



**Oifig Mary Lou McDonald TD**

Office of Mary Lou McDonald TD

**The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902**

<b>AN BORD PLEANÁLA</b>	
LDG-	088 314-22
ABP-	
14 JUL 2022	
Fee: €	270 type: <i>env</i>
Time:	By: <i>hand</i>

Thursday, 14 July 2022

ABP Case Reference: PL29N.313947

Dublin City Council Planning Ref: 2863/21

*Proposed development at 22-25 Moore Street, 13 Moore Lane, 14-15 Moore Lane, Dublin 1.*

To whom it may concern,

I wish to appeal the aforementioned planning permission granted by Dublin City Council on the 23 June 2022. I also request an oral hearing. The applicable fees have been discharged.

As required, I enclose Dublin City Council's acknowledgment of my initial observation regarding the this planning application submitted to Dublin City Council on the 1 June 2021.

*"A city's conserved historic core can also differentiate that city from competing locations – branding it nationally and internationally – thus helping the city attract investment and talented people. Cities that are the most successful at attracting investment and businesses to meet the aspirations of their citizens, while alleviating poverty and promoting inclusion, are those that harness all of their resources, including their heritage. In addition, heritage anchors people to their roots, builds self-esteem, and restores dignity. Identity matters to all vibrant cities and all people."*

Rachel Kyte, Vice President, Sustainable Development Network, The World Bank, taken from, 'The Economics of Uniqueness, Investing in Historic City Cores and Cultural Heritage Assists for Sustainable Development (2012)'.

Moore Street famed for its street market traditions and 1916 Rising connections is Dublin's historic core and as such provides the city's uniqueness in terms of a tourist offering and a sustainable, socially just, cultural and economically vibrant regeneration opportunity for the north inner city.



The current Dublin City Development Plan 2016 –2022 commits to create a city that will facilitate socially inclusive neighbourhoods in a coherent, sustainable manner for the benefit of the city.

In terms of zoning development objectives, the Plan commits to consolidate and facilitate development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.

As this and related planning permissions are so heavily reliant on demolition of north inner city's historic core and excessive office space it is not possible for this development to meet these zoning development objectives.

The three planning permissions granted by Dublin City Council for this historic site will not realise the unique potential of the north inner city or the commitments in the current Dublin City Development Plan. Rather they will deliver an unsustainable and failed homogenous city development model.

The grounds for my appeal are as follows –

- The concerns of the Planning Authority to the applicant's proposals have not been addressed by the further information submitted as the planning authority's specific requests for changes to the original design have not been complied with.
- The piecemeal planning application approach of the developer must be considered noting that there will be a total of six planning applications with the proposed public plaza is split across two planning applications. Citizens are in effect prohibited from exercising their statutory right to engage in the planning process as the potential personal cost of doing so is €1,620. This approach by the developer could be deemed vexatious.
- There were no references in the site notices or in the newspaper advertisements that the architectural model is on public display in the Council's offices at Wood Quay. The model was a specific requirement of the further information requested by the planning authority.
- There is still no recognition of the standing of The National Monument within the context of the terrace of houses that were held and occupied by volunteers in 1916 or of the historical importance of the area.
- There are no references to or reports on the buildings or structures that are currently in the process of being added to the list of protected structures as agreed unanimously by Dublin City Councillors (10 - 25 Moore Street).

- There is no reference to the requirement for Ministerial Consent for work in proximity to the 1916 National Monument or other Monuments of National Importance.
- The unnecessary demolition of the Moore Street streetscape, the location of the last Battle of the Easter Rising should not be permitted. The provision of a detailed methodology of the demolition works on the terrace, and the attached a condition that the developer engage its own archaeology and conservation consultant are unacceptable. It is inexplicable that the Department of Housing, Heritage & Local Government and Dublin City Council have both opted out of an oversight role in protecting and conserving the historic integrity of these buildings.
- No detailed traffic management plan was submitted, or protections secured for local and independently owned businesses or market traders who now have no mechanism by which to contribute or shape a detailed traffic plan. It is important to recognise that street traders and local and independently run businesses have already suffered years of disrupted trade arising from Luas works. This omission by Dublin City Council coupled with the inappropriate nature and scale of the development will also impact significantly on access to the Rotunda Hospital Dublin and the Mater Misericordiae University Hospital.
- The permissions will be the death knell for the Moore Street market first established in the 1850's. The traders and independent businesses have kept the heart of Moore beating but have been badly served by the Council and State's historic failure to invest in the area. The condition attached to the permission that the developer ensure the protection of the Moore Street Casual Trading Area as far as practicable and provide support and liaise with the Traders where ongoing trading is no longer possible or construction works necessitate relocation of the casual trading area is non sensical. It offers no protections to traders over the proposed excessive development period, or indeed recourse when they are inevitably left unable to trade.
- The proposed demolition of buildings remains unnecessary and should not be permitted. The eradication of the historic grain of the areas laneways and streets is contrary to the Principles of Reurbanism. Matters regarding Ministerial Consent have also not been resolved in terms of the Moore Street terrace and the National Monument. It would be intolerable for Dublin City Council and An Bord Pleanála to grant permissions that may interfere with such consents.
- Build to rent units form 89 per cent of the proposed residential units comprising of one bed studios or one bed apartments. The amenity space provided is minimal. Both run contrary to the Dublin City Development Plan 2016 –2022 commitment to create a city that will facilitate socially inclusive neighbourhoods in a coherent, sustainable manner for the benefit of the city. There is no provision in the permissions for affordable homes.
- Dublin City Council members voted unanimously to amend the city development plan to make Moore Street an Architectural Conservation Area.

- The applications and permission fails to recognise the Moore Street area as a group of structures that is of special architectural, historical, archaeological, technical, social, cultural, or scientific, interest.
- The planning application and permission fails to recognise the Shaffrey/Myles Battlefield Report which clearly identifies surviving pre-1916 built fabric visible from the public realm.

The planning permission continues to ignore the –

- policy of Dublin City Council in relation to the preservation of Moore Street in its entirety, the recommendations of the City Council Moore Street Advisory Committee & The Lord Mayors Forum and successive motions adopted by Dublin City Councillors elected members including that Moore Street become an Architectural Conservation Area and that the Moore Street terrace be added to the list of protected structures;
- the objectives of the Dublin Development Plan and International Guidelines and Charters on the protection of Heritage and History and fails to address or accept the findings of the High Court and Court of Appeal that buildings or structures, the preservation of which are of national importance, are deemed National Monuments worthy of the highest form of protection available to the State;
- Deputy Aengus Ó Snodaigh's An Bille Um Cheathrú Chultúir 1916 currently under consideration by the Oireachtas, and The Moore Street Renewal and Development Bill placed before the Seanad by Minister Darragh O' Brien in 2015.

The unnecessary demolition of buildings on Moore Street remains. The Department of Housing, Local Government and Heritage in its observation to Dublin City Council noted that many of the existing buildings are capable of refurbishment and adaptation and recommended and that the planning authority consider whether an alternative design of the redevelopment of this site would allow for the retention and sensitive adaptation for reuse of significant existing structures.

Finally, this proposed development is overbearing, significantly out of scale and character with the prevailing architectural context and would represent substantial overdevelopment of the Moore Street site which has been deemed by the National Museum as the most important historic site in modern Irish history.

I urge An Bord Pleanála to respond appropriately to this and related planning permissions failure to protect and preserve this area of unique historical, architectural, social, cultural and economic importance, and to consider the Moore Street Preservation Trust's architects and planners alternative masterplan for Moore Street commissioned from a team of leading Irish

architectural firms, planners and consultants overseen by Architects Seán Antóin Ó Muirí of Fuinneamh Workshop and James Kelly of Kelly & Cogan, Architects.

I ask that An Bord Pleanála reverse this planning permission.

Is mise, le meas,

A handwritten signature in black ink, appearing to read 'Mary Lou McDonald'.

**Mary Lou McDonald**

*Teachta Dála for Dublin Central & Uachtarán Shinn Féin*

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

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

T: (01) 222 2288  
E. [planningsubmissions@dublincity.ie](mailto:planningsubmissions@dublincity.ie)

Ms Mary Lou McDonald  
58 Fassaugh Ave, Cabra West  
Dublin 7  
Dublin

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

<b>PLAN NO.</b>	2863/21
<b>DATE RECEIVED:</b>	01-Jun-2021
<b>LOCATION :</b>	22-25 Moore Street, 13 Moore Lane, 14-15 Moore Lane, Dublin 1
<b>PROPOSAL :</b>	<p><b>PROTECTED STRUCTURE:</b> Dublin Central GP Limited intends to apply for Permission for a period of 15 years at a site, 'Dublin Central - Site 5' (c. 0.18 Ha) at No. 22 - 25 Moore 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 O'Rahilly Parade to the north, by Moore Lane to the east, by No. 21 Moore Street and No. 12 Moore Lane to the south and by Moore Street to the west. The proposed development comprises: - A mixed-use scheme in a single building (c. 6,478 sq. m gross floor area) ranging in height from 2 - 6 storeys (top floor set back) over single storey localised basement. The building includes office space (c. 5,753 sq. m) from 1st to 5th floor with office lobby at ground floor level, with 3no. terraces at 2nd, 3rd and 5th floor respectively (c. 401 sq. m in total) and 3no. licenced restaurant / café units with takeaway / collection facility at ground floor (Unit 1 on Moore Lane, O'Rahilly Parade and the proposed new public plaza - c. 228 sq. m, Unit 2 on the proposed new public plaza - c. 271 sq. m and Unit 3 on Moore Street, O'Rahilly Parade and the proposed new public plaza - c. 179 sq. m), together with provision of a 'delivery hub' unit at ground floor level (c. 46 sq. m). All associated and ancillary site development, demolition, landscaping, site infrastructure and temporary works, including: - Demolition of all existing buildings and structures on site (c. 2,312 sq. m); Provision of part of a new public plaza (168 sq. m) and associated temporary works pending completion of the combined plaza with the concurrent planning application for the adjoining Site 4 immediately to the south (1,253 sq. m public plaza overall); 58no. bicycle parking spaces at ground floor level with associated cycling welfare facilities; Plant at basement and roof level; Building signage zone and retractable canopies; Laying of underground drainage infrastructure from O'Rahilly Parade to connect with existing drainage network on Parnell Street via Moore Street. The</p>

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application site is outside the O'Connell Street Architectural  
Conservation Area. An Environmental Impact Assessment Report  
(EIAR) accompanies this application.

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

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

To Whom It May Concern,

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

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

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

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

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

Yours faithfully,

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**For ADMINISTRATIVE OFFICER**

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

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07-Jul-2021