

File With \_\_\_\_\_

## SECTION 131 FORM

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

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 \_\_\_\_\_

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

to: \_\_\_\_\_ Task No: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

EO: \_\_\_\_\_

Date: \_\_\_\_\_

AA: \_\_\_\_\_

Date: \_\_\_\_\_

File With \_\_\_\_\_

## CORRESPONDENCE FORM

Appeal No: ABP 312642-22

M \_\_\_\_\_

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

1. Update database with new agent for Applicant/Appellant \_\_\_\_\_

2. Acknowledge with BP 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

Shane Stokes Response  
to S131

## 4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☒

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Litz Clerk</u>	AA: <u>Cathy Carleton</u>
Date: <u>15/02/23</u>	Date: <u>15/02/24</u>

Lisa

**Karen Hickey**

---

**From:** Bord  
**Sent:** Tuesday 13 February 2024 09:21  
**To:** Appeals2  
**Subject:** FW: invited further comments in relation to ABP case number: 312642-22 Planning authority reference number: 2862/21  
**Attachments:** ABP312642-22PA ref 286221 February 24.docx

**From:** Shane Stokes <[REDACTED]>  
**Sent:** Monday, February 12, 2024 5:31 PM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** Fwd: invited further comments in relation to ABP case number: 312642-22 Planning authority reference number: 2862/21

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

Hi folks, please find enclosed the submission.

Thank you,

Shane Stokes

Glencastle  
Season Park  
Newtownmountkennedy  
Co. Wicklow  
A63A500

12/2/24

Ref:

ABP case number: 312642-22

Planning authority reference number: 2862/21

To whom it may concern:

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I note the Moore Street Preservation Trust's references to the Dublin City Development Plan 2022 – 2028. I will comment on each of these in turn:

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and value of these places in defining and giving character and meaning to the city is even more relevant, making Dublin a rich and culturally diverse city.'

Moore Street and its surrounding are an unmistakable part of Dublin culture and should be restored and enhanced by the State rather than erased as part of a large scale commercial development.

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There are many other sites in the city which aren't as historically, culturally and politically sensitive, and these are more fitting for a development such as that being applied for.

Similarly, objectives 7.5.6 Food and Beverage Sector/Markets and CCUV34 Moore Street Markets are clear in the stated policy and objectives of the Dublin City Council under the current Dublin City Development Plan 2022-2028, and have very clear goals for the preservation and protection of this area.

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This submission makes a number of important points in underlining how the proposed development is at variance to the Dublin City Development Plan 2022-2028.

The section Chapter 4 underlines clashes between the proposed development and the Dublin City Development Plan in relation to goals of integration and connectivity, as well as inclusivity and being culturally vibrant.

The section Chapter 5 includes concerns about a lack of social housing and communal solidarity, and chapter 6 highlights concerns that the proposed development would not be the correct way to achieve the goals of regeneration, fostering local economic development and social enterprise.

I believe an alternative plan such as that unveiled in 2021 by the Moore Street Preservation Trust and the 1916 Relatives Alliance would better serve the area and also show greater sensitivity and accordance with the Dublin City Development Plan.

I believe the section Chapter 7 makes valid points about the area currently being an urban village and an important market street, albeit one which would function better if it was protected and enhanced rather than allowed to fall into disrepair. It also underlies concerns about the lack of a theatre, pubs and family leisure facilities.

I would like to add to this that markets are themselves an identifiable and recognisable part of inner city Dublin culture and heritage, and that those in the Moore Street area have been in existence since the 18<sup>th</sup> century. There is a long-running link to the history of the city and one which I believe should be preserved.

Chapter 8 expresses concerns about safety, including after hours. Chapter 11 identifies many important built history and archaeological features which are threatened by the development. It notes that the Hammerson plans 'show no acknowledgement of historical or architectural importance of built heritage, much less conservation and commemoration plans anywhere in the Moore Street/Moore Land/Henry Place area.'

I have similar concerns. I believe the primary goal of a company such as Hammerson is to maximise profit, and that this has determined the nature and shape of its proposed development. However this area is so historically and culturally important that a far more respectful and sensitive approach is warranted.

The developer does not show due consideration for Irish history and local heritage in what is one of the most politically, historically and culturally-sensitive areas in the city

The manner in which buildings have been allowed degenerate in recent years illustrate this. I believe that the buildings on Moore Street have been treated like an inconvenience despite concerted efforts to underline their importance, including by stakeholders, councillors, a high court judge and others.

This is an area of huge significance and historical sensitivity and removing it to facilitate yet another collection of retail units would be a serious mistake.

Dublin's history is being eroded all the time, with fewer and fewer historical buildings and areas remaining in the city.

Chapter 12 expresses important concerns about culture, heritage and history, pointing out the range of activities that have been promoted and held in the area in recent decades, and noting the historical tours which regularly take place in Moore Street and its environs.

I believe this area allows us—and those originating from outside Ireland who are living here or visiting here—to have an important glimpse into our history, our past way of living and our culture. There is a real danger that this could be lost to a generic collection of retail units which can be seen in countless cities, and which add nothing in terms of placemaking.

The sections titled Chapters 13 and 15 also express valid concerns.

This submission leads me to a number of conclusions. I believe this area does need enhancement, but that this can happen if the current neglect is removed and an effort is made to revitalise the area without erasing its rich values and history.

I believe these sensitive areas should perhaps be State owned and planned with vision and ambition which is respectful of Dublin's and Ireland's past.

Dublin offers less and less history to visitors, with vast swathes of historically important buildings being lost over the decades.

A shopping centre will do nothing for tourism or the appreciation of our past. But instead cherishing that past will provide a big tourism draw, a greater appreciation of what it means to be Irish, and an understanding of how we have been shaped by our history and our challenges.

History should not be erased, and neither should this area of Dublin.

If something as historically significant as 1916 is allowed to fade from visibility, we lose our identity and an understanding of the kind of society the proclamation aspired to build for this country.

I believe that An Bord Pleanála has a once-in-a-generation chance to safeguard one of the most important locations from Ireland's past, an area of Dublin which can educate, inform and inspire if properly preserved.

I believe the alternative would be a disservice to the city. Who will celebrate a collection of commercial units in 20, 30, 40, 50 or 100 years?

Dublin is a large city; few of its areas are so rich in importance.

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I note reference to the National Museum's description of the area as 'the most important historic site in modern Irish history' and would ask An Bord Pleanála to give this serious consideration in assessing the proposed development. This not a standard brownfield site, but rather one of significant historical and cultural importance.

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As with other submissions above, I note and welcome the call by councillors for the listing of the terrace in its entirety, as well as the support of other groups mentioned in the opening section of this submission.

I note the validity of points made in connection with the Dublin City Development Plan 2022 – 2028, including 12.5.2 Cultural Hub and Quarters, CU 7 – Cultural Clusters, CU 9 – North Inner City, CU 09 – 14 to 17 Moore Street, CCUV 34 – The Moore Street Market.

I agree with the argument that a 1916 Cultural Historic Quarter better serves Dublin than another shopping precinct, and that this could be done along the lines of Temple Bar with particular emphasis on enhancing culture.

I also agree with the concerns expressed that the existing 1916 National Monument of 14 to 17 Moore Street is not sufficient to stand in isolation and that the principles of the Venice Charter should apply.

Preserving four buildings only is not enough; the addition of other structures to the RPS is commendable.

Similarly, I agree with that the points made about the proposed development not meeting the requirements of the Dublin Development Plan, and about the applications not taking on board the findings of the High Court and the Court of Appeal in relation to the criteria for the protection and preservation of a national monument.

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I also am in agreement that the protective references incorporated into the Dublin City Development Plan 2022 – 2028 by Dublin's Councillors relating to the buildings and adjoining laneways on Moore Street should be

on board when considering this appeal, as well as the mention of a cultural hub and quarter incorporating O'Connell Street, Parnell Square and Moore Street.

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I disagree with the statement in paragraph two that the adoption of the Dublin City Development Plan 2022-2028 does not jar with the proposed development; in fact, any reading of the Development Plan reveals numerous clashes between what is proposed and with that development plan.

In that same paragraph I note the reference to dereliction. I believe there is an irony that, under current ownership, not enough has been done to protect the structures on and around Moore Street from dereliction.

I believe that dereliction can and would be addressed by the recognition that many buildings have been placed on the RPS, and feel that safeguarding these buildings rather than tearing them down is the solution.

I believe it is ironic that this submission talks about the shortfall in tourism compared to the south side of the city. The development would result in the removal of a site of significant historical and cultural interest, which would only further increase the imbalance in tourism between both sides of the Liffey. Instead, I believe that affording this site the proper protection and promotion as a historical quarter would be a very considerable tourism draw, and would do far more to rectify the imbalance than the construction of a modern-day shopping precinct.

In the section Chapter 4, I believe it is not credible to state that the 'proposals are sympathetic to the city's history and character and with the district's architectural heritage.' Indeed the opposite is the case.

In Chapter 6, the point is again made about the disparity between tourism on the north and south sides of the city. I would suggest that you don't attract tourists by obliterating history and culture.

For this reason, I believe the argument in Chapter 7 advocating for retail is not sufficient to remove such important structures as those in the Moore Street area.

I note that the observation relating to Chapter 11 is just one line in length, the shortest of the submitted observations in this document. I believe this is because that statement that the 'proposed building design is consistent and sympathetic with the general area's architectural heritage' is highly inaccurate.

I believe any reading of this section of the Dublin City Development Plan 2022 – 2028 shows numerous clashes between the stated policies and what is planned for this proposed development. The development as is would be entirely detrimental to built heritage and archaeology, and to suggest otherwise is clearly not the case.

Chapter 12 relates to culture; as stated elsewhere in this submission, I believe the Moore Street area and its surrounds are an important part of Dublin's culture, and that removing these buildings and the markets would equate to a net loss.

The section chapter 13 asserts that 'care has been given to protecting the historical buildings which played a role in the 1916 rising.' I am in agreement with Dublin's councillors and other submissions cited above which argue that preserving numbers 14-17 on Moore Street is simply not sufficient.

As a whole, I believe this submission places undue emphasis on profit and commercial gain and not enough on the history, heritage and culture which would be lost if the applicant's plans are allowed to proceed.

#### **Submission by Stephen Little and Associates:**

Work-related time constraints prevent me from being able to discuss this submission as much as I would like.

I would like to refer Bord Pleanála to my previous submissions on 4 March 2022 and on 11 January 2024 as to my thoughts on the planned development. Of particular relevance are the numerous points which I feel are in contravention of the Dublin City Development Plan 2022 – 2028, as discussed in the submission made this January.

I also believe the submissions by others (as discussed by me in this observation) include many important points which also respond to the applicant's proposed development, and would ask that these and also the wishes of Dublin's democratically-elected councillors are given serious consideration by An Bord Pleanála.

I believe the National Museum's description of the area as 'the most important historic site in modern Irish history' is hugely important and that this should be preserved for current and future generations. There are many brownfield sites across the city, but there are few locations which are as important to Ireland and its people as this one.

To address a specific point made in the submission by Stephen Little and Associates: I believe it does not make sense to point out that a number of the buildings on Moore Street and surrounding areas suffered damage during 1916, and to argue that this should prevent their preservation.

The whole rationale for preserving Moore Street and the surrounding areas is precisely that they were a battleground site of huge historical importance.

Damage is inevitable in such a context; the fact that damage was incurred should, I believe, not be a reason for this area to be deemed unworthy of preservation.

Even if damaged buildings were repaired or restored in the years afterwards, that remains a direct repercussion of a vital event in the State's history, and is intrinsically connected to that event.

Thank you for your consideration of these points. I believe that this proposed development would be detrimental to this area and to Dublin in general.

I hope that you will take and my previous submissions into account when determining this case.

Kind regards,

Shane Stokes

Lisa

**Karen Hickey**

---

**From:** Bord  
**Sent:** Tuesday 13 February 2024 09:21  
**To:** Appeals2  
**Subject:** FW: invited further comments in relation to ABP case number: 312603-22 Planning authority reference number: 2861/21  
**Attachments:** ABP312642-22PA ref 286221 February 24.docx

-----Original Message-----

From: Shane Stokes [REDACTED]  
Sent: Monday, February 12, 2024 5:30 PM  
To: Bord <bord@pleanala.ie>  
Subject: invited further comments in relation to ABP case number: 312603-22 Planning authority reference number: 2861/21

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

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Shane Stokes

Glencastle  
Season Park  
Newtownmountkennedy  
Co. Wicklow  
A63A500

12/2/24

Ref:

ABP case number: 312642-22

Planning authority reference number: 2862/21

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In the section Chapter 4, I believe it is not credible to state that the 'proposals are sympathetic to the city's history and character and with the district's architectural heritage.' Indeed the opposite is the case.

In Chapter 6, the point is again made about the disparity between tourism on the north and south sides of the city. I would suggest that you don't attract tourists by obliterating history and culture.

For this reason, I believe the argument in Chapter 7 advocating for retail is not sufficient to remove such important structures as those in the Moore Street area.

I note that the observation relating to Chapter 11 is just one line in length, the shortest of the submitted observations in this document. I believe this is because that statement that the 'proposed building design is consistent and sympathetic with the general area's architectural heritage' is highly inaccurate.

I believe any reading of this section of the Dublin City Development Plan 2022 – 2028 shows numerous clashes between the stated policies and what is planned for this proposed development. The development as is would be entirely detrimental to built heritage and archaeology, and to suggest otherwise is clearly not the case.

Chapter 12 relates to culture; as stated elsewhere in this submission, I believe the Moore Street area and its surrounds are an important part of Dublin's culture, and that removing these buildings and the markets would equate to a net loss.

The section chapter 13 asserts that 'care has been given to protecting the historical buildings which played a role in the 1916 rising.' I am in agreement with Dublin's councillors and other submissions cited above which argue that preserving numbers 14-17 on Moore Street is simply not sufficient.

As a whole, I believe this submission places undue emphasis on profit and commercial gain and not enough on the history, heritage and culture which would be lost if the applicant's plans are allowed to proceed.

#### **Submission by Stephen Little and Associates:**

Work-related time constraints prevent me from being able to discuss this submission as much as I would like.

I would like to refer Bord Pleanála to my previous submissions on 4 March 2022 and on 11 January 2024 as to my thoughts on the planned development. Of particular relevance are the numerous points which I feel are in contravention of the Dublin City Development Plan 2022 – 2028, as discussed in the submission made this January.

I also believe the submissions by others (as discussed by me in this observation) include many important points which also respond to the applicant's proposed development, and would ask that these and also the wishes of Dublin's democratically-elected councillors are given serious consideration by An Bord Pleanála.

I believe the National Museum's description of the area as 'the most important historic site in modern Irish history' is hugely important and that this should be preserved for current and future generations. There are many brownfield sites across the city, but there are few locations which are as important to Ireland and its people as this one.

To address a specific point made in the submission by Stephen Little and Associates: I believe it does not make sense to point out that a number of the buildings on Moore Street and surrounding areas suffered damage during 1916, and to argue that this should prevent their preservation.

The whole rationale for preserving Moore Street and the surrounding areas is precisely that they were a battleground site of huge historical importance.

Damage is inevitable in such a context; the fact that damage was incurred should, I believe, not be a reason for this area to be deemed unworthy of preservation.

Even if damaged buildings were repaired or restored in the years afterwards, that remains a direct repercussion of a vital event in the State's history, and is intrinsically connected to that event.

Thank you for your consideration of these points. I believe that this proposed development would be detrimental to this area and to Dublin in general.

I hope that you will take and my previous submissions into account when determining this case.

Kind regards,

Shane Stokes