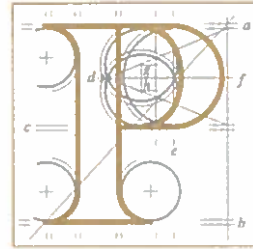


**Our Ref:** 29S.JA0039  
**P.A.Reg.Ref:**

**Your Ref:**



An  
Bord  
Pleanála

Anthony T Hanahoe  
M.E. Hanahoe  
Sunlight Chambers  
21 Parliament Street  
Dublin 2

27th February 2018

**Re:**

Development of a new civic plaza and ancillary traffic management  
measures at College Green,  
Dublin 2.

Dear Sir,


An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

Please forward an electronic copy of the documentation listed in the appendix to your submission.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

*PP*   
Kieran Somers  
Executive Officer  
Direct Line: 01-8737107

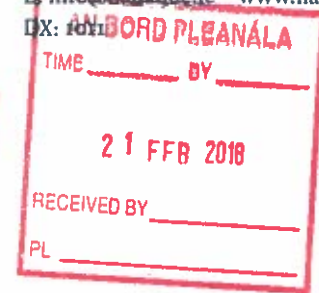
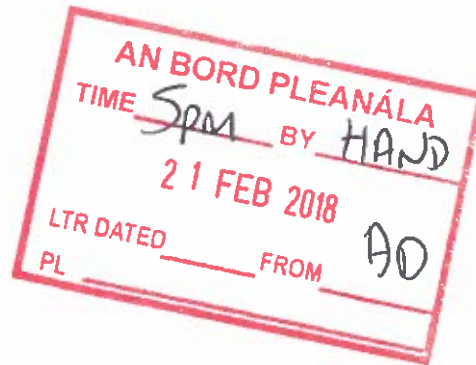
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**M.E. HANAHOE**  
SOLICITORS

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T. +353 (1) 677 2353 F. +353 (1) 671 2660  
E. info@hanahoe.ie www.hanahoe.ie

**BY HAND**  
The Secretary  
An Bord Pleanála  
Marlborough Street  
Dublin 1



21<sup>st</sup> February 2018

**Re: Proposed Development of a New Civic Plaza at College Green Dublin and Ancillary Traffic Management Measures.  
An Bord Pleanála Reference PL29S.JA0039**

Dear Sirs,

We refer to notice dated Friday the 19<sup>th</sup> day of January 2018 which provides for submissions to be made in respect of an Environmental Impact Assessment to be carried out by An Bord Pleanála in respect of the above proposal.

Having had the opportunity to review the Response for Information Request from An Bord Pleanála on behalf of Dublin City Council and having considered same alongside the original College Green Project Environmental Statement dated May 2017 and subsequent Environmental Impact Assessment Report we have concluded that the application currently subject to consideration is terminally flawed as it is lacking in sufficient detail and fails to address critical considerations ordinarily expected of an application of this type and more seriously is inconsistent with established principles of good planning and existing principles and protocols of Dublin City Council referenced therein.

Furthermore, it is clear that this exercise fails to comply with the requirements of the Environmental Impact Directive and thus is in breach of domestic and European Law.

The inconsistencies and contradictions are too numerous to detail in one written submission and therefore it is our intention to address same the oral hearing with the assistance of the documentation listed underneath.

Additionally we will be calling upon a number of expert witnesses to support our position and criticism of Dublin City Council's submissions.

We would also respectfully request that the Board arrange for the attendance of representatives from Clifton Scannell Emerson Associates, ARUP, Roughan & O'Donovan and AECOM who have been extensively cited in both the EIS, EIAR and Response for Further Information and whose work lies at the very foundation of the application.

We would request the Board to require the attendance of these firms so that certain aspects of the report can be clarified.

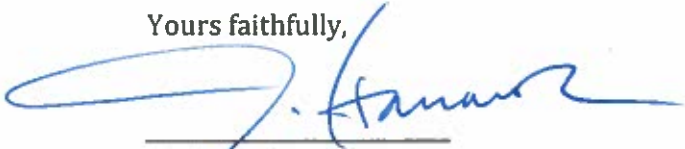
and at 78A Malahide Road (Opposite Griffith Avenue), Dublin 3, D03 C782. T. +353 (1) 897 3333 F. +353 (1) 853 0115

Anthony T Hanahoe, Michael E Hanahoe, Terence Hanahoe, Carthage Conlon, Robert Purcell  
Daniel Hanahoe, Una Gogarty, Marcus Hanahoe, Danica Kinane, Miska Hanahoe, Margaret Rice (Legal Executive)

Given the nature of this hearing, and the significant implications of this application for the City Centre and greater Dublin area as a whole, we trust we will be afforded this opportunity in line with the principles of fair procedure and natural justice.

If you require any further information please do not hesitate to contact Marcus Hanahoe of this office.

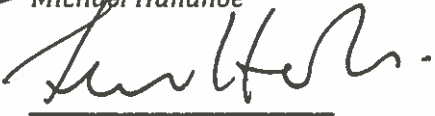
Yours faithfully,



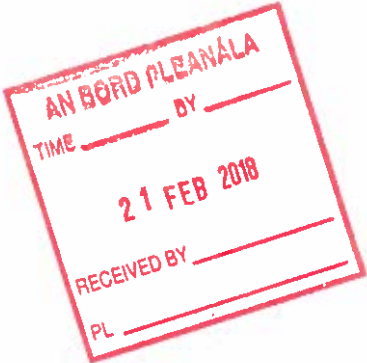
Anthony Hanahoe



Michael Hanahoe

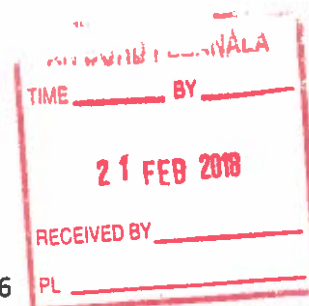


Terence Hanahoe



## List of Submitted Materials

1. Local Economic and Community Plan 2016 – 2021
2. Report of the Local Economic & Community Plan Action Plan 2016
3. Local Economic & Community Plan Action Plan 2017
4. Local Economic & Community Plan Action Plan 2016
5. College Green Re-alignment Scheme, Report to South East Area Committee, Proposed Park VIII Application dated November 2015
6. Dublin City Centre Transport Study Consultation Document dated June 2015
7. Dublin City Centre Transport Study Dublin City Council (2016)
8. Report to the Chairperson and members of the Transportation Strategic Policy Committee, Preliminary Report on Public Consultation on College Green Traffic Management Measures dated 24th June 2016
9. Dublin City Centre Transport Study Executive Summary Consultation Document June 2015
10. Dublin City Centre Transport Study Executive Summary
11. College Green Traffic Management Measures, Public Consultation Document April 2016
12. College Green Dublin City Centre Transport Study Executive Summary (undated)
13. NTA Draft City Centre Transport Assessment Study dated June 2013
14. Dublin City Council Summary of Responses Document September 2015
15. Common Appraisal Framework for Transport Projects and Programmes dated March 2016
16. Guidelines for the Management of Public Transport Investment Projects delivered by conventional procurement dated July 2010
17. Cost Management Guidelines for Public Transport Investment Projects dated 1 September 2010
18. NTA Cycle Network Plan dated December 2013
19. NTA Sustainable Transport Measures Grants Final Outturn Report 2014
20. NTA Sustainable Transport Measures Grants Final Outturn Report 2015
21. Dublin City Council, Spending and Revenue, Purchase Orders over 20k
22. Department of Transport, Department of the Environment and Dublin Transportation Office Traffic Management Guidelines
23. Greater Dublin Area Cycle Network Plan.
24. Dublin City Council 'The Heart of Dublin, City Centre Public Realm Master Plan June 2016
25. Department of Transport Design Manual for Urban Roads and Streets
26. NTA Transport Strategy for the Greater Dublin Area 2016 – 2035
27. Your City Your Space, Dublin City Public Realm Strategy
28. Regional Planning Guidelines for the Greater Dublin Area 2010-2022
29. Dublin Bus, College Green Public Consultation Submission Document 23 May 2016
30. College Green Public Consultation Document dated 11<sup>th</sup> April 2016
31. Smarter Travel A Sustainable Transport Future, a new transport policy for Ireland 2009-2020
32. NTA Cycling and Luas Cross City, Assessment of Cycling feasibility on the Luas Cross City Route
33. College Green Proposal, South East Area Committee, February 2016
34. College Green Proposal, South East Area Committee Presentation, February 2016
35. Millward Brown - Dublin Transport Study September 2016
36. Consumer Research Findings for the Dublin City Centre Transport Proposals



37. Imagine College Green on-street survey & online public consultation January 2017
38. College Green Civic Space Design Report by Dixon Jones & Paul Keogh Architects
39. College Green Civic Plaza Planning Application Proposal Drawings dated May 2017
40. CAAS Appropriate Assessment Screening Report for proposed College Green Traffic Management Measures
41. Letter from re: Report No. 307/2016 to the Lord Mayor and Members of Dublin City Council
42. North and South Quays Traffic Management Measures, report on public consultation
43. CAAS Environmental Impact Assessment Screening Report for proposed College Green Traffic Management Measures
44. Retail Strategy for the Greater Dublin Area 2008 – 2016
45. National Spatial Strategy for Ireland 2002 – 2020
46. College Green Traffic Management Measures Modelling Report dated October 2017
47. Dublin City Development Plan 2011 – 2017
48. Dublin City Development Plan 2016 – 2022