

Our Ref : 17-043.005  
Your Ref :  
E-mail : b.mccann@waterman-moylan.ie  
Date : 7<sup>th</sup> December 2017

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

**Re : New Civic Plaza at College Green and Ancillary Traffic Management Measures**

Dear Sirs,

We refer to the recent public notice advising that further information has been furnished by Dublin City Council to An Bord Pleanála in connection with the New Civic Plaza at College Green and Ancillary Traffic Management Measures in accordance with Section 175(5)(d) of the Planning and Development Act 2000, as amended.

On behalf of Lowstrand Properties Ltd, owners and operators of the Fleet Street Car Park, Fleet Street, Dublin 2, we enclose duplicate copies of the submission from Lowstrand Properties relating to the implications of the proposed development for the operation of the car park.

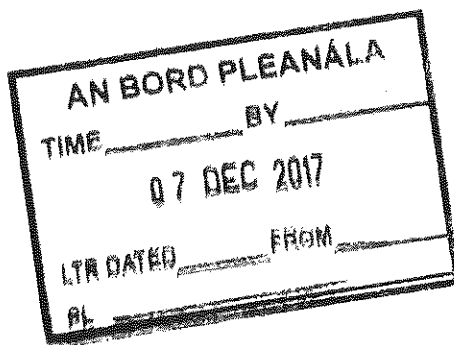
This submission should be read in conjunction with our previous submission dated June 2017.

Should you have any queries, please contact the writer.

Yours faithfully,



Brian McCann  
Consultant  
Waterman Moylan



Encl. (2)

c.c. Lowstrand Properties  
  
Park Rite

Att. Barbara Kenny  
  
Pat Magennis

AN BORD PLEANÁLA  
TIME \_\_\_\_\_ BY \_\_\_\_\_  
LTR DATED 07 DEC 2017  
PL \_\_\_\_\_ FROM \_\_\_\_\_



## **Fleet Street Car Park, Fleet Street, Dublin 2**

Submission to An Bord Pleanála in relation to the Environmental Impact Assessment Report for the New Civic Plaza at College Green and Ancillary Traffic Management Measures

December 2017

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**Waterman Moylan**  
Engineering Consultants

**Client Name:** Lowstrand Properties  
**Document Reference:** 17-043r.003  
**Project Number:** 17-043

### Quality Assurance – Approval Status

This document has been prepared and checked in accordance with  
Waterman Group's IMS (BS EN ISO 9001, 2008, BS EN ISO 14001: 2004 and BS OHSAS 18001:2007)

<b>Issue</b>	<b>Date</b>	<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>
1	7 Dec 2017	Brian McCann	Joe Gibbons	Joe Gibbons

### Comments



**Waterman Moylan**  
Engineering Consultants

#### Disclaimer

This report has been prepared by Waterman Moylan, with all reasonable skill, care and diligence within the terms of the Contract with the Client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the Client.

We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.

This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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# 1. Background

## 1.1 Introduction

This submission to An Bord Pleanála in relation to the Environmental Impact Assessment Report (EIAR) for the New Civic Plaza at College Green and Ancillary Traffic Management Measures has been prepared by Waterman Moylan on behalf of Lowstrand Properties for the Fleet Multi-Storey Car Park, Fleet Street, Temple Bar, Dublin 2.

This submission should be read in conjunction with *Fleet Street Car Park, Submission to An Bord Pleanála in relation to the College Green Project Proposed by Dublin City Council* prepared by Waterman Moylan in June 2017

## 1.2 Issues and Concerns

This submission addresses the concerns of Lowstrand Properties in relation to the ongoing and further reduction in access opportunities for customers using the Fleet Street Car Park.

The imposition of further restrictions on access to the car park continues to have a significant negative impact on the day to day operation of the car park.

## 1.3 Location

The location and catchment area of the Fleet Multi-Storey Car Park in relation to the transportation network in the city centre and the College Green Project is illustrated on Figure 101.

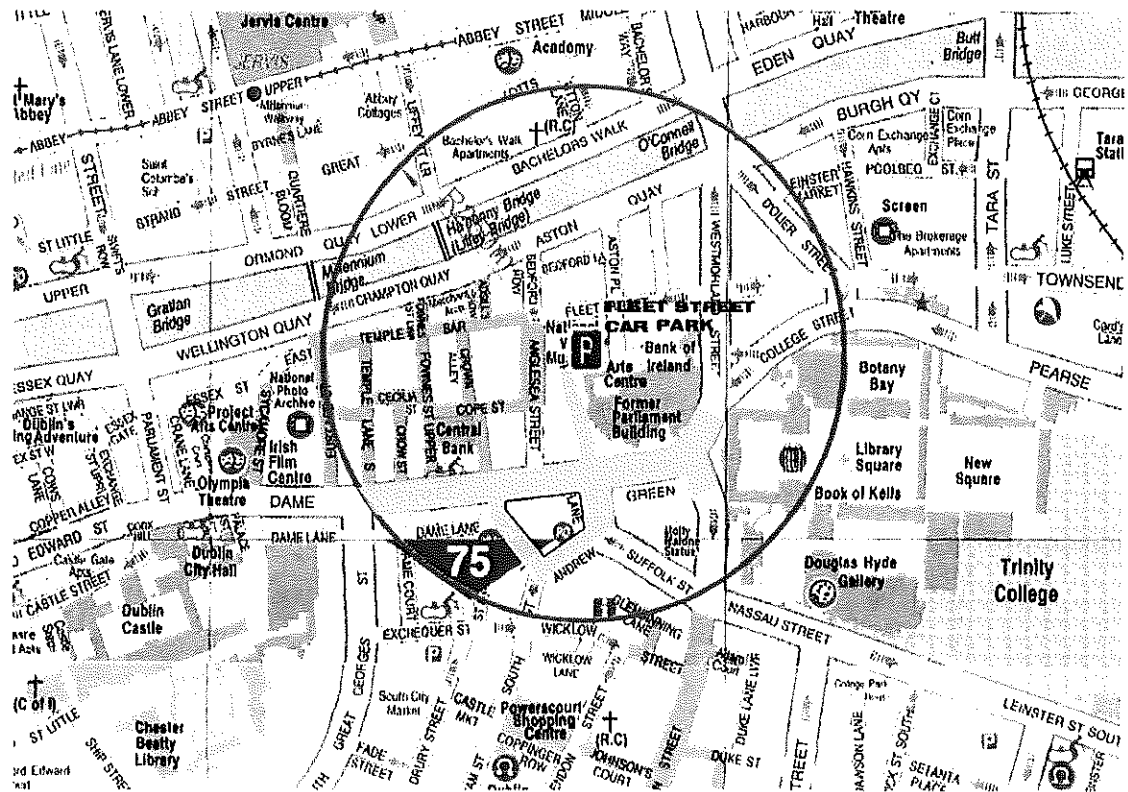


Figure 1 Location Map for Catchment Area and College Green Project

## 2. Environmental Impact Assessment Report (EIAR)

### 2.1 Description of Project

The College Green Project is described in the Environmental Impact Assessment Report (EIAR) submitted by Dublin City Council to An Bord Pleanála in November 2017.

### 2.2 Contents of The EIAR

Section 6.3.1: *Traffic and Transportation* notes that a number of streets will be directly or indirectly impacted by the College Green project. These include a number of streets which together make up the existing and former access routes to the Fleet Street Car Park.

- Anglesea Street
- Aston Place
- Aston Quay
- Bedford Row
- Fleet Street

Access to car parking is referred to in Section 6.6.2.5 of the EIAR – See Figure 6.11.

Section 15.7 of the EIAR advises that 'A car park is located in Parliament Row which is accessed via Fleet Street.

The location of the car park is designated in Figure 15.1 the EIAR as '*Transportation and Storage*

No other references to the Fleet Street Car Park were noted in the EIAR. Nor were any mitigation measures proposed.

Otherwise, the EIAR is silent on its stated purpose ...'*to report on the potential effects of a proposed development* ....

### 2.3 Omissions from the EIAR

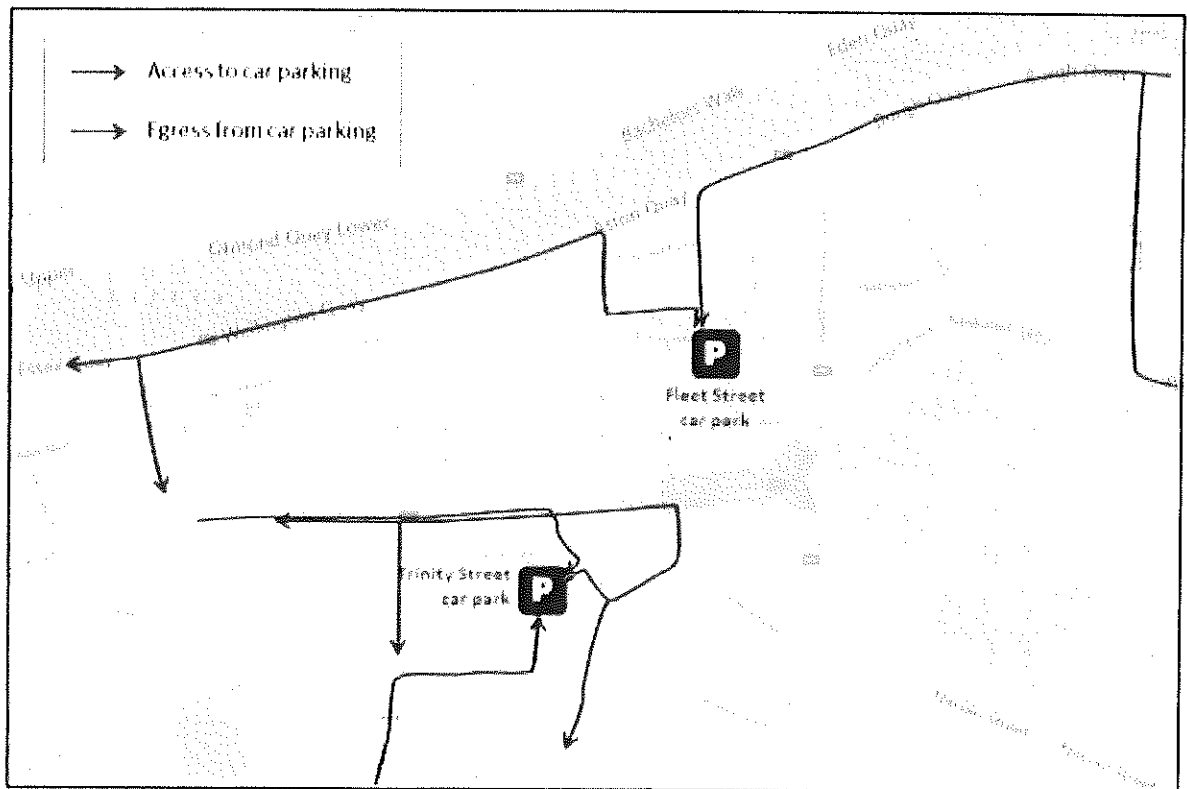
The Environmental Impact Assessment Report for the College Green contains a significant number of important omissions which are necessary if the proposals are to be reviewed, considered and assessed by An Bord Pleanála in the designated manner.

The omissions the EIAR include

- (a) A description of the future access to the Fleet Street Car Park based on the outcome of discussions between Lowstrand Properties and Dublin City Council in 2016 (See Section 5.3 of this submission).
- (b) A prediction of the additional traffic on Anglesea Street using the proposed alternative route to access the Fleet Street Car Park
- (c) An assessment of the economic impact of the College Green Project on the Fleet Street Car Park (omitted from Section 15 of the EIAR).

- (d) The impact on and proposals for local traffic displaced from College Green (omitted from Section 6 of the EIAR).
- (e) Proposals and a timescale for the promised Car Park Signage Scheme (omitted from Section 6 and 19 of the EIAR).
- (f) Proposals and a timescale for the promised City wide Directional signage scheme (omitted from Sections 6 and 19 of the EIAR).

The cumulative effect of these omissions is that the EIAR does not review, assess or consider all of the potential effects of the proposed development.



**Figure 6.11: Proposed Car-Park Access**

(Reproduced from Section 6.6.2.5 of EIAR)



### 3. Fleet Street Multi-Storey Car Park

#### 3.1 Background

The 'Submission to An Bord Pleanála in relation to the College Green Project Proposed by Dublin City Council' prepared by Waterman Moylan and dated June 2017 addressed the following issues in relation to the Fleet Street Car Park

- Origin (Temple Bar Properties)
- Description (393 spaces)
- Area Served (Temple Bar)
- Facilities Served (28 No)
- Customer Origin
- Purpose of Customer Visit
- Occupancy (220,000 parking events per year).
- Economic Benefit to Temple Bar (€30m)
- College Green Bus Gate (July 2009 – Date)
- Arrival Routes – Pre 2015 (4 No)
- Departure Routes – Pre 2015 (1 No)
- Arrival Routes – Post 2015 (3 No)
- Departure Routes – Post 2015 (1 No)
- Arrival Routes – 2017 (1 No)
- Departure Routes – 2017 (1 No)

#### 3.2 Parking Events

A consequence of the LUAS construction works and the recent traffic management changes in the City Centre has been a significant reduction in the number of parking events at the Fleet Street Car Park.

Parking events dropped from 53,294 per quarter in 2015 to 45,288 per quarter in 2016 (- 15%). A further drop to 38,605 per quarter occurred in 2017 (- 28%).

These reductions in usage are likely to have significant impacts on the financial viability of the car park to fulfil its founding function of serving the Temple Bar area into the future.

## 4. City Centre Traffic Management

### 4.1 Transportation Objectives

A number of transportation objectives taken from public consultation documents were referred to in our submission of June 2017. These objectives are reproduced below

- *To improve accessibility and permeability to and within, the City Centre for pedestrians, cyclists and public transport users, while maintaining an appropriate level of access for vehicular traffic for commercial and retail purposes.*
- *The private car will continue to be an important choice for people travelling to the City Centre, particularly for shopping and commercial activities.*
- *'The retention of an appropriate level of private car vehicular access to the City Centre for retail and commercial purposes'.*
- *Rationalisation of car park access/egress and car park location, while retaining appropriate and adequate car parking where possible for retail and commercial functions.*
- *Multi-storey car parks within the city centre were mapped with key access and egress routes highlighted; this will be complemented on the ground through the enhancement of the existing electronic and static car park signage scheme.*
- *Ensure access to car parks and delivery routes can be maintained*

Most of these objectives do not appear to have been prime considerations in preparation or conclusions of the EIAR.

The documentation issued by Dublin City Council for public consultation in relation to the proposed traffic management changes in the City Centre are significantly deficient on the accompanying traffic management measures which the City Council and the general public consider necessary to mitigate the impact of the proposals on the operation of the transportation network in the City Centre.

Without these accompanying measures, the proposed changes are likely to impact severely on all users of the city centre except for passengers on Luas LCC for whom the changes continue to be pushed through with little regard for the rights of other road users.

## **5. Impact on Fleet Street Car Park**

### **5.1 Overview**

The recent implementation of traffic management measures to facilitate LUAS Cross City at the expense of other road users particularly buses has effectively reduced access to the Fleet Street Car park to a single connection from Aston Quay.

The access which is illustrated in Figure 6.11 of the EIAR comprises

- Inbound via Burgh Quay, Aston Quay and Aston Place
- Outbound via Fleet Street and Bedford Row to Aston Quay.

### **5.2 Customer Routes Affected**

The restrictions have seriously affected the 60% customers who formerly accessed the car park from Ormond Quay (30%) and Dame Street (30%).

In addition, the remaining access route could be severed in the future by proposals mooted by Dublin City Council for the banning of cars from Aston Quay

Likewise, the single exit route via Fleet Street and Bedford Row could also be severed by the proposed pedestrian priority on Fleet Street and Temple Bar (between Westmoreland Street and Eustace Street) and by the banning of cars from Aston Quay.

### **5.3 Discussions with Dublin City Council**

Recent discussions between the owners of the Fleet Street Car Park and Dublin City Council (DCC) / National Transport Authority (NTA) on alternative routes into and out of the Fleet Street Car Park focussed on an arrival route from Dame Street via Anglesea Street and a departure route to Crampton Quay via Bedford Row. See Figure 106.

Confirmation that these on-street traffic management changes are acceptable to Dublin City Council and that they would be implemented by the Council was expected in early 2017 but has not been received to date.

### **5.4 Fleet Street**

Following the recent traffic management changes, the former access route via Fleet Street has become severely limited. This route and the only exit route via Fleet Street and Bedford Row could be severed in the near future by the proposed pedestrian priority on Fleet Street and Temple Bar (between Westmoreland Street and Eustace Street) or by the banning of cars from Aston Quay.

### **5.5 Summary of Impacts**

In summary, both the one remaining inbound access route and the only outbound egress route could both be severed by future traffic management proposals with no alternative routes to replace them.

As a result, customers would no longer be able to access the Fleet Street Car Park with a consequent economic loss of up to €30m per annum to the Temple Bar economy. Such a loss would lead to diversion of trade with consequent loss of jobs in local businesses and loss of rates to the City Council.

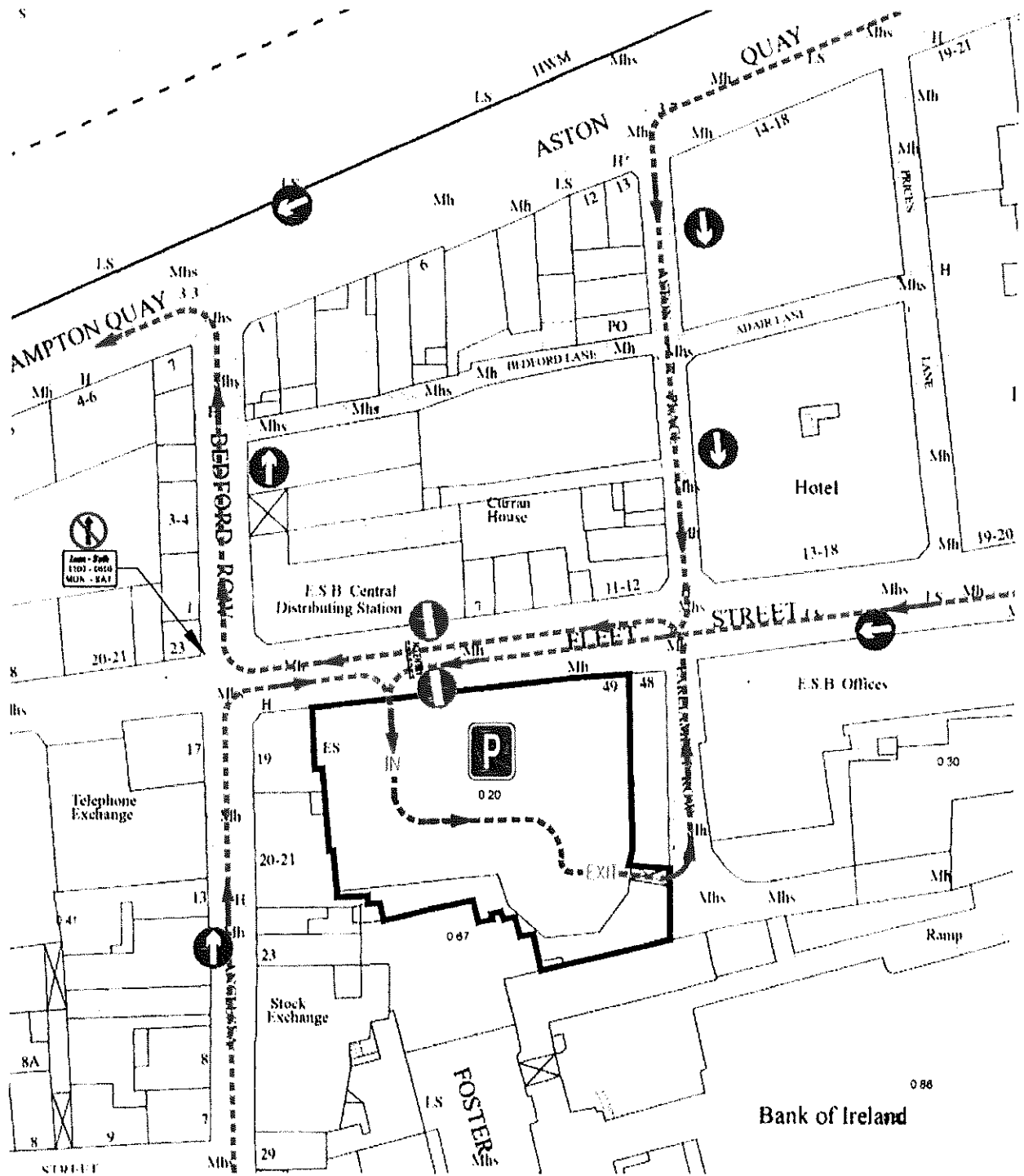


Figure 2 Future Arrival and Departure Routes

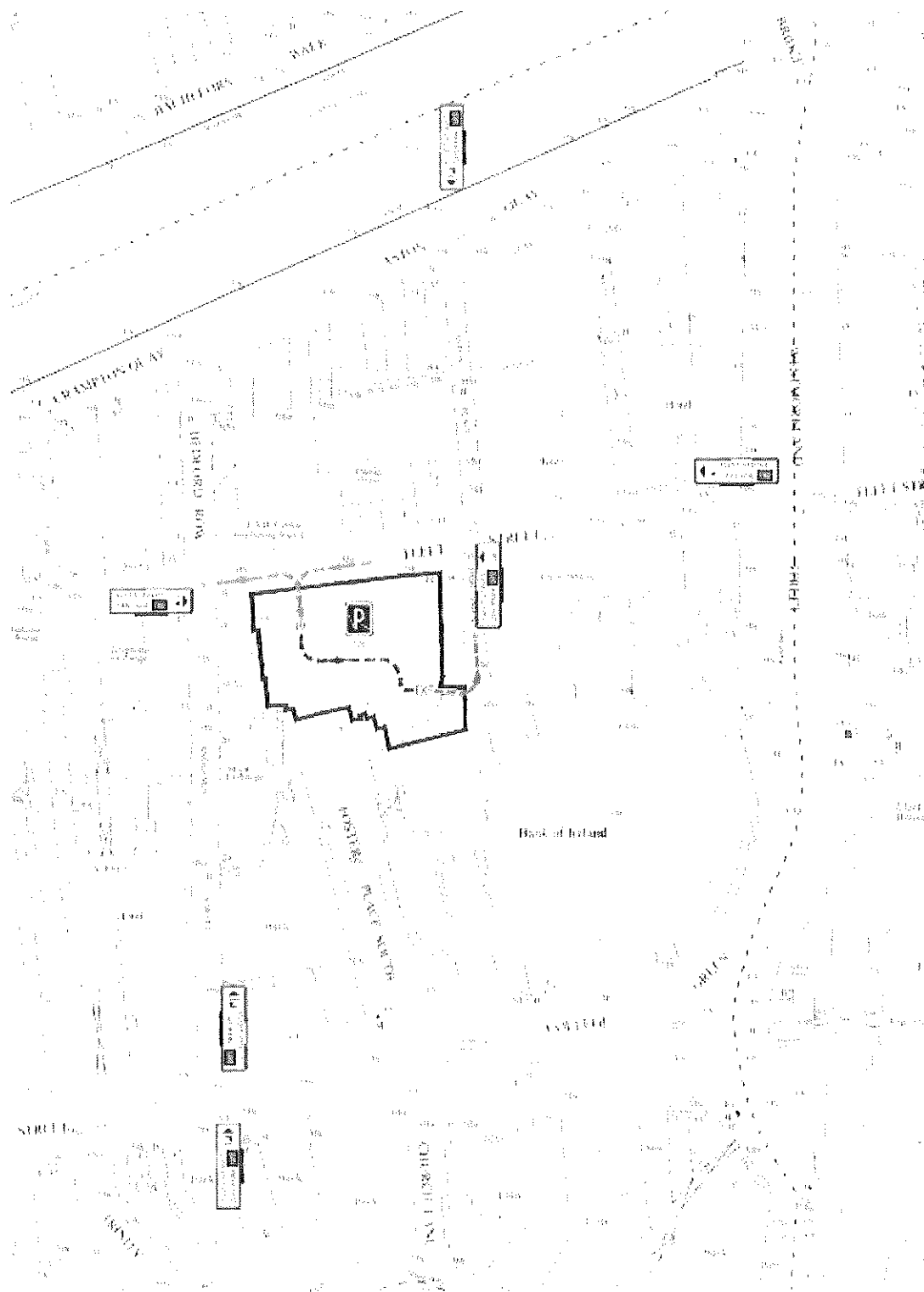


Figure 3 Signage for Proposed Access

## **6. Submissions**

### **6.1 Submission 1 Adequacy of EIAR**

The EIAR does not report on all of the relevant potential impacts of the College Green Project on the Fleet Street Car Park.

The purpose of this submission is to draw the attention of An Bord Pleanála to the inadequacies of the EIAR in relation to the Fleet Street Car Park.

### **6.2 Submission 2 Impact on Fleet Street Car Park**

The EIS does not review, assess or consider the operational or economic impacts on the Fleet Street Car Park of the of traffic management measures identified in the EIAR for the College Green Project.

The purpose of this submission is to draw the attention of An Bord Pleanála to the omission from the EIAR of the impacts on the Fleet Street Car Park.

### **6.3 Submission 3 Car Park Signage Scheme**

The proposed mapping and signage systems for access to car parks in the City Centre including the Fleet Street Car Park should be implemented in conjunction in advance of the College Green Project.

The purpose of this submission is to mitigate the impact of current and future traffic management proposals on the car parks in the City Centre.

### **6.4 Submission 4 Parliament Street**

The proposal to restrict Parliament Street to public transport only between 7am and 7pm for should be amended to permit access to Dame Street.

The purpose of this submission is to retain access to the Fleet Street Car Park from the west following the introduction of restrictions on the right turn from Bachelor's Walk onto O'Connell Bridge.

### **6.5 Submission 6 Customer Access to Fleet Street Car Park**

In the event that the decision is to approve the proposed development, An Bord Pleanála is requested to include a condition in any approval requiring Dublin City Council to maintain appropriate and adequate access for cars to the Fleet Street Car Park from the city street network. Such access to be maintained for a minimum period of 30 years.

Such access shall include but not limited to

- (a) From the north via Gardiner Street, Memorial Road, George's Quay, Burgh Quay, Aston Quay and Bedford Row.
- (b) From the northeast via Amiens Street, Memorial Road, Burgh Quay, Aston Quay and Bedford Row.
- (c) From the southeast via Pearse Street, Tara Street, Burgh Quay, Aston Quay and Bedford Row.
- (d) From the south via Georges Street, Exchequer Street, St Andrews Lane, Trinity Street, St Andrews Street, Church Lane, Dame Street, Anglesea Street and Fleet Street.

- (e) From the southwest via Lord Edward Street, Dame Street, Anglesea Street and Fleet Street.
- (f) From the west via Ormond Quay, Parliament Street, Dame Street, Anglesea Street and Fleet Street.

It will be noted that three of these routes are from Dame Street via Anglesea Street and three from Aston Quay via Bedford Row.

The purpose of this submission is to facilitate the ongoing operation of Temple Bar by ensuring that the connectivity of the Fleet Street Car Park to the surrounding street network is maintained and not diminished, disrupted or further restricted by any of the current measures already implemented being proposed by the City Council.

## **6.6 Submission 7 Economic Impact**

In the event that Dublin City Council fail to maintain appropriate and adequate access for cars to the Fleet Street Car Park from the city street network, An Bord Pleanála is requested to include a further condition requiring Dublin City Council to either

- (a) Compensate Lowstrand Properties for any loss in parking revenue at the Fleet Street Car Park attributable to the loss of access from the city street network brought about by Dublin City Council.
- (b) Alternatively, impose a condition requiring Dublin City Council to acquire the interests of Lowstrand Properties in the Fleet Street Car Park at market value based on the access which the car park enjoyed prior to 2015.

The purpose of this submission is to protect the economic wellbeing of the Fleet Street Car Park from being destroyed by the current proposals for traffic management measures on the surrounding street network.

## 7. Summary

Some two decades ago, the development of the Fleet Street Car Park was actively promoted by the Government of Ireland through the agencies of Dublin City Council and Temple Bar Properties.

The stated purpose of providing the car park was to serve the needs of the Temple Bar area.

In recent years, the many traffic management changes introduced by Dublin City Council in the City Centre particularly for LUAS LCC in the last few years have severely undermined the operation of the Fleet Street Car Park by curtailing access from the surrounding street network.

The current proposal for the College Green Project as described in the EIAR when taken together with a further series of traffic management restrictions also being proposed, will reduce this access further.

The Dublin City Council as set out in City Development Plan and the City Centre Traffic Study recognises that *'The private car will continue to be an important choice for people travelling to the City Centre, particularly for shopping and commercial activities'* and that *'The retention of an appropriate level of private car vehicular access to the City Centre is essential for retail and commercial purposes'*.

These objectives will not be achieved unless An Bord Pleanála impose appropriate conditions in any approval it may grant for the College Green Project.



APPENDIX A

# UK and Ireland Office Locations

