit. It seeks to retain active comparison retailing in individual units fronting and Moore Street and to enhance the city centre experience in an area that is significantly underutilised considering its prime location.

Site 4 seeks to integrate the appropriate historic building fabric and maintain the retail streetscape character along Moore Street and Moore Lane. The retention of the existing street and laneway structure and creation of a new public plaza, enhances the potential to drive the regeneration of the adjacent streets. The activation of these streets has the potential to create dwell zones and link to other cultural elements and points of interest within or adjoining the Dublin Central Masterplan area and in the wider area generally, including the Parnell Street Cultural Quarter.

The applicant has a strong track record of sensitive urban regeneration projects, including those in historic city centres, such as Bishopsgate development located in Spitalfields in London. In 2017 Hammerson became the first real estate company globally to launch a comprehensive Net Positive strategy covering both environmental and socio-economic impacts. The team has worked hard to ensure resource efficiency, climate risk and health and wellbeing considerations were embedded at the outset of the Dublin Central design process.

It should be noted that the planning application was accompanied by a comprehensive EIAR which assessed the Masterplan as well as each individual sites.

The Landscape Masterplan, prepared by Gross Max Landscape Architects for the overall Dublin Central Masterplan is guided by an overall design vision which follows 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.

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 Bord 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 align with the requirements set out above. It notes *“The Dublin Central 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.”*

Furthermore, the energy efficiency measures to be adapted in the proposed development will assist in achieving the target set out in the Climate Action Plan 2024 to reduce carbon emissions within the built environment.

The planning application has been designed to be Ireland’s first Net Zero Carbon schemes, the design maximises sustainable energy uses, materials, uses appropriate SuDS measures throughout and enhances biodiversity of the urban block.

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

Policy CCUV2 Retail Hierarchy

To implement the retail hierarchy contained in the ‘Retail Strategy’ of this Development Plan and to support retail development at all settlement levels in the city. Retail development within the hierarchy of centres will be of a scale, type, and nature that reflects and enhances the role and function of the centre within which it is proposed as per the Retail Strategy, Appendix 2.

Policy CCUV3 Sequential Approach

To promote city centre and urban village vitality through the sequential approach to retail development, enable good quality development in appropriate locations, facilitate modal shift and to deliver quality design outcomes.

Policy CCUV4 The Role of Retail

To promote and support the major contribution of retail and retail services to the vitality and success of the city, as a significant source of employment, a focus of tourism, as an important recreational activity and as a link with other cultural, recreational and community activities.

Policy CCUV5 Retail Design Brief

To require that proposed retail developments for large-scale or sensitive sites are accompanied by a retail design brief guided by the key principles contained in the 'Retail Design Manual – DECLG, 2012'.

Policy CCUV6 Large Scale Retail / Mixed Use Developments

To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.

Policy CCUV7 Variety in Shopping Offer

Development proposals for major new retail and complementary developments will be expected to provide a range of unit sizes to encourage variety in the shopping offer and support small business growth.

Policy CCUV8 Competition and Innovation

To promote and facilitate competition and innovation in the retail sector to the benefit of the consumer, as an integral part of the proper planning and sustainable development of the city.

Policy CCUV9 Independent Retailing

To support the independent retailing sector by continuing to provide financial support, skills training and education through the Local Enterprise Office and other means.

Policy CCUV10 Specialist Shops

To acknowledge the unique attraction/distinctiveness of specialist shops / independent / indigenous retail in the city centre and inner city which contribute to the character and attractiveness of the city centre.

Policy CCUV11 Omni-Channel Retail

To promote and support 'Click and Collect' services which can reduce ecommerce deliveries and bring footfall to the city centre.

Policy CCUV12 Shopfront Design

To require a high quality of design and finish for new and replacement shopfront signage and advertising. Dublin City Council will actively promote the principles of good shopfront design as set out in Dublin City Council's Shopfront Design Guidelines and Chapter 15

Policy CCUV13 Vacant Units

To promote the temporary use of vacant premises in order to reduce the level of vacancy on streets in the city's urban centres including Key Urban Villages as this can compromise the vitality of urban centres. Temporary uses which can contribute to the economic, social and cultural vitality of the city centre, Key Urban Villages and other centres and which allow public access will be encouraged (pending permanent occupancy).

Policy CCUV15 Premier Shopping Area

To affirm and maintain the status of the city centre retail core as the premier shopping area in the State, affording a variety of shopping, cultural and leisure attractions. In line with the Retail Planning Guidelines, 2012, the city centre should be the main focus for higher order comparison retail in the city to protect its retailing role and primacy.

Policy CCUV16 Category 1 and Category 2 Streets

To protect the primary retail function of Category 1 Streets in the city and to provide for a mix of retail and other complementary uses on Category 2 streets. To promote active uses at street level on the principal shopping streets in the city centre retail core having regard to the criteria for Category 1 and Category 2 streets (see Appendix 2 and Figure 7.2).

Policy CCUV17 Diversifying the City Centre

To ensure the resilience of Dublin City Centre to changing trends in retail demand, appropriate opportunities to further diversify the city centre as a place to live, work and socialise will be encouraged.

Policy CCUV18 Residential Development

To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings. The use of upper floors for residential use is supported in principle on Category 1 and 2 Shopping Streets.

Policy CCUV19 Parking and the Retail Core

To support the re-use and replacement of multi storey car parks in the centre of the retail core and to safeguard short term car parking provision for shoppers and visitors at the periphery of the retail core. The redevelopment of central car parks will support public realm improvements and pedestrian priority in the retail core and can support the retail core and night time economy by providing additional mobility hubs and other innovative transport solutions, see also Policy SMT28 (Chapter 8).

Objective CCUV05 Underutilised and Inactive City Centre Streets

To reactivate the underutilised and inactive city centre streets and lanes in the city centre through the inclusion of art, landscaping, street furniture, outdoor dining, activity spaces and residential uses.

Policy CCUV30 Cafés / Restaurants

To promote and facilitate the provision of cafés / restaurants in the city and support their role in making the city more attractive for residents, workers, and visitors and in creating employment.

Policy CCUV31 Food and Beverage Clusters

To support emerging food and beverage clusters around the city centre; see Figure 4, Appendix 2, particularly around the Henry Street and Westmoreland Street areas of the city to enhance the appeal of the north and south retail cores.

Policy CCUV32 Outdoor Dining

Proposals for outdoor dining / trading from premises extending into the street will be supported where they would not harm local amenity or compromise pedestrian movement, accessibility needs or traffic conditions.

Policy CCUV33 Support for Markets

To facilitate indoor and outdoor markets both in the city centre and throughout the city particularly where they support the existing retail offer and local produce/start up enterprise and the circular economy; and to realise their potential as a tourist attraction.

Policy CCUV34 Moore Street Market

To recognise the unique importance of Moore Street Market to the history and culture of the city and to ensure its protection, renewal and enhancement in cooperation with the traders, and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report, the OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform.

Policy CCUV35 Night Time Economy

To support and facilitate evening / night time economy uses that contribute to the vitality of the city centre and that support the creation of a safe, balanced and socially inclusive evening / night time economy.

Policy CCUV36 New Development

To support uses that would result in the diversification of the evening and night time economy where there is little impact on the amenity of adjoining or adjacent residential uses through noise disturbance and where there are no negative cumulative impacts in terms of other night-time economy uses in the area.

Policy CCUV37 Plan Active and Healthy Streets

To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is

to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.

Policy CCUV38 High Quality Streets and Spaces

To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.

Policy CCUV39 Permeable, Legible and Connected Public Realm

To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.

Policy CCUV40 Public Safety

To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.

Policy CCUV42 Public Realm – City Centre

To move to a low traffic environment generally and to increase the amount of traffic free spaces provided in the city centre over the lifetime of the Plan as well as create new high quality public realm areas where possible taking into account the objective to enhance access to and within the city centre by public transport, walking and cycling.

Policy CCUV44 New Development

That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility

2.4.1 Applicant's Response

Site 4 comprises retail, café / restaurant, cultural, office and residential, which are all permissible in principle under the land use zoning.

The scheme 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, café / restaurant and cultural uses at ground and first floor levels, complemented by residential and hotel use at upper floors.

Site 4 provides for 5 no. retail units (c. 617 sq. m), all of which are located in the block south of the National Monument. The proposed retail units vary in size and range between 75 and 150 sqm. All of which are serviced directly from the street. Retail uses are spread across a mix of retail typologies in the form of medium sized units and smaller shop units. These typologies are strategically placed throughout in order to create a vibrant mixed-use environment with character and active frontages.

Smaller retail units are proposed on Moore Street, in keeping with Moore Street's traditional role as a market street and Category 2 Street Designation for Moore Street. It is anticipated that such units may attract small, independent or specialist retailers.

It is requested that for the smaller retail units on Moore Street and the new north south street that some flexibility would be applied in respect of their permitted use. In the planning notice we have identified for each of these units several possible uses, including retail / café / restaurant/ licenced premises, and including take away/collection facility for café/restaurant use in each case. This range of uses will be typically found in the 'high street' are to help to provide a vibrant and range of activity in the City which is vital to the success of any city centre area.

This flexibility is imperative to achieve a good mix of uses, to enable the Applicant to market these, attract end users to these units to active the scheme.

The proposed retail use, in combination with the other café/restaurant and residential uses within Site 4 will help to create an active and vibrant retail streets and mixed use urban quarter.

In terms of the overall Dublin Central Masterplan it is an ambition to:

- Drive long term value provision of high quality commercial and retail space.
- A mix of uses that drives footfall and vibrancy 24/7 including retail and retail services, commercial office space, a variety of residential accommodation, hotel uses, food and beverage, and strategically located non-commercial uses.
- Provide a mix of retail uses including:
 - Independent/lifestyle retail and food & beverage uses along Moore Lane;
 - Medium Sized Unit (MSU) retail space along O'Connell Street (circa. 12,000 sq.ft.);
 - Flagship MSU retail space fronting Henry Street;
 - More local, artisan and service type retail on Moore Street.
- Incorporate a flagship retail offer within the existing Carlton

The Dublin Central Masterplan also considered the relationship with Moore Street providing new active frontage an connections to support the market.

Dublin City Council's laneway improvement strategy ('Reimagining Dublin One Laneways' – 2018) finds that Dublin 1 is underutilised in its core and in particular along it laneways which are characterised as in many cases as suffering from dilapidation, lack of frontage at ground floor and received unsafe character. The Site 4 development seeks to redress this by providing shop fronts and active uses to Henry Place and Moore Lane. This is expected to renew activity and animate these laneways.

In relation to Shopfront design we would highlight that individual shopfront signage cannot be determined until tenants are secured. Therefore, a general shopfront strategy has been devised by ACME Architects. We refer to the Masterplan Design Statement, prepared by ACME Architects for shopfront and signage design principles as submitted as part of the application and to the accompanying Architectural Heritage assessments prepared by Molloy & Associates, Conservation Architects which addresses the appropriateness of this shopfront strategy.

We also refer the Bord to Section 4.7 – Building Character, Appearance and Materials and Section 4.8 - Shopfronts in the Site 4 Design Statement, and also to Appendix 4 of the Dublin Central Masterplan Design Statement, each prepared by ACME and submitted with the planning application. The architectural treatment of shopfronts in this scheme has been carefully considered to closely reflect the character of adjoining shopfronts within the O'Connell Street Architectural Conservation Area.

It would be unduly onerous to require separate planning applications for all signage within the Site 4. We would request that the Bord attaches a condition similar to the one in the decision to grant permission from Dublin City Council, Condition 18 which states the following:

"A scheme of shopfront design, including any associated signage, lettering, lighting or internal security screens, shall be submitted to the planning authority for written agreement before the development commences."

As per Condition 30 of the decision to grant permission in this case, we wish to confirm that the Applicant is committed to participating in that process under the leadership of Dublin City Council as

the owner and licensor of the street market. The Applicant would request a similar condition be attached to any grant of permission for the Site 4 application.

In respect of public realm we would refer the Bord to discussions under Section 2.9 of this report.

2.5 Chapter 8 – Sustainable Movement & Transport

Policy SMT1 Modal Shift and Compact Growth

To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.

Policy SMT2 Decarbonising Transport

To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.

Objective SMT01 Transition to More Sustainable Travel Modes

To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).

Policy SMT3 Integrated Transport Network

To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.

Policy SMT4 Integration of Public Transport Services and Development

To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.

Policy SMT5 Mobility Hubs

To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.

Policy SMT6 Mobility Management and Travel Planning

To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.

Policy SMT7 Travel Plans for New and Existing Developments

To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.

Policy SMT11 Pedestrian Network

To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.

Objective SMT02 Improving the Pedestrian Network

To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.

Policy SMT16 Walking, Cycling and Active Travel

To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

Policy SMT18 The Pedestrian Environment

To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

Objective SMT012 Cycle Parking Spaces

To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.

Objective SMT014 Cycle Parking Facilities

To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.

Policy SMT34 Street and Road Design

To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.

Policy SMT35 Traffic Calming and Self-Regulation Street Environments

To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

2.5.1 Applicant's Response

The Development Plan sets out that in order to maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and nodes (rail stations and interchanges) and at other key locations such as key district centres.

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, 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).

This level of accessibility supports the development of a sustainable high density community in the North Inner City that is connected both locally and to the wider Dublin environs.

We refer the Bord to the Traffic Assessment and Travel Plan, prepared by Waterman Moylan Consulting Engineers as submitted as part of the application in respect of existing and future public transport, pedestrian and cycling links to the site.

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 was submitted as part of the application. This has informed the design process of the Masterplan as a whole. A core principle of the Masterplan is the introduction of greater sub-division within the overall area, through the integration of additional new streets, laneways / passageways and public spaces. The resultant block pattern is intended to present a more permeable and finer urban grain, offering choice of movement and activity, within a coherent and legible public realm composed of an accessible and attractive network of streets and open spaces.

2.6 Chapter 11 – Built Heritage and Archaeology

Record of Protected Structures


A number of buildings within the overall Dublin Central Site are included in the Record of Protected Structures:


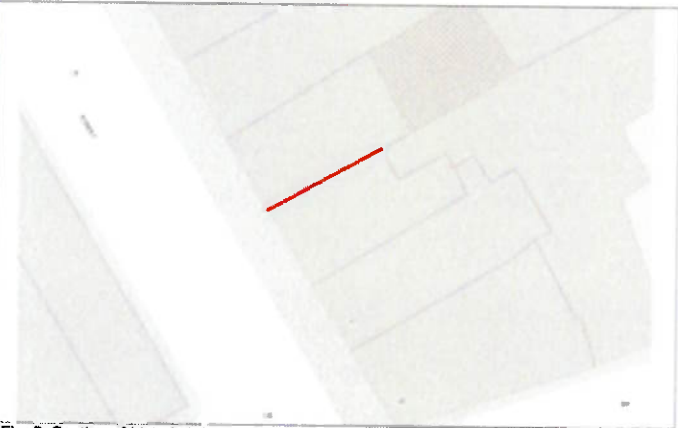
RPS Ref.	Address	Description
6022	42 O'Connell Street Upper, Dublin 1	Commercial premises
6023	43 O'Connell Street Upper, Dublin 1	Commercial premises: front façade
6024	44 O'Connell Street Upper, Dublin 1	Commercial premises: front façade
6025	52-54 O'Connell Street Upper, Dublin 1	Former Carlton Cinema: upper floor façade
6026	57 O'Connell Street Upper, Dublin 1	Commercial premises: front façade
6027	58 O'Connell Street Upper, Dublin 1	Commercial premises: front façade
6029	61 O'Connell Street Upper, Dublin 1	Commercial premises: front façade
6423	70 Parnell Street, Dublin 1	Licensed premises



8906	4-8 Henry Place, Dublin 1	Commercial premises (former O'Brien's Mineral Water Factory): 19 th century ground floor facades to Henry Place and Moore Lane.
8907	17-18 Henry Place, Dublin 1	Commercial Premises (former Bottling Stores) ground floor façades to Henry Place and Moore Lane
8908	10 Moore Street, Dublin 1	Two-storey, historic brick party wall (only) between 12 and 13 Moore Street, with evidence of 'creep holes' from 1916.
8910	13 Moore Street, Dublin 1	Two-storey, historic brick party walls (only) between Nos. 13 and 12 and Nos. 13 and 14 Moore Street (RPS No. 5282) with evidence of infilled creep holes <u>dating from 1916</u>
8911	20-21 Moore Street, Dublin 1	Commercial premises

Those properties shown in bold above have been added to the Record of Protected Structures since the application in Site 4 has been appealed to An Bord Pleanala.

Of the list above, the following more recent Additions to the Record of Protected Structures relate to Site 4 following their approval in November 2022 by Dublin City Council:-

RPS Ref.	Address	Description	Extent of Protected Structure Status
8907	17-18 Henry Place, Dublin 1	Commercial Premises (former Bottling Stores) ground floor façades to Henry Place and Moore Lane	 <p>Protected Structure and Curtilage</p> <p>Fig. 2: 17/18 Henry Place, Dublin 1: extent of Protected Structure and curtilage outlined in red.</p>

8908	10 Moore Street, Dublin 1	Two-storey, historic brick party wall (only) between 12 and 13 Moore Street, with evidence of 'creep holes' from 1916.	 <p>Fig. 2: 10 Moore Street, Dublin 1: extent of Protected Structure status and curtilage outlined in red.</p>
8909	12 Moore Street, Dublin 1	Two-storey, historic brick party wall (only) between 12 and 13 Moore Street, with evidence of 'creep holes' from 1916	 <p>Fig. 2: Section of historic brick party wall between 12 and 13 Moore Street, Dublin 1: extent of Protected Structure status and curtilage outlined in red.</p>

8910	13 Moore Street, Dublin 1	Two-storey, historic brick party walls (only) between Nos. 13 and 12 and Nos. 13 and 14 Moore Street (RPS No. 5282) with evidence of infilled creep holes <u>dating from 1916</u>	 <p>Figure 2: Section of surviving historic brick party wall between Nos. 13 and 12 Moore Street, and Nos. 13 and 14 Moore Street, Dublin 1: extent of Protected Structure status and curtilage outlined in red. It is noted that No. 14 Moore Street is already on the Record of Protected Structures and forms part of the National Monument at 14-17 Moore Street, Dublin 1.</p>
8911	20-21 Moore Street, Dublin 1	Commercial premises	 <p>Fig. 2: 20/21 Moore Street, Dublin 1: extent of Protected Structure status and curtilage outlined in red.</p>

For the convenience of An Bord Pleanála, attached with this submission is a copy of the Reports of Dublin City Council in respect of these properties 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, where relevant, its curtilage. For clarity and avoidance of doubt, the maps showing the Extent of Protected Structure Status for the properties above are taken directly from these DCC documents. The decision to add these structures to the Record of Protected Structures remains the subject of pending legal proceedings, High Court 2023 3 JR. Pleadings have not yet closed, and no hearing date has been listed. The proposals within this response are made without prejudice to those proceedings, and the questions raised about the validity of the decision by the Council.

Policy BHA2 Development of Protected Structures

That development will conserve and enhance protected structures and their curtilage and will:

(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.

(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.

I Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.

- (d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.*
- (c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure.*
- (d) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.*
- (e) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the protected structure.*
- (f) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- (g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development.*
- (h) Have regard to ecological considerations for example, protection of species such as bats.*

Policy BHA3 Loss of Protected Structures

That the City Council will resist the total or substantial loss of protected structures in all but exceptional circumstances.

Policy BHA4 Ministerial Recommendations

To have regard to the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning applications.

Policy BHA5 Demolition of Regional Rated Building on NIAH

That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having regard to the provisions of Section 51, Part IV of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Policy BHA7 Architectural Conservation Areas

- (a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.*
- (b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA. (c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.*

(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.

(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.

All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease.

Policy BHA11 Rehabilitation and Reuse of Existing Older Buildings

(a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.

(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.

(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.

Policy BHA24 Reuse and Refurbishment of Historic Buildings

Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.

2.6.1 Applicant's Response


There is extensive 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 Bord will have regard to same in their consideration of this application. It is not proposed to re-state all of that voluminous material here.




Since the submission of this application for Site 4 and subsequent appeals, No. 10 Moore Street, No. 12 Moore Street, No. 13 Moore Street, No. 17-18 Henry Place and No. 20-21 Moore Street have been added to the Record of Protected Structures. For the convenience of An Bord Pleanála, 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 Bord will verify this position with the Planning Authority.

We refer the Bord to the Architectural Heritage Impact Assessment prepared by Molloy & Associates Conservation Architects, as submitted with the application. In particular Appendices A4.3, A4.4, A4.5 A4.6 and A4.10 which describes the protected structures in detail. In particular, the Bord 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 Bord 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 is 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 Bord 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 application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.	Of high significance Rear attached buildings are of limited/no significance	<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 wall bond to south elevation, granite coping. The square-headed window openings to the upper floors are replacement timber casements. The ground floor shopfront has been replaced. Brick frontages suggest a late-19 th or early 20 th century date and the building was substantially upgraded in 1950. However, there is evidence internally that early fabric survives within the building.	Main house to be adapted for use as apartments over retail. 
12 Moore Street	Building of limited/no significance Party wall with No.13 of high significance	<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> <i>A surviving party wall shared with No.13 Moore Street is 18th century in origin but visible only from within No.13.</i>	Building to be demolished and site redeveloped

			<i>No evidence of early fabric survives elsewhere.</i>	The party wall to be retained.	
13 Moore Street	Building of limited/no significance Party wall with No.12 of high significance	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. The building was rebuilt in the 1960s for the Kylemore Bakery. A surviving party wall shared with No.12 Moore Street is 18 th century in origin and presents with two possible creep holes.		Building to be demolished and site redeveloped The party wall to be retained.	
Nos 20-21 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	Of high significance	<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>		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	

a planning application for Dublin Central-Site 4, Appendix A4.11 'Assignment of Significance of Certain Upstanding Building Fabric'.			
--	--	--	--

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 the City Council to achieve this objective are 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 Architectural Conservation Area (ACA). Site 4 itself lies outside the ACA.

Site 4 is bound by the O'Connell Street Architectural Conservation Area to the south and to the east. Site 4 is also situated to the north and south of Nos. 14 – 17 Moore Street, both a National Monument and a Protected Structure. An extension to the National Monument, more specifically within No.18A Moore Street, is proposed as part of the development at Site 4. The retention and purposeful integration of Nos 6-7 Moore Lane within the scheme further compliments and enhances the rear of the National Monument, Nos 8-9 Moore Lane. Although the proposed development is not situated in the O'Connell Street ACA and does not include proposals to the National Monument, the Site 4 location is still considered historically significant due to its proximity to both and its setting on Moore Street. In order to facilitate the construction of the development at Site 4, it is proposed that a wall to the rear of the Carlton Cinema will be demolished. This is located within the O'Connell Street ACA. Consideration has been given to the O'Connell Street ACA given its proximity.

The principal objectives of the ACA include urban and building conservation, restoration and rehabilitation of existing building stock in appropriate manner concurrently with the regeneration of the area.

Site 4 comprises the conservation, refurbishment, repair and adaption of existing structures including: -

- **No. 10 Moore Street:** This building is retained almost in its entirety as part of the proposed development, with the exception of the later extension at ground floor level to the rear of the building. Whilst not a protected structure at the time of submission, proposals for this building were designed as if it were a protected structure. As a consequence, the proposed works are considered to respect the character of the building, and in their alignment with architectural heritage policies in Chapter 11 of the Dublin City Development Plan 2022-2028, do not require review.
- The protected party walls of **No. 12 Moore Street** and **No. 13 Moore Street** are also to be retained and integrated as part of the new buildings proposed. As above, the retention of these walls was voluntarily proposed as part of the originally submitted design strategy. Its conservation and presentation within the rebuilt forms of Nos 12 and 13 reflects best practice as set out in Chapter 11 of the Dublin City Development Plan 2022-2028. No change in proposed work scopes arising from its inclusion in the RPS is thus required.
- **Nos. 20 – 21 Moore Street:** The buildings located at this address are completely retained as part of the proposed development. However, the building that extends to the rear of the plot

becoming 12 Moore Lane has been removed. A café fronting onto the new public plaza and Moore Street is proposed at the ground floor, with the upper floor being converted into residential apartment units accessed from Moore Street. The proposals seek to enhance the character of this important 18th century survivor. In detaching the building from its mid-terraced position, and in efforts to enhance the amenity of upper rooms, it is considered necessary to create openings in its southern gable. Notwithstanding, the proposed works on the whole are considered to accord with architectural heritage policies as set out in Chapter 11 of the Dublin City Development Plan 2022-2028. As a consequence, they do not require review as part of this process.

- **Nos. 17 – 18 Henry Place:** The building currently located at this address has a truncated façade and has lost one full storey. As part of this proposed development it is proposed to retain the façade and build a one storey extension above to restore the building to its original height. The proposed uses are a retail unit on the ground floor and residential units above, accessed from the podium courtyard. To better integrate the building with its street, it is proposed to amalgamate two windows to create an entrance. This type of intervention is commonplace with protected structures, and is not considered to require review owing to the change in the building's statutory protection since first submitted.
- **Nos. 6 – 7 Moore Lane:** The building at this location is retained as part of the proposed development and will be restored to accommodate a retail unit connected to 5 ½ Moore Lane, a bar on ground and basement levels and an office for the developer on the upper level, accessed from a small reception on the ground floor. Whilst not included in the recent additions to the RPS, this building is considered highly significant. All works are proposed in alignment with architectural heritage policies set out in Chapter 11 of the Dublin City Development Plan 2022-2028, irrespective of its statutory status.

We refer the Bord to the following reports that accompany the application and which are important in understanding how Site 4 has been conceived, considered and further refined in order to ensure that it will make a positive contribution to the architectural and civic design quality in this context: -

- Architects Design Statement, prepared by ACME Architects, provides an in-depth analysis of the site and surrounding historic and existing context, which has informed the architectural design of Site 4.
- Dublin Central Masterplan Area Conservation Management Plan, prepared by Molloy & Associates Conservation Architects, which notes the Conservation plan for the Masterplan as a whole.
- Architectural Heritage Impact Assessment together with its appendices, prepared by Molloy & Associates Conservation Architects, which considers the impact of the proposed building on the architectural heritage and setting of the site and its surroundings.
- Chapter 12: Landscape and Visual Impact Assessment of the accompanying EIAR, prepared by ARC, which includes a visual impact assessment of Site 4, having regard to the pattern of change and to the existing historic and urban landscape that characterises the site location.
- Chapter 15: Cultural Heritage (Architectural) of the accompanying EIAR prepared by Molloy & Associates Conservation Architects, which includes conservation plans and mitigation for Site 4.

Further to the above, the Development Plan also sets out that it is a priority for Dublin City Council that the city is and will be a space to make, experience and share culture.

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.

We refer to the Architectural Heritage Impact Assessment (AHIA) report prepared by Molloy Associates for further discussion of the architectural heritage significance of the buildings within Site 4. We refer the Bord to Section 7.2 and Section 7.3 of same report, which respond to the architectural heritage protection policies within the Development Plan and demonstrate adherence with *Part II-Development Control, Section A, New Development* of the O'Connell Street Architectural Conservation Area. The AHIA, not only gauges impacts generally relative to statutory Development Plan and ACA policies, but to provide a more rounded view of impacts, by reference to non-statutory architectural heritage protection policies within the Dublin Central Conservation Plan contained in Appendix A4.1 of the AHIA. Details of building records and their chronologies are carefully set out in Appendix A4.2-9 of the AHIA. The details of this analysis tallies with that of the new protected structures in this application site and as a result, the development proposed has been designed taking in to account the relevant historic fabric located here.

With regard to massing the AHIA notes that, where practicable, existing façades and selected buildings have been integrated into Site 4 to preserve the subdivision of the individual shopfronts and maintain the rhythm of the streetscape. With regard to scale and height, Site 4 comprises buildings of 2 – 3 storeys in height.

In terms of materiality, the Heritage Impact Assessment finds that 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. New buildings and extensions are predominantly in brick, in a complementary and intentionally contrasting tone to the existing red brick on Henry Street. Rooftop elements clad in corten steel present a contemporary take on the traditional metal seamed roofs, to preserve the character of the highly modulated roofscape.

Regarding uses, the AHIA report notes that the diverse range of uses will act as a catalyst for the regeneration of the area and that residential use will have a positive impact on the area and ensure the long-term occupancy of the ACA.

2.7 Chapter 12 – Culture

Policy CU7 Cultural Clusters and Hubs

To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.

Policy CU12 Cultural Spaces and Facilities

To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments such as in basement or rooftop spaces where suitable to meet the needs of an increased population within the city.

Policy CU15 Cultural Uses in the Design and Uses of Side Streets

To encourage the rejuvenation of quieter urban streets by the inclusion of cultural uses both in the design and uses of side streets.

Objective CU025

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition,*

performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.

**Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*

Applicant's Response

The overall Dublin Central Masterplan will bring together cultural activities interlinked with supporting uses, such as a Hotels, Residential use, Café/Restaurant units and Office Spaces to create vibrant, defined a cultural quarter and community within this urban block.

The Dublin Central Masterplan rejuvenates quieter urban streets by introducing new pathways and the inclusion of cultural uses both in the design and uses of side streets.

It is noted that Objective CUO25 refers to “all new regeneration areas (SDRAs)” in the context of providing community, arts and culture spaces. The Dublin Central Masterplan area is located within SDRA 10 – Northeast Inner City and identified as a ‘Key Opportunity Site’. The Dublin Central Masterplan covers an area of c. 2.2 Ha and will see the regeneration and revitalisation of the urban block broadly bound by Parnell Street and O’Rahilly Parade to the north, O’Connell Street Upper and Henry Place to the east, Henry Street to the south and Moore Street to the west.

While the Site 4 planning application/appeal is currently being assessed in isolation, it is also considered appropriate that the provision of community, arts and culture spaces should be assessed in the context of the wider Dublin Central Masterplan.

Having regard for the development requirements, the following sets out a calculation for the provision for community, arts and culture spaces space for both Site 4 and within the wider Dublin Central Masterplan context.

Use	Site 1	No. 61	Site 2	Site 3	Site 4	Site 5	Total
Proposed Culture / Community Space – RFI			553 sq. m				553 sq. m
Pocket Square at the Reading Room			120 sq. m				120 sq. m
Public Square					1,085 sq. m	168 sq. m	1,253 sq. m
Cultural / Gallery / Café – The White Building				123 sq. m			123 sq. m
Extension to National Monument – A Cultural Facility					60 sq. m		60 sq. m
Historic Paving – Across Masterplan							690 sq. m
New streets / passageway		68 sq. m	650 sq. m	410 sq. m			1,128 sq. m

Total Cultural / Social Space	TBC	68 sq. m	1,323 sq. m	533 sq. m	1,145 sq. m	168 sq. m	3,927 sq. m
Metrolink Public Areas							9,812 sq. m

% of total Cultural Space in Site 4 in respect of the GFA of Site 4	
Total GFA of Site 4	3,290 sq. m
Total Site 4 Cultural GFA	1,145 sq. m
% of Cultural / Social Space of Site 4 GFA	34 %
% of Cultural Space Across the Dublin Central Site (1-5)	
Total DCP GFA (excluding Site Enabling Works)	75,916 sq. m
Total Cultural / Social Space	3,927 sq. m
% of Cultural / Social Space of total GFA	5.2 %
% of Cultural Space including MEW Site Enabling Works Across the Dublin Central Site (2-5)	
Total GFA (Including Site Enabling Works)	85,728 sq. m
Total Cultural GFA and Metro Link Public Areas	13,739 sq. m
% of Cultural / Social Space GFA	16%

As can be seen in the table above there is a number of indoor and outdoor cultural and community spaces proposed across the Dublin Central Masterplan, these are as follows: -

- 553 sq. m of cultural / community space is part of the Site 2.
- In the Pocket Square at the Reading Room within the Site 2 scheme there is possibility for public artwork, informal gathering and possible seating for associated licensed restaurant / café units with takeaway / collection facility' at ground floor level of the Reading Room.
- In the Public Square (Site 4 & Site 5) there is possibility for public artwork, a range of events (theatre, cinema, performances etc.) and informal gatherings.
- The White Building (Site 3) – The proposed use envisages a cultural / gallery venue, with the café at ground floor and exhibition space extending to 1st floor. This would create a destination, interpretative and exhibition center, and place of interest for the general public, visitors and local residents. The proposed gallery exhibition space may host exhibitions and other events of contemporary social and cultural significance.
- The proposal seeks to retain and consolidate historic paving across the Masterplan site which will support the possibility of introducing a historic trail in cooperation with a Third Parties.

Section 12.5.7 – Culture in the Public Domain of the Development Plan notes that “*public spaces play a highly significant role in the public expression and cultural value of the city.*” It is envisioned that the public plaza (Site 4 & 5) would be capable of hosting open air events once implemented as noted above.

Furthermore, having regard for Objective CU037 – Street Art of the Development Plan there is an opportunity to use along the proposed wall to the rear of No. 61 O’Connell Street Upper (i.e. along the new passageway) for art installations. Any future artistic installation would be subject to agreement with DCC.

In summary, 34% of the Site 4 GFA is dedicated towards community, arts and cultural spaces. **In the context of the Dublin Central Masterplan, 5.2% of the area is dedicated towards community, arts and cultural spaces which is in excess of the minimum requirement set out under Objective CU025.**

Furthermore, we note that the MetroLink public areas comprise 11% of the total Dublin Central GFA (including site enabling works) before the other community, arts and cultural spaces are even considered. We respectfully submit that these public areas should be considered as part of the community space provided as part of this Development. **The community, arts and culture space when considered together with the MetroLink public areas accounts for 16% of the Dublin Central Masterplan which is well in excess of the 5% noted under Objective CU025.**

To contextualise the application site / Dublin Central lands they 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. The list below (not intended to be exhaustive) is some of the cultural attractions (a number of which are world renowned) within a short walk of the application site / Dublin Central lands: -

- The GPO (Landmark & Museum).
- Moore Street Market.
- Gate Theatre.
- James Joyce Centre.
- Dublin Writers Museum.
- Abbey Theatre.
- 14 Henrietta Street (Museum).
- Garden of Remembrance.
- The Academy.
- Ambassador Theatre.
- Hugh Lane Gallery (Charlemont House).
- The Spire.

Under the Urban Regeneration and Development Fund (URDF), the 'North Inner City Concept Area 1' is to receive €121.3 million in URDF funding for projects including: -

- The allocation of €12.7m towards the regeneration of the National Monument at Nos. 14 – 17 Moore Street, including the structural and restoration works on the four houses **to facilitate the creation of a 1916 Commemorative Centre** and associated museum building to the rear of the historic buildings.
- Moore Street Public Realm Renewal works to include lighting, **public art**, paving, stalls, signage, to reactivate one of the City's most important trading streets.
- Parnell Square Public Realm works to create a **civic space linking within the Parnell Square Cultural Quarter buildings, including new city library** (work have commenced on the new library).

The first phase of construction on the Dublin City Library commenced in November 2022. Furthermore, works on the 1916 Commemorative Centre are due to commence imminently and due to be completed by 2026 (as reported in the media May 2023). The proposed public plaza (Site 4 & 5) as part of the Dublin Central Masterplan will link directly to the rear of the 1916 Commemorative Centre, providing direct access to this cultural amenity.

As such, given the provision of community, arts and cultural spaces across the Dublin Central Masterplan and the significant extent of existing cultural facilities within the wider context of these lands it is considered that that the provisions of Objective CU025 are more than adequately met.

2.8 Chapter 13 – Strategic Development Regeneration Area

O'Connell Street/Moore Street Civic/Cultural Hub

*In recognition of the historic built form and history of the area and the potential for public interaction given its key location in the north retail core. With proximity to the emerging cultural quarter around Parnell Square, and its associated range of arts and literary attractions, this hub would act as a natural extension to the existing cultural quarter extending its reach, blending with a new mix of uses. With excellent transport access, this precinct will become even more accessible to the wider public when planned public transport improvements are delivered over time. The Moore Street market will become a re-energised market street, with a significantly improved public realm and act as a gateway, and through route, to the historical assets of the area, to create synergies to benefit the entire city block, breathing new life to the area. (*The historical assets are not limited to Moore Street/Moore Lane, but include O'Connell Street & the GPO)*

Housing

- *To promote an increased residential population and the successful integration of new and established residents and communities.*
- *To ensure that new residential developments accord with the indicative layout illustrated in the framework, supporting social, community and amenity infrastructure/services in the local area.*
- *To promote a variety of house types and tenures, avoiding an over-concentration of specialist accommodation such as tourist and student accommodation, thereby, ensuring capacity for the growth of balanced residential communities.*
- *To promote the development of high quality residential mews dwellings at appropriate locations and in accordance with relevant standards, thereby, unlocking the residential potential of laneways, improving public realm, and increasing pedestrian permeability where possible.*

Education and Employment

- *To encourage local employment, where the appropriate skills are available, on construction projects in the area.*
- *To support the use of educational buildings within the area for evening and weekend use in the provision of education related services and recreational use.*
- *In association with relevant agencies, to encourage the development of Social Enterprise in the area by promoting the development of new enterprise space / starter units in appropriate locations.*
- *To support the development of a heritage/tourist/ literary trail (as identified in the Mulvey Report) in association with relevant agencies such as Tourism Ireland, Waterways Ireland, the NTA, and in consultation with key stakeholders.*

Guiding Principles for Key Opportunity Sites

O'Connell Street/Moore Street Civic/Cultural Hub

1 – O'Connell Street to Moore Lane incorporating Carlton Site

This 2.2 ha site incorporates buildings extending from O'Connell Street, Ireland's premier street, to Moore Street, including Moore Lane, O' Rahilly Parade, Henry Street North and Henry Place. It is identified within the Guiding Principles Map as a civic/cultural hub because of both its historical/cultural importance and because of its potential as a focus for quality retail and mixed-use development. The site is of significant historical importance given its association with the 1916 Easter Rising, and Moore Street is also well known for its open-air fruit and vegetable market. The area has the potential to be transformed through heritage led, mixed-use regeneration that acknowledges and responds creatively to the cultural roles and historical significance of this centrally located site.

Scheme design shall be based on a comprehensive masterplan that incorporates a convenient access route to the planned Metrolink stop, quality connections across the site, and a cultural interpretative element.

Any final proposal must incorporate at least one new east-west pedestrian route interlinking to at least two new civic spaces within the block, utilising the existing lane structure for cross connections.

Masterplan proposals should hence incorporate the following:

- *New pedestrian connections linking both O’Connell St. to Moore St. via a new public square, and also Henry Street to Henry Place/Moore Lane.*
- *Exceptional architectural design to match the importance of this city block that will effectively interlink the historic GPO with the emerging cultural quarter at Parnell Square.*
- *A new civic square, open to the public, and quality pedestrian access to the proposed Metrolink station.*
- *An appropriate mix of uses to ensure activity both day and night. Active ground floors should front public routes.*
- *The restoration of a significant element of the Upper O’Connell Street streetscape, including the former Carlton Cinema façade, No 42 O’Connell Street, and Conway’s Pub on Parnell Street.*
- *Heritage –led retention and restoration of all pre-1916 buildings and fabric along Moore Street.*
- *Acknowledge the urban architectural and historical context and complement the scale and design of the National Monument at Nos. 14 -17 Moore Street and its reuse as a commemorative visitor centre (URDF Government funding relates).*
- *Moore Street Public Realm Renewal works to include lighting, public art, paving, stalls, signage (URDF Government funding relates).*
- *Promote a high quality street market that firstly offers a diverse food range, speciality food with outdoor seating serving same that knits with the proposed Public Realm Renewal works proposed for the area and secondly a high quality urban environment that promotes a mix of uses, including residential at upper levels to ensure passive supervision and continual activity.*
- *A detailed phasing plan to address different stages of construction, co-ordinated as necessary with other planned works that may take place during the planned construction period.*

Proposals for this area must also have regard 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.*
- *Protected Structures (as provided on the City Council’s Record of Protected Structures (RPS)) and the policies and objectives of this development plan for such structures, together with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).*
- *Ministerial Recommendations for the proposed addition of buildings and other structures to the City Council’s RPS, provided under Section 53 of the Planning and Development Act, 2000 (as amended), together with the relevant policies and objectives for same in this development plan.*
- *The content of the Moore Street Advisory Group’s 2021 report to the Minister.*
- *Proposals for this area must also have regard 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.*
- *Protected Structures (as provided on the City Council’s Record of Protected Structures (RPS)) and the policies and objectives of this development plan for such structures, together with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).*
- *Ministerial Recommendations for the proposed addition of buildings and other structures to the City Council’s RPS, provided under Section 53 of the Planning and Development Act, 2000 (as amended), together with the relevant policies and objectives for same in this development plan.*

- The content of the Moore Street Advisory Group's 2021 report to the Minister.

2.8.1 Applicant's Response

The application site now falls within the Strategic Development Regeneration Areas (SDRA) 10 – Northeast Inner City (NEIC). The Development Plan states that: -

"Given the significance of this area and its regeneration potential, Dublin City Council is committed to preparing a Local Area Plan for this SDRA during the lifetime of this development plan, and, therefore, this SDRA forms an interim strategy and sets guiding principles for the LAP."

Whilst DCC are committed to preparing an LAP, we understand that no steps have been taken to commence the preparation of said LAP to date and that the Planning Authority are satisfied planning permission can be granted for development on the strength of these SDRA principles in the absence of an LAP as is evidenced by their decision in respect of the Site 2 development, now also on appeal with the Bord.

In the absence of a LAP, a Masterplan for the entirety of the Dublin Central site has been undertaken. We refer the Bord to the Masterplan Design Statement, prepared by ACME Architects which sets out the frameworks for the redevelopment of the overall land holding. It is evident from the Dublin Central Masterplan documents and the Site 4 application material in particular, that the proposals in this case have been strongly influenced by the heritage of the area. Further detail with regard the Masterplan is set out in Section 6 of the Planning Application Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.

Notwithstanding, it is noted that the Dublin Central lands are identified as a 'Key Opportunity Site' within the SDRA. We set out below how the proposed development (and the wider Dublin Central Masterplan) closely align with the aspirations set out in the SDRA.

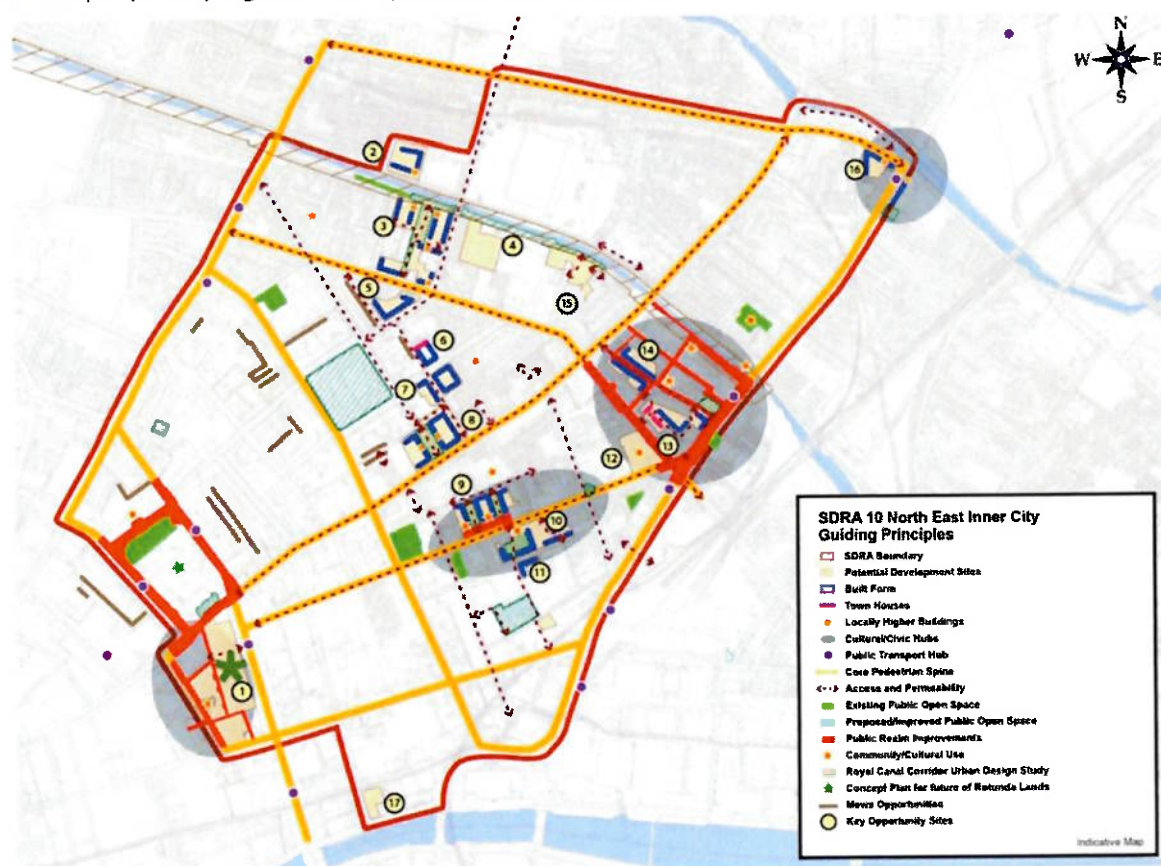


Figure 1: Extract from Figure 13-12 of the Dublin City Development Plan 2022 – 2028 with Dublin Central marked indicatively with a green star, identifying the Dublin Central lands as a 'Key Opportunity Site 1' within SDRA 10.

Guiding Principles for Key Opportunity Sites

With Regard SDRA 10, the Development Plan states that: -

“The area has the potential to be transformed through heritage-led, mixed-use regeneration that acknowledges and responds creatively to the cultural roles and historical significance of this centrally located site.

Scheme design shall be based on a comprehensive masterplan that incorporates a convenient access route to the planned Metrolink stop, quality connections across the site, and a cultural interpretative element.

Any final proposal must incorporate at least one new east-west pedestrian route interlinking to at least two new civic spaces within the block, utilising the existing lane structure for cross connections.”

We refer the Bord to the Masterplan Design Statement, prepared by ACME Architects submitted as part of the application which sets out the frameworks for the redevelopment of the overall land holding. Further detail with regard the Masterplan is set out in Section 6 of the Planning Application Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants . This discusses the masterplan strategy in full detail.

As noted above the Development Plan states that any masterplan proposals should hence incorporate a number of items these are responded to below:

In relation to new pedestrian connections, a new connection to Henry Street from Henry Place in Site 3 (DCC Reg. Ref. 2861/21 refers) currently subject to First and Third Party appeal (ABP Ref. ABP-312603-22).

The proposed development also provides a new street between O’Connell Street Upper and Moore Lane. This links to the public plaza in Site 4 (DCC Reg. Ref. 2862/21) refers, currently subject to First and Third Party appeal (ABP Ref. ABP-312642-22) through to Moore Street.

New connections are proposed between Henry Place to O’Connell Street Upper as part of the proposal for No. 61 O’Connell Street Upper (DCC Reg. Ref. 5432/22) refers currently subject to Third Party appeal (ABP Ref. ABP-318268-23).

It should be noted that a public plaza is proposed in Site 4 (DCC Reg. Ref. 2862/21), currently subject to First and Third Party appeal (ABP Ref. ABP-312642-22). The plaza is located within the heart of the Dublin Central Masterplan and will be highly accessible and is situated directly opposite the future O’Connell Street MetroLink entrance on Moore Lane.

The proposed development provides a range 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 application successfully acknowledges the urban architectural and historical context and successfully promotes the restoration of a significant element of the Upper O’Connell Street streetscape and Heritage –led retention and restoration of all pre-1916 buildings and fabric along Moore Street across the Dublin Central Masterplan. A conservation plan was also prepared for the Dublin Central Masterplan by Molloy & Associates Conservation Architects, as submitted as part of the application, we would refer the Bord to same for details on the architectural and historical context of the Dublin Central Masterplan in its entirety.

In relation to Site 4 specifically, we refer the Bord to Conservation Plan and Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects for Site 4 as submitted as part of the application which respectively describe the existing built environment at Site 4 and consider the impact of the proposed building on the architectural heritage and setting of the site and its surroundings.

The Dublin Central Masterplan considered the relationship with Moore Street providing new active frontage and connections to support the market and thus supporting the principals of SDRA 10.

We refer the Bord to the Outline Construction & Demolition Management Plan and Preliminary Construction Traffic Management Plans, 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.

It is evident from the above that the Dublin Central Masterplan is in line with the guiding principles for Key Opportunity Sites, in this case O'Connell Street/Moore Street/Cultural Hub.

2.9 Chapter 15 – Development Standards

2.9.1 Section 15.4.1 - Healthy Place Making

All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and health communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city as set out in Chapters 4 and 5.

Key principles to consider are:

- *The contribution to the public realm for the benefit and / or enjoyment of the locality.*
- *The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.*
- *The use of high quality materials and finishes including hard and soft landscaping.*
- *The orientation of open space and the accessibility to daylight and sunlight.*
- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.*
- *The accessibility of the development and the traffic calming measures in place in accordance with DMURS.*
- *The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.*
- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.*

2.9.2 Section 15.4.2 Architectural Design Quality

Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin's heritage and local distinctiveness and enriches the city environment. Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.

Through the use of high quality materials and finishes and the appropriate building form, the architectural quality of development should positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment

Key principles:

- *The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.*
- *The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered.*
- *The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting.*
- *The suitability of the proposed design to its intended landuse and the wider land-use character of the area, along with its relationship with and contribution to the public realm.*

- *The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship.*
- *The need to protect and enhance natural features of the site, including trees and any landscape setting.*
- *The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.*
- *The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces.*
- *Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.*

2.9.3 Section 15.4.3 Sustainable and Climate Action

Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.

To minimise the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build.

Key sustainable design principles:

- *Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.*
- *Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain.*
- *Materials should be selected which are sustainably sourced and existing materials reused and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged.*
- *Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10.*
- *Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance – see policy SI25.*
- *New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council's Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23.*
- *For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below.*

2.9.4 Section 15.4.4 Inclusivity and Accessibility

Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.

Within new buildings and spaces, this will include consideration of issues such as provision of level circulation, lifts, doors widths, surface finishes, signs and information.

The historic environment poses particular challenges for fully delivering all-inclusive access, however, there will almost always be scope to improve access for all without compromising the character of an existing structure of special interest.

2.9.5 Section 15.5.1 Brownfield, Regeneration Sites and Large Scale Development

These sites often contain derelict or vacant buildings which are underutilised and in need of redevelopment. Brownfield lands have the ability to regenerate and rejuvenate large portions of the city through redevelopment.

Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development:

- *To encourage innovative, high quality urban design and architectural detail in all new development proposals.*
- *To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- *To respect and enhance existing natural features of interest.*
- *To contribute to the streetscape creating active and vibrant public realm.*
- *To create animation and create activity at street level and vertically throughout the building.*
- *To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- *To ensure land contamination is appropriately dealt with and mitigated against.*
- *To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- *To create new compositions and points of interest.*
- *To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- *To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- *To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*
- *To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
- *Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.*

2.9.6 Section 15.5.4 Height

Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.

The following criteria are noted from Appendix 3:

Dublin Context

There are considered to be three general categories of height in the Dublin Context.

- *Prevailing Height: This is the most commonly occurring height in any given area. It relates the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a schemes legibility.*

- *Locally Higher Buildings:* These are buildings that are significantly higher than their surroundings and are typically up to 50 metres in height. Higher buildings can act as Local or District landmarks.
- *Landmark/Tall Buildings:* A landmark or tall building is one that is a significant intervention in the cityscape and skyline. They are typically located in an area that denotes a specific function such as a public transport interchange or a key urban quarter/ regeneration site. Landmark/tall buildings are typically in excess of 50 metres in height, of exceptional architectural quality, can help people navigate through the City and form memorable reference points.

At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. Opportunities for height will be promoted on sites identified in section 4 below and in accordance with the performance criteria set out in Tables 3 and 4.

Identification of Areas for Increased Height and Density

The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development.

The Building Height Guidelines note that general building heights of at least three to four storeys, coupled with appropriate density in locations outside what is defined as city centre, and which would include suburban areas, must be supported in principle at development plan level. The guidance also states that within the canal ring in Dublin, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of certain criteria.

In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height.

As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3.

Key criteria which all proposals for increased urban scale and height must demonstrate include:

The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040.

- Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.
- Proximity to a range of employment, services and facilities.
- Provision of adequate social and community infrastructure.
- The availability of good walking, cycling and public transport infrastructure.
- Appropriate mix of uses, housing typologies and tenures.
- The provision of high quality public open space and public amenities.
- The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.

- That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.
- Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.
- Adequate infrastructural capacity.

In accordance with SPPR 1, the following locations are identified as generally suitable and appropriate for accommodating a more intensive form of development, including increased height.

City Centre and within the Canal Ring (inner suburbs)

In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities. Where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities.

Proposals for increased height within key sensitive areas of the city including the city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic Georgian core and squares and the canals etc. must demonstrate that they do not have an adverse impact on these sensitive environments and that they make a positive contribution to the historic context. Heights greater than 6 storeys within the Canal Ring will be considered on a case by case basis subject to the performance criteria set out in Table 3.

Masterplan

A design-led approach to optimise density and height is advocated and this should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form. In considering higher density proposals including buildings of enhanced height, international best practice indicates that it is possible to create successful places based around streets and a variety of urban typologies, including houses and medium-rise apartment blocks, as well as some carefully integrated taller buildings. Schemes that use urban typologies of 4 – 8 storeys can create better homes and neighbourhoods at surprisingly high densities, and are more cost-effective than other solutions.

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared. The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publically accessible and private open spaces will fit within the existing and planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open space quantum, sunlight, daylight, visual impact and wind effects. Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan.

Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.

2.9.7 Section 15.5.5 Density

New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity.

Density is further discussed in Appendix 3.

As a general rule, the following density ranges will be supported in the city.

Table 1: Density Ranges

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

2.9.8 Section 15.5.6 Plot Ratio and Site Coverage

Table 2: Indicative Plot Ratio and Site Coverage

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	60-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

2.9.9 Section 15.5.8 Architectural Design Statement

Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23).

2.9.10 Section 15.5.9 Models and Photomontages

In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing or colouring which may distort the reliability of the photomontages should be avoided.

2.9.11 Section 15.6 Green Infrastructure and Landscaping

Planning applications will be required to address climate action as part of the overall design of the development and incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6.

The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following:

- *Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.*
- *The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection.*
- *Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.*

2.9.12 Section 15.7.3 Climate Action and Energy Statement

In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.

The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered as part of the overall design and planning of the proposed development. Having regard to the above, the statement, which shall be prepared by a certified engineer, shall address:

- *the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power*
- *the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems:*
 - *decentralised energy supply systems based on energy from renewable and waste heat sources;*
 - *co-generation (combined heat and power);*
 - *district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources;*
 - *heat pumps;*
 - *include an assessment of embodied energy impacts.*

2.9.13 Section 15.17.5 Shopfront and Façade Design

Shopfront design plays a key part in contribution to the quality of the public realm. Attractive facades and shopfronts have the ability to rejuvenate the streetscape and create an attractive public realm environment.

Shopfront signage should:

- *Be located at fascia level.*
- *In the case of shop blinds, comprise traditional retractable canvas awning signs of Shopfronts and Other Business Premises.*

- The signage relating to any commercial ground floor use should be contained within the fascia board of the shopfront.
- The lettering employed should be either on the fascia, or consist of individually mounted solid letters mounted on the fascia. The size of the lettering used should be in proportion to the depth of the fascia board.
- Signage internal to the premises, including interior suspended advertising panels, which obscure views into the shop or business and create dead frontage onto the street shall not normally be permitted.
- Corporate signs will only be permitted where they are compatible with the character of the building, its materials and colour scheme and those of adjoining buildings.
- Advertisements and signs relating to uses above ground floor level should generally be provided at the entrance to the upper floors, in a form and design which does not detract from or impinge upon the integrity of the ground floor shopfronts, or other elevation features of the building.
- Shopfronts sponsored by commercial brands will generally not be permitted. Proposals for shopfront signage shall have regard to the contents of the Retail Design Manual, 2012, Dublin City Council's Shopfront Design Guide, 2001 and the O'Connell Street Area Shopfront Design Guidelines, 2003,

2.9.14 Car Parking Standards

The application site falls under Zone 1 (Map J of the Development Plan). Policy SMT2 seeks to: -

*"...continue to **promote modal shift** from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport..."*

Land Use	Car Parking Spaces
Hotel	None
Restaurants and Cafes	None
Other Retail and Main Street	1 per 350 sq.m GFA
Apartments	0.5 per dwelling

2.9.15 Bike Parking Standards

The subject site falls under Zone 1 (Map J of the Development Plan). The table below sets out the bicycle parking standards for various uses envisioned as part of a future development proposal (note: this is not an exhaustive list).

Land Use	Long Term Spaces	Short Term Spaces
Hotel	1 per 5 staff	To be determined by the planning authority on case by case basis
Restaurants and Cafes	1 per 5 staff	1 per 10 seats
Retail	1 per 5 staff	1 per 100 sq. m GFA
Apartments	1 per bedroom	1 per two apartments

2.9.16 Applicant's response

Land Use

Under the Dublin City Development Plan 2022 – 2028, as may be seen from the zoning map extract below, the site is subject to the zoning objective, "Z5 – City Centre", in common with much of the city

centre area in the immediate vicinity of the application site. The land use objective for the Z5 zoning seeks: -

“To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.”

Section 14.7.5 of the City Development Plan includes further guidance on Z5 zoned lands. The following points are of note: -

- The primary purpose of this use zone is to sustain life within the centre of the city through intensive mixed-use development.
- The strategy is to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night.
- Ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted. On Category 1 retail streets, retail should be the predominant ground floor use.
- As a balance and in recognition of the growing residential communities in the city centre, adequate noise reduction measures must be incorporated into development, especially mixed-use development, and regard should be given to the hours of operation.

The Development Plan indicates that a wide range of uses is to be provided in this zoning area, which is sustainable and within easy reach of services, open space, facilities and public transport.

The following uses are considered ‘Permissible’ and ‘Open for Consideration’ under the Z5 zoning.

Permissible Uses
Amusement / leisure complex, beauty / grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café / tearoom, childcare facility, civic offices, community facility , conference centre, craft centre / craft shop, creative, artistic, recreational building and uses, cultural / recreational building and uses, cultural , delicatessen, education, embassy office, enterprise centre, financial institution, funeral home, guesthouse, home-based economic activity, hostel (tourist), hotel, industry (light), internet café / call centre, live-work units, media-associated uses, medical and related consultants, mobility hub, nightclub, office , off-licence, off-licence (part), open space, place of public worship, primary health care centre, public house, public service installation, recycling facility, residential, restaurant , science and technology-based industry, shop (district), shop (local), shop (major comparison), shop (neighbourhood) , sports facility and recreational uses, student accommodation, take-away, training centre, veterinary surgery, warehousing (retail/non-food) / retail park.
Open for Consideration Uses
Advertisement and advertising structures, betting office, Build to Rent residential, car park, car trading, civic and amenity / recycling centre, household fuel depot, laundromat, motor sales showroom, outdoor poster advertising, petrol station, postal hotel / motel, transport depot.
SLA Emphasis added.

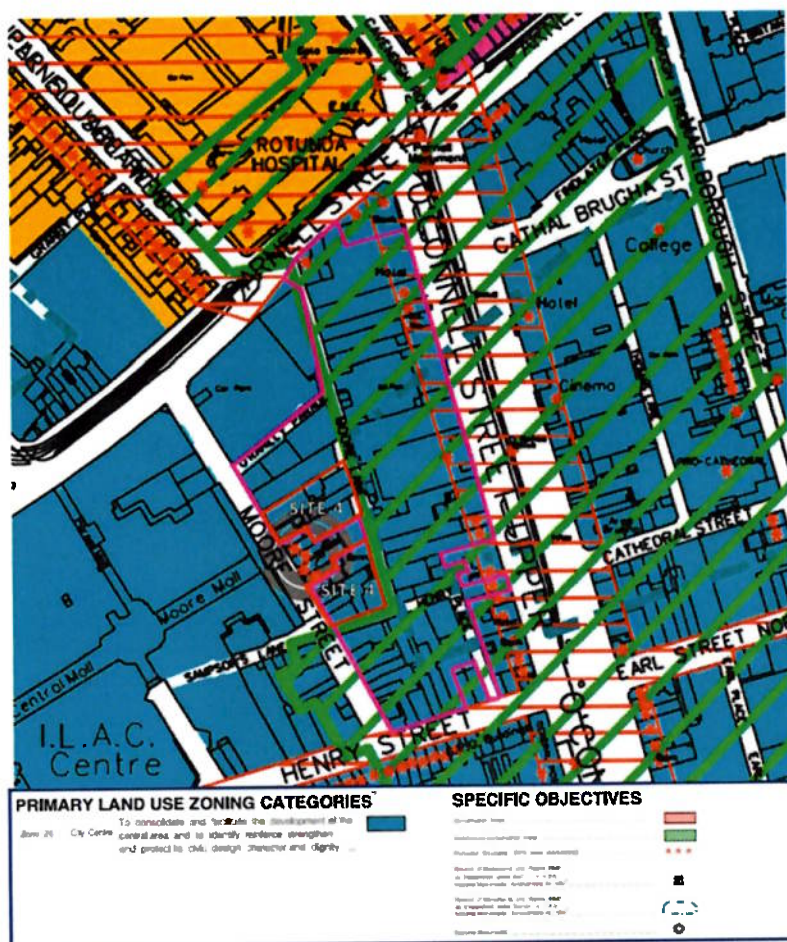


Figure 2: Extract from Map E of the Dublin City Development Plan 2022 – 2028 with Site 4 marked with a red star and the masterplan in purple. Please refer to Architects Drawings for definitive site outlines including offsite work for facilitate construction activities and infrastructural works.

Site 4 comprises retail, café / restaurant, residential, and office uses, which are all permissible in principle under the Z5 zoning.

The scheme 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, café / restaurant uses at ground and first floor levels, complemented by residential use at upper floors.

The proposed development provides for 11no. retail units (c. 617 sq. m). Retail uses are spread across a mix of retail typologies in the form of medium sized units and smaller shop units. These typologies are strategically placed to influence pedestrian movement routes through the streets, as well as creating a vibrant mixed-use environment with character and active frontages.

For the proposed retail units we are seeking greater flexibility for the first occupant of each of these units. In order to enhance and evolve the city centre experience and attract more customers and visitors, particularly in the wake of the Covid-19 pandemic, we are inviting the Bord to grant permission for the range of uses stated on the planning notice (i.e. retail unit for use as 'shop' or 'licensed restaurant / café with take away / collection facilities) and to apply a reasonable condition to the effect that the details of the occupant / end user of any of these units would be agreed in writing with the Planning Authority prior to the first occupation of the unit. Thereafter, future changes of use, where not otherwise exempted, would require planning permission.

2no. café/restaurant units are proposed to provide a variety of dining and leisure opportunities. This includes a ground floor unit fronting the new street and a rooftop restaurant at the 8th floor of the hotel

building. Again, in the interests of flexibility in the wake of the Covid-19 experience, we are requesting that take out and collection facilities be a permitted part of these facilities. Where the licensing of restaurant / café uses is now a planning function, we are also requesting planning permission for this aspect of the proposed use.

Residential use is acceptable in principle and promoted to activate the use of upper floors within the City Centre. The delivery of 15no. apartment units, associated external private and communal amenity open spaces. In meeting the relevant residential design standards of the City Development Plan and/or the SPPRs contained in relevant Ministerial Guidelines for sustainable residential development in urban areas, as described elsewhere in this report, the proposed residential development will enhance the range of accommodation available in the City Centre. Here, prospective residents are within easy reach of a wide range of facilities such as shops, employment, education, leisure, and amenities, accessible on foot and by public transport.

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.

The scheme 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.

A mix of retail typologies is proposed in the form of medium sized units and smaller shop units. These are strategically placed to influence pedestrian movement routes through the streets, as well as creating a vibrant mixed-use environment with character and active frontages.

Place Making

It is an ambition of the Dublin Central Masterplan to secure well-designed public realm that drives footfall, increases dwell time and provides commercialisation opportunities.

The scale and massing of Site 4, broken down into defined blocks with familiar street frontages, will accommodate the viable mix of uses required to drive this regeneration and dynamic placemaking within the north inner city.

The Masterplan is divided into independent sites designed by several architectural practices to ensure appropriately varied design and visual appearance. The design of each Site will adhere to the common principles set down in the Masterplan to ensure overall coherence and coordinated place-making in the regeneration at this prominent and visually sensitive city centre location.

Two new connecting streets or laneways, a small pocket square and a larger public square are introduced into the existing monolithic nature of the three city blocks which compose the Dublin Central site. These interventions breakdown block scale, encourage through movement and enable a higher level of access across the site. The resultant more intimate block pattern has fewer unrelieved or unrelenting façades, avoiding “uninterrupted walls of building”. The objective is create a visually stimulating city environment full of interest and building detail. We refer the Bord to The Masterplan Design Statement, prepared by ACME as submitted as part of the application for further details in relation to placemaking across the Dublin Central Masterplan.

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.

Design Quality

It is an ambition of the Dublin Central Masterplan to deliver a world class City Quarter that site respectfully within its context, utilising its location and heritage features. Drive long term value provision of high quality commercial and retail space. The Dublin Central Masterplan, including Site 4, incorporates high quality, contemporary design whilst also acknowledging the need to incorporate the quality historical elements.

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.

The overall design of Dublin Central took in to consideration the existing context and the scale and pattern of the existing streets, and it respects and enhances the areas architectural assets whilst creating a number of new landmark features.

Climate Action

The applicant has a strong track record of sensitive urban regeneration projects, including those in historic city centres, such as Bishopsgate development located in Spitalfields in London. In 2017 Hammerson became the first real estate company globally to launch a comprehensive Net Positive strategy covering both environmental and socio-economic impacts. The team has worked hard to ensure resource efficiency, climate risk and health and wellbeing considerations were embedded at the outset of the Dublin Central design process.

It should be noted that the planning application was accompanied by a comprehensive EIAR which assessed the Masterplan as well as each individual sites.

The Landscape Masterplan, prepared by Gross Max Landscape Architects for the overall Dublin Central Masterplan is guided by an overall design vision which follows 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.

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 Bord 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 align with the requirements set out above. It notes *“The report provides information on the exemplary environmental performance that is proposed for the design, construction and operation of the ‘Dublin Central Masterplan’ and specifically the development of ‘Site 4’.”*

Furthermore, the energy efficiency measures to be adapted in the proposed development will assist in achieving the target set out in the Climate Action Plan 2024 to reduce carbon emissions within the built environment.

The planning application has been designed to be Ireland's first Net Zero Carbon schemes, the design maximises sustainable energy uses, materials, uses appropriate SuDS measures throughout and enhances biodiversity of the urban block.

Inclusivity

The 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. Site 4 has been designed with support from OHAC, to comply with DAC guidelines and current best practice. This includes level thresholds to all entrances, lift access to all first floor, and fully compliant apartment plans except for the units within retained existing fabric. We refer the Bord to the Design Statement for Site 4 prepared by ACME as submitted as part of the application which addresses Inclusivity.

Regeneration

In the first instance we refer the Bord to section 2.8 of this response which addresses regeneration in detail.

The Dublin Central masterplan is a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape and creates new points of interest in the area.

The Applicant has appointed a world class design team, led by ACME Architects as Masterplan Architect, to help realise its vision for the redevelopment and regeneration of this key city centre site.

This conservation approach seeks to ensure that 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 premier shopping streets. It seeks to strike an appropriate balance between the conservation of a representative collection of 19th and 20th century buildings and the provision of high quality retail, residential, hotel, café / restaurant and cultural floor space that will drive the regeneration and active use of this significant city centre location. The general appearance, the historic uses and associations are largely maintained, particularly along Moore Street.

Site 4 is consistent with the national policy objectives of the NPF in achieving sustainable mixed-use development (including residential, retail, café / restaurant, hotel and cultural uses) appropriate to the regeneration and rejuvenation of this city block at the junction of Henry Street and Moore Street, and the wider Masterplan, in the heart of Dublin City Centre.

Height

The proposed design is divided into 2no. urban blocks, separated by Nos. 14-17 Moore Street, a National Monument and Protected Structure. The proposed new public plaza will be permeable for pedestrians and dismounted cyclists (and capable of accommodating emergency and servicing vehicles). This will create a link between O'Connell Street and Moore Street and the wider Masterplan area. This simple urban design intervention, allied to an appealing use-mix and the locating of a future Metrolink Station within the overall Dublin Central site, will encourage pedestrian movement to filter through the streets and lanes, revitalising and shifting the centre of activity northwards. It will also serve to strengthen the connection between Parnell Square, and its incipient "cultural quarter", recently allocated significant Urban Regeneration Development Fund (URDF) funding.

The buildings heights in Site 4 range from Nos. 1 – 3 storeys over existing separated single storey basements in line with the existing built form on Moore Street and Moore Lane and are therefore in accordance with the prevailing building height in the area. As a result, there is no requirement to consider criteria for enhanced building heights in this case. The parapet height set by the National Monument (Nos. 14 – 17 Moore Street) is maintained. In line with this, No. 10 and Nos. 20 – 21 Moore Street are proposed to be retained and Nos. 11 – 13 will be replaced by a terrace of 3no. three storey

high buildings with pitched roofs and gables, matching the National Monument. The proposed building heights addressing Moore Lane are predominantly 1 and 2 storeys in line with the existing buildings being retained (Nos. 17 – 18 Henry Place and Nos. 6 – 7 Moore Lane) as part of the proposed development. The lower building heights here also contributes to maintaining the proportions characteristics of the existing lane.

The design and layout of the proposed development has been informed by the surrounding context and on-site constraints. The layout responds to the immediate context and character of the streets which adjoin the proposed development. It also has regard to the aspirations and context of the wider Dublin Central Masterplan which accompanies the application.

The built form of the proposed development responds to its historical context in a respectful and complimentary manner. The architectural design seek to regenerate and refurbish any existing building fabric where possible. Where new buildings are proposed, they seek to replicate the architectural design of the existing buildings and in particular nos. 14-17 Moore Street, National Monument and Protected Structures.

Density

15no. residential apartments are proposed. based on a net site area of approximately 0.26 ha, this amounts to a density of approximately 56no. units per ha. Having regard to the constrained nature of this site, with protected structures and proximity to a national monument to contend with, it is submitted that a density that is in excess of 50 units per Ha represents a sustainable form of residential development in this context.

The proposed development will make a positive contribution to addressing current shortfall in housing within the city in accordance Policies . It is consistent with the identification at strategic planning policy levels of the need for dwellings to meet the needs of smaller households in Dublin City.

This is critical to attracting workers and sustaining employment, to drive and the City's economy. It will enhance the range of high quality accommodation options in the City Centre for the working population and reduce the need for unsustainable commuting.

RSES Regional Policy Objective (RPO 4.3) specifies that infill/brownfield sites within the existing built up area of Dublin should provide "*high density and people intensive uses*" (see also Policy QH8). Section 5.8 of the DEHGL Guidelines on Sustainable Residential Development in Urban Areas (2009) sets out that sites proximate to a transport hub are expected to achieve a minimum density of 50 units per hectare.

The more recently published Apartment Guidelines also promote higher residential densities (in excess of 50no. units per Ha) to create a compact urban form at central or accessible urban locations and encourage the use of sustainable forms of transport. High density and higher building height are particularly promoted in central, accessible locations and locations with high frequency, high capacity public transport options, such as the subject site. The proposed development provides critical mass of residential development to support local facilities and investment in public infrastructure. See Section 8.8.6 for discussion on how the proposed development is consistent with these Guidelines.

Plot Ratio & Site Coverage

The plot ratio of the proposed scheme is 1.24. This rate of plot ratio is below the indicative standard for this area set out in the Development Plan and is due to the constrained nature of this site, with protected structures and proximity to a national monument. The Bord will note that the plot ratio for the Dublin Central Masterplan as a whole exceeds the indicative standard in this case.

The site coverage of the proposed scheme is c. 59.5%. This is above the indicate standard for a Regeneration Area and marginally below the indicate standard for the City Centre (ie 60%), but could be considered to be substantially compliant in that regard.

We respectfully submit to the Bord that Site 4 has a lower site coverage due to the higher quantum of public open space proposed. 1,155 sq. m of public open space is provided at Site 4 in the form of a new public plaza. This represents slightly over a third of the entire red line boundary area.

Thereafter we refer Bord to the other standards of residential design and amenity that the proposed development achieves, as highlighted in this report and the plans and schedules that accompany this application.

Unit Mix

It is acknowledged that the Housing Needs Demand Assessment contained in the City Development Plan 2022-2028 makes provision for a certain unit mix being required in certain parts of the City. The North Inner City is one such location. In that regard, Section 15.9.1 states

To require planning applications that include residential accommodation of 15 residential units for more in the North Inner City and Liberties Sub-City Areas (as per Figure 1.2 as part of Appendix 01, Annex 3) include the following mix of units:

- *A minimum of 15% three or more bedroom units.*
- *A maximum of 25%-30% one bedroom / studio units.*

We note that Section 15.9.1 confirms that the HDNA had identified an increased demand for two and three person households.

Site 4 is located within the North Inner City area as defined by Figure 1-2 of Annex 3 of Appendix 1 of the City Development Plan 2022-2028. The development in this case provides for 15 no. residential units and just falls within the requirements above. This mix of units provided amounts to the following:-

Type	No. of Units	%
1-Bed	9	60%
2-Bed (3P)	3	20%
2-Bed (4P)	3	20%
Total	15	100%

It can be seen from the above that 20% of the units, or 3 units, provide for a larger form of residential accommodation and that the 1 bed proportion is at 60%. It is acknowledged that this does not strictly meet the unit mix requirements above. The Bord 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 the proposed refurbishment of these buildings that is proposed in this case.

In that regard, the Bord will note that Section 15.9.1 of the City Development Plan goes on to acknowledge that SPPR 2 of the Apartment Guidelines provides some flexibility in terms of unit mix for building refurbishment schemes in sites of any size.

SPPR 2 states as follows:-

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*

- For schemes of 50 or more units, SPPR 1 shall apply to the entire development;

All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.

There are a number of points to consider. The first is that were this a scheme of just 9 units, there would be no restriction on unit mix in any event under these Guidelines.

According to the second bullet point, units 10-15 in this case are subject to SPPR 1 of the Guidelines, with units 1-9 not being restricted in respect of unit mix in any way. SPPR 1 requires that there be no more than 50% 1 bedroom/studio units. If Units 1-9 were allocated as being the 9 no. 1 bedroom units, the remaining 6 no. units (all 2 bedroom units), would be compliant with SPPR 1. The Bord's attention is drawn to the fact the 67% of the 15 no. units are oversized (10. no. units), which is significantly above the minimum of greater than 50% required and demonstrates the overall high quality of residential accommodation provided in this case.

As the scheme is not greater than 50 units, the third bullet is not relevant in this case.

We therefore consider that the development as proposed can be considered consistent with the provisions of Section 15.9.1 of the City Development Plan, to SPPR 2 of the Apartment Guidelines and are otherwise providing a high quality level of residential development here. We also remind the Bord that in addition to the above, having regard to the provision of SPPR 2 noted above, the Bord also has scope to exercise discretion on a case-by-case basis in the context of such refurbishment schemes and note that this is also referred to in Section 15.9.1 of the City Development Plan.

Alternatively, the Bord are invited to attach a Condition to any grant of permission in this case to amalgamate 2 no. of the 1 bedroom units in No. 20-21 Moore Street to create a further larger dwelling unit. In so doing, the number of units overall will fall below 15 no. units and the requirements of Section 15.9.1 will no longer apply to this development. The development would otherwise remain consistent with the Apartment Guidelines.

Design Statement

We refer the Bord to the Design Statement for Site 4 prepared by ACME Architects and the ACME Masterplan Design Statement for the entire Dublin Central Site.

Model and Photomontages

An architectural model was submitted to Dublin City Council, providing further information on the Site 4 proposal in the context of the Dublin Central Masterplan. This is now at the offices of An Bord Pleanála.

We refer the Bord to the Photomontages enclosed in the EIAR as submitted with the planning application for Site 4 prepared by ARC.

Green Infrastructure

We refer the Bord to the response on Climate Action response above. The landscape of the Dublin Central site has informed the overall landscaping plans for the area. The scheme provides good connectivity and enhances biodiversity.

Shopfront Design

We would highlight that individual shopfront signage cannot be determined until tenants are secured. Therefore, a general shopfront strategy has been devised by ACME Architects. We refer to the Masterplan Design Statement, prepared by ACME Architects for shopfront and signage design principles as submitted as part of the application.

We would request that the Bord attaches a condition similar to the one in the decision to grant permission from Dublin City Council, Condition 18 which states the following:

"A scheme of shopfront design, including any associated signage, lettering, lighting or internal security screens, shall be submitted to the planning authority for written agreement before the development commences."

We also refer the Bord to Section 4.7 – Building Character, Appearance and Materials and Section 4.8 – Shopfronts in the Site 4 Design Statement, and also to Appendix 4 of the Dublin Central Masterplan Design Statement, each prepared by ACME and submitted with the planning application. The architectural treatment of shopfronts in this scheme has been carefully considered to closely reflect the character of adjoining shopfronts within the O'Connell Street Architectural Conservation Area.

Car and Bike Parking

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 Bord 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.

The Applicant is proposing to provide 44no. bicycle parking spaces. Site 4 therefore provides for bicycle parking which exceeds the minimum requirements outlined in the Development Plan.

Resident's cycle parking is provided in the form of a secure cycle storage, one located in the block to the north of the National Monument and one located in the block to the south of the National Monument. Cycle parking is provided at a rate of 1no. space per unit for the residential units located to the north of the National Monument. Cycle parking is provided at a rate of 1 no. per bedroom for the units located in the block to the south of the National Monument.

For further details, we refer the Bord to the enclosed Traffic Assessment and Travel Plan, prepared by Waterman Moylan Consulting Engineers in respect bicycle parking provision.

We refer the Bord to the Masterplan Design Statement, prepared by ACME as part of the application which details the overall cycle and car parking provision for the entire masterplan.

A small basement car park with approximately 33 spaces is located in Site 2 accessed from the north end of Moore Lane, where the road is 24 hour use, this will be for buildings within site 2 of the Masterplan. An additional accessible parking bay is located on O'Rahilly Parade. Several locations of short-term on-street cycle parking are proposed throughout the masterplan area. These will provide a limited number of spaces on the public square as well as in the southern part of the Masterplan area towards Henry Street. The cycle stands have been positioned to be easily accessible while reducing clutter and avoiding pedestrian desire lines. Each building provides cycle parking for the residents or workers, in discrete secure locations which will operate independently of each other and of the public cycle parking.

3 CONCLUSION

The proposed development has been carefully conceived, having regard to the statutory planning context, to the specific context and character of the site and to the potential development at the surrounding regeneration areas.

The proposal currently before the Bord has been the subject of in-depth assessment by both the Applicant and Dublin City Council.

It remains our opinion that the proposed development is compliant with the Government and Dublin City Council policy guidance on strategic regeneration development in city centre locations. This includes the policies, objectives and design standards for mixed-use development in close proximity to several public transport nodes, to cater for a recognised demand for residential, retail, retail service, hotel and cultural uses.

We would continue to maintain that the proposed development represents a well-considered design and layout that responds appropriately to context and is sympathetic to historic context and the ACA, neighbouring protected structures in terms building height, form and materials. No significant adverse planning impacts or long term environmental effects are predicted arising from the proposed development.

We trust that the Bord will see fit to uphold the Council's decision to grant permission for the proposed development. This is appropriate on the grounds that: -

- Site 4 helps to realise the ambition for the overall Dublin Central site, referred to as the 'Key Opportunity Site 1' in SDRA 10 – North East Inner City of the City Development Plan.
- Site 4 represents an exceptional opportunity to provide a mixed use development that will act as a catalyst for the regeneration of O'Connell Street and will result in a radical, empathetic and positive impact upon the social and economic framework of the north inner city.
- Site 4 is located on a prominent site from a citywide perspective.
- Site 4 successfully integrates existing built fabric of architectural and cultural heritage interest with contemporary and innovative design, within an ACA.
- Site 4 complies with the zoning objectives of the site. It provides vibrant, mixed use development on lands zoned 'Z5' use.
- Site 4 will provide additional amenities including complimentary retail and café / restaurant floorspaces which will provide wider variety a diversity of attraction in the retail core.
- Site 4 increases activity on Henry Place and Moore Lane, including access to the high quality retail and residential units and provides a new public plaza linking Moore Street with Moore Lane and O'Connell Street which will contribute to the overall regeneration of the area as a result of increased footfall.
- The site is exceptionally well served by high frequency, high capacity bus and rail services.
- Site 4, including the Masterplan, has been subject of comprehensive design and environmental assessment, Appropriate Assessment Screening and an Environmental Impact Assessment Report, to ensure that it is representative of sustainable mixed-use development that meets the needs of existing and future generations.
- Site 4 consolidates growth within Dublin city, providing a development with a sustainable density which utilises a site which is underutilised / brownfield.
- Through offering a more dynamic retail, café / restaurant 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 live, shop, work and socialise during the day and at night time.
- Residential apartments are included in the mix of uses, which is appropriate to delivering housing and in particular secure long term rental accommodation in the city centre.

- A sensitive design approach, the conservation and adaption of buildings of heritage significance, provision of retail, cultural, café / restaurant, residential and use, balanced with the reasonable protection of the architectural and civic character of the surrounding area, in accordance with the objectives of the current Dublin City Development Plan and the proper planning and development of the area.
- The design approach achieves optimum use of a site which has its own inherent constraints. The proposal will contribute to the creation of a dynamic, mixed-use development in this strategic urban regeneration site.
- Site 4 is consistent with national, regional and local strategic planning policy as expressed in the National Planning Framework, Regional Spatial and Economic Strategy (and Dublin Metropolitan Strategic Plan), the Core Strategy of the Development Plan and all the relevant Ministerial Guidelines, and otherwise with the statutory policies and objectives of the Dublin City Development Plan.

STEPHEN LITTLE & ASSOCIATES

11 January 2024

Enclosures

1. 17-18 Henry Place, report from DCC Conservation Section, 29 June 2022
2. 10 Moore Street, report from DCC Conservation Section, 29 June 2022
3. 12 Moore Street, report from DCC Conservation Section, 29 June 2022
4. 13 Moore Street, report from DCC Conservation Section, 29 June 2022
5. 20-21 Moore Street, report from DCC Conservation Section, 29 June 2022

