

AN BORD PLEANÁLA

LDG- _____

ABP- _____

14 JUL 2022

Fee: € 220 Type: Buro

Time: 1440 By: Ward

Appeal - re. 2863/21 Dublin Central to An Bord Pleanala

Tue, 12 Jul 2022 at 12:18 p.m.

Re Plan No 2863/21

The 1916 Relatives Moore Street Initiative, 13th July 2022.

Opening Statement -

The 1916 Relatives Moore Street Initiative wish to Appeal above Plan, phase 3 of the Hammerson plan for Moore Lane and O'Rahilly Parade and adjacent buildings!

The 1916 Moore Street Initiative comprises Grandchildren of those brave Volunteers killed in action on the cobbles of the Moore Street Battlefield Site Easter week 1916 including a grandson of The O'Rahilly being the only leader to be killed in action that week.

This Historical area was described by our own National Museum as the most important historic site in Ireland back in 2012 to the then Minister for Heritage, Jimmy Deenihan!

For us, this is sacred, consecrated ground!

To interfere or part destroy it in the commercial interest of a private developer would be an unthinkable destructive act of immense proportions removing forever our history and the place where our Republic was born.

Place in History

When the first Evacuation from the burning GPO took place on Easter Friday evening, 1916, a party led by The O'Rahilly left the Post Office and charged down Moore Street in the hope of reaching the Williams and Woods jam factory on Parnell Street and use the building as their new fortification. However unknown to the men the British had installed a Maxim Machine gun at the bottom of the street and they were mown down however The O Rahilly was able to drag himself into Sackville Lane, now O'Rahilly Parade where he managed to write his last note home to his wife and sons this was approx 6.30pm on the Friday night, he lay there in agony as he bled to death alone with his dead Comrades nearby at Dead Man's Corner beside No's 24/25 Moore Street, he was still alive, just, the following Sunday morning!

Needless to say O'Rahilly Parade is a very sacred place and must be left intact!

The O'Rahilly's commissioned a Sculptor and a bronze Plaque was erected on the wall opposite where he gave his life for Ireland in the Laneway and was unveiled by his Blannaid O Rahilly back in 2005!

Thousands of visitors walk down Moore Street each year, some after visiting the GPO Historical Museum learning the history of 1916 and the Battle which occurred only a stones throw away, to be able to walk these historic cobbles is a unique experience and Dublin has this treasure, an Urban Battlefield, no other City in the world has this, it must be

preserved and protected as it belongs Solely to the proud people of Ireland and her future Generations, it does not belong to any one Government, or Developer!

The Historic significance of the entire Terrace is incalculable as the entire 350 GPO Garrison along with five of the Leaders, Signatories to the Irish Proclamation, held out there after the second Evacuation making their entry to No 10 Moore Street from the side door on Henry Place, they came under fierce fire at the junction of Moore Lane and Henry Place. This is a unique, sacred Urban Battlefield Site and must be sensitively protected and preserved as such to otherwise will go down in the History books forever and for all the wrong reasons, we don't want a disgraceful, scandalous repeat of The O' Rahillys historic home at 40 Herbert Park, Ballsbridge?

Survey Reports

We and all the 1916 Relatives have been seeking a survey report on all the buildings, structures on Moore Street for the past two decades!

Finally the City Planners saw fit to grant consent to the Hammerson planning applications before these important surveys and findings of same were available for consideration. This simply beggars belief? That consent, therefore, cannot be deemed valid.

There also is No mention in the grant of permission, nor in the previous two, that the consent of the Heritage Minister is required for any works in proximity to the 1916 National Monument under the legislation.

Minister Daragh O'Brien has maintained an inexplicable silence in all of this, despite the fact that he is directly responsible as Guardian in our name for the State owned National Monument at 14/17 and importantly all other structures within the area.

He personally stated on Moore Street standing by No 16 back in 2015, and I quote, "Moore Street is the birthplace of the Republic and it must be Treasured as one of our most important National Monuments"!

Indeed as clarified by our own National Museum.

In 2016 the then Deputy Darragh O'Brien stated, " The Fine Gael - Labour coalition's plans for Moore Street would have seen the destruction of a very important part of Irish History! In the year we celebrate the Centenary of the 1916 Rising we should be thanking the 1916 Relatives whom took this landmark Court Case to make sure we protect the Street and all the surrounding areas, preserving and restoring it for future generations to enjoy and to preserve the memory of the gallant men and women who fought in 1916 ".

Can one name a City or Country that has such a historical site and that the planning authorities then decided that they had the right to mutilate and destroy such a National asset?

Interference in the planning process

At behind closed doors meetings, Department personnel, City Council officials and representatives of Hammerson placed undue and unfair pressure on the Moore Street traders to accept monetary compensation to be paid out of the public purse for disturbance and loss of earnings *on condition* of their support for ALL three planning applications for the development of Dublin Central including opposition to the Alternative Plan, by Relatives of the Leaders, submitted to the Advisory Group to the Minister along with the O'Snodaigh Bill at Committee stage in Dail Eireann.

These discussions took place before the lodging by the applicants of all three planning applications?

Further Grounds of Appeal - Summary

We wish also to state the following relevant issues under grounds of appeal

Gross Interference with the Planning process:

Compensation payment to traders was conditional on support of the Hammerson applications -

records of meetings are not available?

No reference to Ministerial consent in the application for development in the vicinity of the declared Monument at 14 to 17 Moore Street.

Lead Hammerson architect was not registered to practice in Ireland at the time of application contrary to regulations.?

ACME architects for Hammerson's applications were not registered at time of submission of drawings?

Bord members presently under investigation are in no position to consider the Appeal. They must recuse themselves!

An oral hearing is required as a development is in an area a matter of national importance.

The Bord that granted the disgraceful consent to The O'Rahilly's historic home cannot now allow the destruction of the location of his death!

The Laneway O'Rahilly Parade is a National Monument since its Preservation is a matter of national importance, it was the location of the deaths of Charles Carrigan, Francis Macken along with The O'Rahilly! Therefore this is sacred ground!

The application runs contrary to the principles of the Venice Charter on National Monuments setting and context.

An Bord Pleanála cannot but allow this appeal since consent was granted by a planning authority that is in blatant breach of Planning laws of their own making in relation to property under the ownership and control within the site at 24/25 Moore Street.

The Authorities use of the premises on O'Rahilly Parade as a Refuse Depot is in flagrant breach of Planning laws as is the use of the facades of 24/25 Moore Street as an advertising hoarding.

Were ABP to refuse this appeal they would be seen to be turning a blind eye to a clear breach of the law that the planning authority itself is duty bound to uphold.

This is the Bord that granted consent for the demolition of the Historic O'Rahilly home totally ignoring calls by various groups and myself personally, I lodged an in depth submission of the history of the house, along with the Minister for Culture for its protection on social, historic and architectural grounds.

Its unlawful dawn demolition remains a very dark and shameful day in Planning in Ireland. Ignoring the wish of city councillors to list this historic house the voice of the people was ignored and silenced.

Now is surely the time for a full investigation as how the members of the Bord reached their disgraceful decision.

A similar decision must not be made re O'Rahilly Parade where he gave his life for Ireland. The Taoiseach stated in the Dail Chamber the day of the demolition back in September 2020, that it was an unauthorised demolition and in the future all Iconic Heritage Buildings and Sites would be protected and preserved!

Is the 1916 Moore Street Battlefield Site and O'Rahilly Parade not Iconic!

Finally -

The 1916 Relatives Moore Street Initiative are of the view that no decision be taken by An Bord Pleanála on this Appeal until such time as the enquiry on activities within ABP requested by the Minister reach its conclusion.

It is also of great concern that ABP member Ms Michelle Fagan has yet to respond to allegations of conflict of interest in a number of appeals before ABP and that she was party to the decision to refuse requests for an Oral hearing in relation to appeals submitted in relation to two other applications for Dublin Central submitted by the applicants.

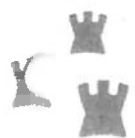
This is our Appeal against the decision to grant permission.

The 1916 Relatives Moore Street Initiative.

Proinsias O Rathaille. Grandson of The O' Rahilly.

Harry Coyle
Grandson of Henry Coyle.

Brendan Mulvihill
Grandson of Michael Mulvihill.



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

An Roinn Pleanála & Forbairt Maoine, Bloc 4, Uriár 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

Proinsias O'Rathaille on behalf of 1916
Relatives Moore Street Initiative
Altis, Ballinclea Road, Killiney, County
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

PLAN NO.	2863/21
DATE RECEIVED:	29-Apr-2022
LOCATION :	22-25 Moore Street, 13 Moore Lane, 14-15 Moore Lane, Dublin 1
PROPOSAL :	<p>PROTECTED STRUCTURE: 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</p>



An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3,
Oifigi 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 2149

E. appeals@dublincity.ie

30-Jun-2022

Dear Sir/Madam,

The Planning Authority hereby informs you that an appeal has been lodged with An Bord Pleanála in respect of the above proposed development.

You may make a written submission to An Bord Pleanála regarding this appeal provided that –

- a) Your submission is received by An Bord Pleanála **within 4 weeks from the start date of the appeal.**
You should contact An Bord Pleanála for details of the start date (Please see contact details below).
- b) Your submission is accompanied by a fee of €50.00.

All further correspondence in relation to this appeal should be addressed to:

The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1, T. (01) 858 8100 E. bord@pleanala.ie

Yours faithfully,

Shaun O'Brien / Oliver O'Leary
For Administrative Officer