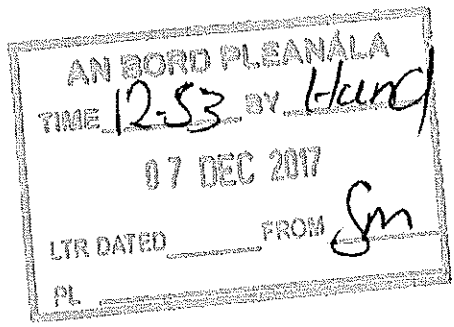


An Bord Pleanála
64 Marlborough Street
Dublin 1

5th December 2017

Dear Sir or Madam,



**Re : Further Submission to An Bord Pleanála in Relation to the Proposed Development of a New Civic Plaza and Ancillary Traffic Management Measures at College Green, Dublin 2
Application by Dublin City Council. An Bord Pleanála Ref. PL 29S.JA0039
Further Submission in consideration of the response of Dublin City Council to the Request for Further Information from An Bord Pleanála**

William Murray & Associates, Planning and Development Consultants, are instructed to lodge a submission regarding the response of Dublin City Council to the request for further information issued by An Bord Pleanála in connection with the proposed development of a civic plaza and ancillary traffic measures at College Green on behalf of the following city centre hotels;

- The Fitzwilliam Hotel, 127/128 St. Stephen's Green, Dublin 2
- The Marker Hotel, Grand Canal Square, Dublin 2
- The Merrion Hotel, Merrion Street Upper, Dublin 2
- The Shelbourne Hotel, 27, St. Stephen's Green, Dublin 2
- The Westin Hotel, Westmoreland Street, Dublin 2
- The Westbury Hotel, 2, Balfe Street, Dublin 2

We originally requested that an Oral Hearing be held in relation to the proposed development due to its potentially seriously adverse effects on the receiving environment and we still maintain that an oral hearing would help to clarify many of the issues surrounding this project.

We again request, as a matter of urgency, that the Board holds an Oral Hearing to allow businesses an opportunity to gain an understanding of the specific business impacts the plans have and to allow debate around some policies that could mitigate same.

Our original submission concluded that the subject hotels are seriously concerned in relation to the EIS and the plans to exclude taxis from College Green. The hotels consider that this will have seriously adverse consequences for access to the Grafton St. Quarter and that the exclusion of taxis from College Green would seriously impact on accessibility and ease of movement around the city and from the Airport and Dublin Port to the Grafton Street and central Dublin area.

On behalf of the subject hotels we asked that a re-examination of the impacts that the closure of College Green will have on accessibility in the city centre the City be carried out by way of: -

1. A comprehensive modelling exercise analysing the implications for traffic of the full range of traffic and transportation measures proposed for the City and
2. A proper study of the implications for taxis and taxi journey times of the closure of College Green and other transportation initiatives proposed by Dublin City Council

In the event that the Board were minded to a positive decision having had regard to the results of a comprehensive environmental assessment of the cumulative impact of the College Green proposal and the other current traffic management proposals which are being pursued, then the hotels asked An Bord Pleanála to make the following amendments to the scheme -

1. To allow for taxis both ways through College Green
2. Parliament Street to be made available for taxis both ways throughout the day
3. Taxis on the Nassau St / College St route should be allowed permanently and not just on a trial basis

In response to the need for traffic modelling an exercise has been carried out on behalf of DCC. This exercise took into account the closure of College Green and other traffic management measures which are proposed. It concluded that there would be significant traffic growth on many of the adjacent local roads. This of course has implications for journey times for taxis and also for taxi fares so that as well as having longer journeys in terms of kilometres travelled taxis servicing the hotels will also face increasing delays adding to the time spent getting to the destination hotel and to the cost of the trip.

It does not appear to have been recognised how important a role taxis play in the economic life of hotels. They are a primary mode of transport for tourists, particularly short term tourists, who do not have the time to come to grips with the operation of public transport and who want to get from A to B as quickly and as conveniently as possible. The requested study of the impact on taxi journeys of the closure of College Green was not delivered and it would appear that taxis in some instances will have to follow the routing for private cars. This is particularly evident in the case of Parliament Street where, although there is a lack of clarity around this point, taxis may not be allowed to use this 'public transport' corridor. It is essential that taxis be recognised as a core part of the city's public transport system and allowed continued access to all bus lanes.

A further point is the lack of certainty in relation to taxis using the north-south corridor between Nassau Street and Westmoreland Street. It is considered most unsatisfactory that taxis are only to be permitted to use this route on a trial basis. This facility could be withdrawn by administrative order of DCC at any time. There is no analysis of the impact of this scenario should it transpire. The subject hotels hold the view that this route should be available for taxis at all times. There are other ways of dealing with taxi misbehaviours such as stopping on a clearway etc. (i.e. under the existing road and taxi regulations) than threatening to ban them from the route.

The end result of the closure of College Green to taxis travelling east-west and west-east is to greatly increase the navigational difficulty, duration of trip and length of trip and hence cost for taxis traversing the city centre and circulating between points of interest and the subject hotels.

The hotels re-iterate their objection to the closure of College Green and would like to repeat their request that the scheme be amended by An Bord Pleanála to allow for the passage of taxis through College Green.

This point was considered as part of the DCC submission only to be dismissed in Section 4.6.2 as follows: -

The inclusion of taxis travelling east-west on College Green would fundamentally undermine the concept of a pedestrian priority civic space a specific objective of the Dublin City Development Plan 2016-2022.

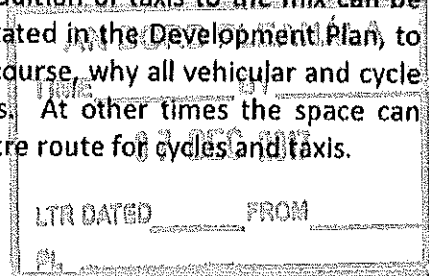
This would appear to be a statement of an opinion as no analysis is presented as to how such a proposal might be accommodated within the scheme. Objective SC08 of the Dublin City Development Plan 2016-2022 states as follows: -

SC08: To prioritise the redevelopment of College Green as a pedestrian friendly civic space, including the pedestrianisation of Foster Place.

The entire edifice of the College Green Civic Plaza proposal would appear to be constructed on the foundation of this objective – other objectives in various studies and plans have developed the concept but the statutory basis for the proposal would appear to be SC08.

It is submitted that this is an inadequate basis for such a radical intervention in the operation of the city transport network. If the development plan had intended that College Green be substantially pedestrianised then it would have said so – as it did for Foster Place. A pedestrian friendly space is a different concept and could quite successfully accommodate taxis and pedestrians in a managed environment. Such spaces have been successfully created in many European countries and involve traffic calming and appropriate signage and markings. The subject hotels can see no reason why this concept cannot be introduced in College Green.

College Green as proposed to be redeveloped as a Civic Plaza will accommodate a two way street for cyclists (6,500 per day) and a traffic route to Bank of Ireland. No doubt emergency vehicles and police vehicles will also have access. It is not clear if refuse collection will be provided for. It is submitted that the ideal of a pedestrianised zone to which DCC aspires has already been compromised by these provisions and it is submitted that the addition of taxis to the mix can be accommodated without adversely affecting the overall aim, as stated in the Development Plan, to achieve a pedestrian friendly civic space. There is no reason, of course, why all vehicular and cycle traffic cannot be excluded from the space for special occasions. At other times the space can perform its dual function as a civic space and an essential city centre route for cycles and taxis.

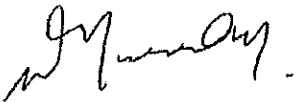


In conclusion we would submit

- That the exclusion of taxis from College Green will result in increased journey times and costs for tourists and other taxi users which will adversely affect the accessibility of the subject hotels
- That the foundation on which the proposal to ban all motorised vehicular through College Green is predicated is flawed in that the Development Plan envisaged only a 'pedestrian friendly civic space'. It is submitted that taxis can be accommodated safely and reasonable within such a space.

- That taxis should be permitted to travel in both directions through College Green
- That Parliament Street should be made available for taxis throughout the day and
- That taxis on the Nassau St / College St route should be allowed permanently and not just on a trial basis
- That taxis be recognised as a core part of the city's public transport system and allowed continued access to all bus lanes

We ask An Bord Pleanála, if it is minded to a positive decision in this case, to include the above points in its decision on the College Green project.



William Murray Planning and Development Consultant

