

AN BORD PLEANALA
 TIME 1407 BY [Signature]
 07 DEC 2017
 LTR DATED _____ FROM _____
 PL _____

17 Parliament Buildings
 Cork Hill
 Dublin 2

Re: PL29S.JA0039 New Civic Plaza at College Green Further Information Submission.

To whom it concerns,

I wish to make an observation on the further information submission in relation to the above application. I will restrict my observations to a number of points relevant to my particular position.

Vibration

The further information response in relation to vibration on Parliament Street states, in section 3.5.2.2:

The maximum measured vibration levels were 1.15mm/s and 2.75mm/s at locations V4 and V7. It was noted during the monitoring survey that these elevated levels coincided with the use of portable forklift trucks and were not associated with bus movements.

These vibration levels are significantly less than the stringent guideline value of 7.5mm/s at which no cosmetic damage should occur. During the passing of general traffic including buses significantly lower vibration levels were recorded.

It is considered that the existing traffic movement scenario on Parliament Street is acceptable and, rather, it is the proposed traffic movement (or non-movement) scenario that is of concern. The future scenario will have a vastly more significant number of heavy buses on the street (a 1000% increase from the current scenario is predicted by the applicant) and, given traffic signalling, said buses will be idling and revving at a more significant rate. This vibration is vastly different to the current acceptable vibration levels and has not been addressed by the applicant in their further information response. Using a speed of 25km/hr as set out in Table 5.2 is not a realistic target for the future scenario.

Rather, a model using stop-start on a constant basis with buses revving up and gearing up to make it through a traffic cycle with two sets of traffic lights in a c125m length would be an accurate reflection of what will be delivered by the proposed project.

It should also be pointed out that a model using trucks versus buses is not an accurate reflection of the current situation in which the predominant form of vehicle using Parliament Street is the car. Therefore Table 5.2 should be a comparison of vibration levels between cars and buses in a stop-start scenario. As stated in my original submission, to indicate the vibration impact of double-decker buses as being equal to that of cars is incorrect and does not take account of the impact of such large vehicles in vibration terms. I can confirm that there is no vibration impact in my building from car traffic but bus traffic has a significant impact. This is not considered acceptable from a residential amenity point of view and is not properly assessed in the EIS.

Of further serious concern in relation to the response about vibration modelling is that section 3.7.22 of the response, dealing with Dublin Bus and NTA queries states:

Dublin City Council, while being the Roads Authority, does not manage the bus fleet, or the licensing of the bus route network in Dublin. These are functions of the National Transport Authority. Dublin City Council is satisfied to accept two-way bus movements on Parliament Street once there is no breach of the EU air quality standards.

This statement would appear to indicate that the applicant envisages a potentially different traffic scenario than that tabled. Such a scenario may have potentially significant vibration impacts on Parliament Street, an issue that is not foreseen in the modelling and supposed acceptability of the tabled proposal.

It is also of concern that the serious emissions issues that originally discounted two way bus traffic on Parliament Street appear to be set aside on the basis that Dublin Bus will operate more environmentally friendly vehicles. There is no way that this can be enforced or required under the current application. For the Bord to consider an option that the proponent of the scheme indicated would have serious public health implications is of serious concern and is not in accordance with proper planning and sustainable development.

It is further noted that the 'do nothing' scenario outlined in further information request 2 does not appear to be also incorporated into the response to item 5.

Miscellaneous items

1. Figure 2.23 appears to indicate that private traffic will be able to use Parliament Street as an egress from the Fleet Street Car Park but this is contradicted by figure 2.34 which indicates a ban on non public transport traffic on Parliament Street from the quays.

2. In relation to section 4.10.2 of the response from the applicant, relating to my observation having regard to the provisions of the Dublin City Development Plan, it is considered that it is not accurate to concentrate on the fact that the physical works of the application do not extend to Parliament Street. As is quite clear from the application, and the Bord's response to the deficient nature of the original submission, the effects of the subject application extend far beyond the physical boundary of the site by virtue of potentially permanently altering the traffic movement scenario for the city centre beyond that envisaged and permitted under the Luas Cross City project.

The effect of the barring of public transport use on College Green will have a significantly detrimental effect on Parliament Street by virtue of the near continuous stream of double-decker buses (potentially in two directions should the scheme be further altered). This will have the effect of materially compromising the ability of Parliament Street to act in a manner envisaged and supported by the Dublin City Development Plan as set out in my original submission. The implementation of traffic movement changes required on foot of the subject application will deliver an environment in the Parliament Street area that is not conducive to pedestrian movement or lingering as envisaged in the Development Plan. It is disingenuous to state that the proposed project '*does not physically extend to Parliament Street/Cork Hill and does not impact on its pedestrian footpaths or network*' as it will clearly have a material impact on the pedestrian network's ability to deliver a satisfactory pedestrian route on Parliament Street as required under the Dublin City Development Plan and Public Realm Strategy.

It is also disingenuous to state that a separate Part 8 planning application has been prepared for the area as this permission relates to the roadway flanking Dublin Castle and City Hall rather than Parliament Street.

It is therefore considered that the applicant's response to this concern is not acceptable and does not address the issue at hand.

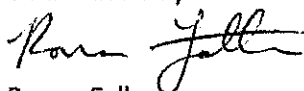
Conclusion

The proposed development, by virtue of the unnecessary and unjustified exclusion of bus traffic through College Green will have seriously injurious impact on the residential amenity of my home on Parliament Street/Cork Hill by virtue of the unacceptable increase in noise, vibrations, traffic and emissions that will result from the proposed traffic changes routing significant bus routes along the street.

It is considered that for the reasons set out above, and in my original submission, the proposal to omit bus routes through College Green has not been adequately considered in terms of its impact on general traffic flows in the city and, in my instance, in terms of the seriously negative impact it will have on Parliament Street/Cork Hill. The response to the request for further information does not provide any additional comfort in relation to this matter.

I would respectfully request that An Bord Pleanála, in the event of granting permission for the proposed development, requires its modification such that bus traffic continues to be accommodated through College Green as was envisaged in the permission granted for Luas Cross City.

Yours sincerely



Ronan Fallon

