

## 4 Other Issues Raised in Submissions

### 4.1 Introduction

As part of the RFI, the Board have provided the applicant with the opportunity to respond to other issues raised in the submissions made to the Board during the public consultation period.

As part of this process, the applicant reviewed each of the submissions received and cross-checked each of the issues raised with the nine FI requests received from the Board. Where it was determined that an issue has not been addressed by any of the detailed responses to the FI requests, a response has been prepared.

The section replies on an issue-by-issue basis to those other concerns raised in the submissions made to the Board.

### 4.2 Cycle Parking

#### 4.2.1 Question Raised

It is the opinion of Irish Cycle that not enough cycle parking has been provided for within the Proposed Project. They suggest that more than double the amount of bicycle racks can be provided without impacting on pedestrian flows, emergency flows, seating area or event area etc.

#### 4.2.2 Response

Some 32 bicycle parking spaces are proposed within the plaza. This represents an increase of 6 spaces over and above what is currently available at College Green.

In considering a) the potential for additional cycle parking in close proximity to College Green and b) the objective of the design team to avoid visual clutter in an area of Historic importance, c) College Green's role as a venue for hosting mass events such as the New Year's Eve Festival requires that the provision of stands be minimised, it was considered that the provision of 32 bicycle parking spaces in College Green is sufficient to meet the needs of the Proposed Project.

The guidelines in the 2015 publication: '*Paving, the conservation of Historic Ground Surfaces (DAHG,2015:p49)*' were taken into account in this determination.

It should be noted that the Dublin City Centre Cycle Parking Strategy (Dublin City Council, 2015,

<https://www.dublincity.ie/councilmeetings/documents/s2443/12%20Dublin%20City%20Centre%20Cycle%20Parking%20Strategy%20RevE.pdf>) and associated Locations Report identifies potential cycle parking locations throughout Dublin city centre.

**Table OS.1** shows the top 10 ranked potential high density cycle parking locations and the associated potential parking capacity.

**Table OS.1: Potential cycle parking spaces in Dublin City Centre**

No.	Location	Potential Size (bicycles)
1	Drury Street Car Park	338*
2	41 and 46A O'Connell Street	200*
3	Connolly Station sites	200*
4	BusAras (underground bicycle parking, Amiens Street)	190
5	No.11 Burgh Quay/Tara Street	200*
6	Luke street (Tara Station)	200*
7	Pearse Train Station	160
8	No.163, 164 & 164a Capel Street	200*
9	48/50, Cuffe Street	200*
10	34 Camden Street Lower	150

\*potential to expand further

Sites such as the “The Mercantile” (South Great Georges Street), St Stephens Green Luas, Dame Street Square and O'Connell Street pedestrian median have also been identified as high demand locations.

These sites are part of the long-term solution to meeting cycle parking demand as it continues to increase in line with established mode share targets. Many of these are in close proximity to the site of the proposed College Green project.

Of the potential cycle parking spaces identified in the Dublin City Centre Cycle Parking Strategy (Dublin City Council, 2015), some 1,000 of these spaces will be provided by Dublin City Council by June 2018.

## 4.3 Surface Loadings and Finishes

### 4.3.1 Questions Raised

#### Surface Loadings

A concern was raised by both Councillor Ciaran Cuffe and Thornton O'Connor about the ability of the proposed surface materials to withstand loadings. Councillor Cuffe requests that the Board is satisfied that the plaza surfaces will be able to withstand the maximum loadings that may be imposed on it.

In addition, Dublin Town outlined the need to ensure that the materials proposed for street furniture are hardwearing and can withstand etching/vandalism etc.

#### Surface Finishes

Dublin Chamber and Reid Associates (for CIE) raised some concerns about the proposed surface finishes for the civic plaza. It is the opinion of Dublin Chamber that in order to make College Green a success, the surface of the plaza should be as pedestrian-friendly as possible, that the civic space should be easily traversable from any angle and the pedestrians should not be disadvantaged on account of old age, disability, or wheelchair use. However, Dublin Chamber is concerned that the charcoal granite setts which have been chosen as the primary surface material appear to have a rough and uneven finish as depicted in the design report and non-technical summary. They believe that similar to cobble lock, the resulting surface may not be conducive to free and easy movement for all pedestrians.

While the design provides for several narrow bands of smooth stone across the College Green, it is the opinion of Dublin Chamber that the elderly and disabled should not be crossing at these intervals.

In addition, Reid Associates raised concerns over the lack of coherence in considering the arrangement of contrasting surface materials and tonal colours (various shades of grey). It is their opinion that pedestrians with vision impairment who are able to discern shades and colours or surface materials are likely to experience difficulty in negotiating the plaza, particularly at the western end, despite the claims made in the Design Report (Section 4.06 Universal Access)

### 4.3.2 Response

#### Surface Loadings

An appropriate paving and sub-base material will be provided as part of the Proposed Project. In order to withstand regular traffic loading to the western end and occasional loading for events and emergency vehicles to the eastern end - new paving to the plaza will comply with the British Standard BS 7533-1:2001 series.

Appropriate street furniture will be proposed that is hardwearing and can be easily repaired/maintained in cases of vandalism.

#### Surface Finishes

The design team will reference the guidance in the 2012 publication *'Building for Everyone: A Universal Design Approach: External Environment'* (National Disability Authority, 2012) and will follow an approach in their selection and specification of suitable paving materials that will not discriminate against pedestrians regardless of age or ability. The granite setts used in the plaza will be appropriately even and smooth with appropriate slip resistance.

The choice in the design of the plaza layout was between rigidly delineated segregation of a cycle track that will require controlled crossing points for pedestrians, or a more flexible and accommodating **shared space** arrangement with pedestrian priority by default. It is envisaged that visually impaired pedestrians will be better accommodated in the shared space arrangement where the onus will be for cyclists to travel slowly and carefully through the plaza.

## 4.4 Trees, Street Furniture and Statues/Memorials

### 4.4.1 Questions Raised

#### Type, Height and Density of Trees

Concerns about the type, height and density of proposed new trees were raised. Brady Shipman Martin who are undertaking the development of the proposed new Central Bank Plaza development have concerns regarding their potential to restrict or block views from the Plaza to the West and the existing and proposed retail frontage, and the potential to adversely affect the emerging retail environment along Dame Street and College Green. Dublin Chamber also raised the concern that excessive foliage may obstruct the view of Dublin's most striking buildings and that consideration should be given to smaller scale trees. Temple Bar Residents suggested that whatever trees are planted should be 'deep-planted' so the root systems do not upend paving at surface level.

## Proposed Street Furniture

Temple Bar Residents have outlined in their submission to the Board that they would like to see even more public seating at the perimeter of the plaza, consistent with keeping the city's prime civic space free for major public events, such as the annual New Year's Eve festival, a celebration of sporting success or an address by a visiting head of state.

## Positioning of Thomas Davis Memorial

Temple Bar Residents are of the opinion that the Thomas Davis Memorial should be turned around so that the statue of this patriot is facing Dame Street, with the fountain in front, rather than facing towards Trinity College.

### 4.4.2 Response

#### Type, Height and Density of Trees

An overriding conclusion of the public consultation process was that people want to see trees in College Green; to make the space attractive and to contribute to biodiversity. The objective in removing the existing central trees is to open-up the views to Trinity from Dame Street and to free the centre of the space so that the principal facades (of Trinity College and the Bank of Ireland) can be appreciated from the centre of the plaza.

As outlined in Section 11.4.1.3 of the May 2017 EIS, it is considered that the existing mature trees at College Green tend to enclose the space and reduce the visibility of these heritage buildings and facades. The proposed planting of the semi-mature Plane trees is considered to be more appropriately placed so as not to divide and shade the plaza or restrict visibility of the Trinity building and the Bank of Ireland building.

The species of tree was selected in consultation with Dublin City Council Parks Department. A Key objective of the Dublin City Tree Strategy 2016-2020 (Dublin City Council, 2016) is to plant large-growing trees in large urban areas. It notes: "*while all trees are beneficial to an urban environment, it is the larger species (i.e. trees that can attain heights of over 15m) that are the particularly significant elements that can match and compliment the architecture of the city in scale and create great city places*" (DCC, 2016b: p36).

With regards the proposal to ensure all trees are 'deep-planted,' the Dublin City Public Realm Masterplan notes "*in order to support the health and longevity of street trees, adequate growing medium and structured tree pits will be incorporated to provide site specific solutions when trees are being planted in the city.*" (DCC,2016a: p24).

The Dublin City Tree Strategy 2016-2020 (Dublin City Council, 2016) notes regarding the following strategy to prevent pavement lift: "*flexible material to provide a smooth surface using asphalt or preferably resin bonded gravel (where appropriate) which will allow free flow of air and water to the root zone*" (DCC,2016b: p22).

## Proposed Street Furniture

Adequate demountable street furniture is provided as part of the Proposed Project to allow an amenity for the public and not to restrict the capacity for events and celebrations.

## Positioning of Thomas Davis Memorial

Following consultation with Dublin City Council's Public Art & Monuments Department and the Office of Public Works, who manage the Thomas Davis memorial, it was determined that the optimal position of the statue would be facing eastwards towards Trinity College Dublin, as it is currently. The statue will however, be moved further west and positioned on a new plinth in the centre of the proposed roundabout, also on the Dame Street axis.

## 4.5 Plaza Security and Public Events

### 4.5.1 Questions Raised

#### Plaza Security

Dublin Town and Dublin Chamber raised concerns about the security of the proposed plaza, particularly in relation to the potential for terrorist activity. Dublin Town suggested that the suitability of the proposed bollards and metal planters be assessed from a security perspective to ensure the maximisation of the security of the plaza having regard to the potential for terrorism acts.

#### Events

The concern was raised by Dublin Town that events that will attract significant numbers of people may impede pedestrian permeability and ultimately significantly compromise the ability of adjacent business to function. A 'pedestrian movement zone' would protect the continued permeability and connectivity of the plaza. Dublin Town request that the part of the plaza that is proposed to be utilised for events needs to be clearly delineated.

Transport Infrastructure Ireland (TII) have suggested the possibility of preparing a framework to manage events at the plaza and public toilets.

In addition, Trinity College Dublin expressed significant concern over the requirement for toilet facilities for the increased numbers of the public using the plaza. TCD requests that DCC review this again and consider how best to make toilet provisions for the public.

### 4.5.2 Response

#### Plaza Security

Chapter 17 of the updated EIAR contains an assessment of the risk of major accidents and/or disasters relevant to the proposed project. According to the assessment, the risk of unpermitted vehicles gaining access to the plaza is considered to be 'unlikely.'

The design of the plaza incorporates metal planters to the west of the plaza, where vehicles could gain access. These will hinder any vehicles entering the plaza from the turning circle, or from Church Lane. It is intended that at any public events/ gatherings or marches, these metal planters will remain in place. In addition, signage will be implemented which will indicate that the plaza is a pedestrian priority area.

As outlined in Chapter 4 of the EIAR, a Management Plan will be prepared and maintained by DCC in respect of the management and maintenance of the civic space. In addition, an application for outdoor public event licence will need to be approved by Dublin City Council in advance of an event taking place.

A number of discussions have taken place with An Garda Síochána in relation to security issues at the proposed College Green civic plaza and other public places in Dublin City, and a working group is being formed. The area has been risk assessed, and further details are available in Chapter 17 of the EIAR. These consultations will continue through the detailed design phase and any mitigation required by An Garda Síochána will be implemented at that stage, including physical intervention measures. In addition, as is current policy, policing plans will be prepared for any major public events.

## **Events**

In the case of events and public gatherings, a management plan will be developed to maintain access for adjacent business and emergency vehicles. Planning for such events will be carried out in consultation between businesses and Dublin City Council Events Department

As outlined in Section 4.4.3 or the May 2017 EIS, a Management Plan will be prepared and maintained by DCC in respect of the management and maintenance of the civic space and An Garda Síochána will guide Dublin City Council in the preparation of policing plans for everyday and any major public events.

It should be noted that temporary portable toilet facilities can be made available for large events and gatherings.

## **4.6 Access and Segregation**

### **4.6.1 Questions Raised**

#### **Taxi Access**

West Hotel Trading Company Ltd. are of the opinion that taxis should be permitted to use College Green at all times. They believe that taxis, as a minimum, should be able to use College Green during inter-peak hours, and particularly during evenings, when accessibility by vehicular traffic will increase natural surveillance and security in this large open area. They consider that the routing of taxis through College Green as suggested above is fully compatible with the safe routing of cyclists through the area, and should be acceptable to Dublin City Council, and ask An Bord Pleanála to make this modification to the scheme. A case is made that even if taxis could use College Green one-way westbound only, this would be a significant improvement to accessibility.

#### **Construction Access for Proposed New Central Bank Plaza Development**

Brady Shipman Martin (BSM) who are undertaking the development of the proposed new Central Bank Plaza raised the concern about construction traffic access, should construction of their development be operating concurrently. BSM recommend that a stakeholder liaison programme be implemented.

#### **Segregation of Temple Bar**

The concern was raised that the proposed re-routing of buses down Parliament Street would result in the segregation of the west end of Temple Bar. This issue was raised by four persons/organisations- Alexandra Covaci, John Weldon Auctioneers, The Larder and Wendy Crawford.

## 4.6.2 Response

### Taxi Access

The inclusion of taxis traveling 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 (Dublin City Council, 2016c: p.67).

### Construction Access for Proposed New Central Bank Plaza Development

As outlined in Section 4.5.4 of the May 2017 EIS, during the construction phase, site management measures including proactive communication with business and public regarding phasing, extent and duration of works will be required to be undertaken out by the Contractor, in consultation with Dublin City Council. This includes consultation with relevant stakeholders and the appointed contractor on the proposed Central Bank Plaza development. Access to all properties and to the Proposed Central Bank Plaza will be maintained during the construction phase. Signage and hoarding will be provided as necessary.

### Segregation of Temple Bar

Four objectors have referred to the potential for increased severance as part of the Proposed Project affecting the West End of Temple Bar (West of Parliament Street). This included Alexandra Covaci, John Weldon, and David Foran of The Larder.

Counter to David Foran's allegation that this was disregarded in the May 2017 EIS, this issue was considered in detail under the heading of Community Severance in the Socio-Economic Assessment. As well as highlighting the benefit of the scheme in countering severance between Grafton Street, Temple Bar and the north city, it noted (Predicted Impact):

*“...due to changes in the nature of traffic, with increased bus movement on Parliament Street and Winetavern Street, residents and business are likely to perceive there to be a marked change in the environment of the streets. Given that this change occurs on city streets that already heavily trafficked (and with no loss of footpath area or street trees) the impact is considered moderate negative and short-term.”*

The fact remains that Parliament Street has since the first version of the Temple Bar Framework Plan in 1991 been envisaged as a vehicular street with quiet and calmed side-streets running off it. The College Green Project entails that there is no change in that role or street hierarchy. Parliament Street does not currently function as a pedestrian street with outdoor cafes etc. lining the pavement.

The traffic analysis envisages a change in type of vehicle (buses and taxis) rather than private vehicles as well, but no change in the physical structure of the street is proposed. There is no measure proposed that will diminish access to pedestrians and footfall to business in its cafes, restaurants, markets and shops.

It is notable that the 'bus gate' on College Green has improved the environment by reducing the intensity of general private traffic currently in the vicinity. John Weldon's assertion that Parliament Street will become a "semi-permanent wall of diesel fume" is therefore not entirely accurate.

It is important to ensure business can get service deliveries, while at the same it vital that delivery vans do not block vital public transport corridors. Therefore, a structured approach to deliveries is proposed whereby businesses can be serviced before 11am. In addition, a loading bay has been provided on Essex Street to serve the area. It is clearly important to Dublin City Council that the balance between servicing local business and maintenance of unblocked transport routes is achieved.

## **4.7 Consultation and Public Notice**

### **4.7.1 Questions Raised**

#### **Dublin City Council Involvement**

Hanahoe Solicitors also raised the concern that Dublin City Council, who are the applicants, were relied on 'merely as a Consultee.'

#### **Transport Infrastructure Ireland (TII) Involvement**

TII also requested consultation with regards landscaping, tree planting, footpath/road improvements or other Luas Infrastructure in vicinity of Luas Cross City.

#### **Options Assessment Report**

Dublin Bus raised some concerns over the options assessment process. It is inferred that the justification of the emerging preferred option is unsuitable and ignores the design input and encroachment of the turning area. They also infer that the option doesn't provide for a full shared pedestrian cyclist plaza.

Dublin Bus also queried why the Options Assessment was not made available to the public during the consultation period.

#### **Public Notice**

The concern was raised by Hanahoe Solicitors that the public notice which was circulated for the Proposed Project was inadequate with regards the information provided on the proposed ancillary traffic works.

### **4.7.2 Response**

#### **Dublin City Council Involvement**

Dublin City Council Environment and Transportation and Architects Departments, as well as Dublin City Council Planning Departments made up an integral part of the project design team. All relevant DCC departments were represented at each design team meeting and oversaw design progression from its inception.

Dublin City Council Public Realm, Dublin City Councillors as well as other Dublin City Council Departments were then consulted, along with key stakeholders and statutory Consultees on the final project design. Those other DCC departments included, for example:

- Accessibility
- Chief Executive's Department
- Corporate Services Department
- Culture Recreation Economic Services
- Customer Services

- Dublin Fire Brigade
- Finance Department
- Housing and Community
- Human Resources Department
- Information Systems Department
- Law Department

## Transport Infrastructure Ireland (TII) Involvement

TII will be consulted with regards landscaping, tree planting, footpath/road improvements or other Luas Infrastructure in vicinity of Luas Cross City. However, works relating to the Proposed Project will only occur within the red line for the development, with minor works taking place in the vicinity of Luas Cross City. Any of these works will follow all the necessary guidelines for working in proximity to the Luas Cross City.

## Options Assessment Report

The 2016 Options Assessment Report, which was prepared by Clifton Scannell Emerson Associates (CSEA) is summarised in Section 2.4.3 of the May 2017 EIS and included in Appendix F.

The options which were considered in this report were, as stated in the May 2017 EIS, ‘public realm strategy options’ and the following justification was provided regarding the outcome of the most viable public realm strategy option (Option 12), refer to Section 2.4.3 of the May 2017 EIS:

- *This option provides a full shared pedestrian / cyclist plaza at College Green with cyclists being fully segregated from both buses and Luas facilities;*
- *The removal of the need for a pedestrian crossing for northbound / southbound pedestrian movements allows for a much more comfortable pedestrian environment without any delay;*
- *With the provision of a full plaza at College Green, there is greater scope for streetscaping and civic space development. A full plaza could cater for civic ceremonies as well as providing a space for meeting, idling, appreciation of buildings and monuments etc. This option does not require relocation of the monuments so the existing symmetry of the space can be retained; and*
- *This option presents the possibility of reducing cycle time at traffic signals outside Trinity College, thus improving services for northbound / southbound buses and Luas as well as allowing for a more frequent pedestrian stage between the proposed plaza and Trinity College.*

It is further stated, and is important to note, that the emerging preferred option- Option 12 was then “*further developed from architectural and traffic management perspectives to generate the Proposed Project.*” It is this stage of the process that involved design input and encroachment of the turning area. It also resulted in the full shared pedestrian cyclist plaza proposed.

With regards consultation, according to Section 4 of the Options Assessment Report, the options were developed “*based on various previous options and consultations with various sections in DCC, NTA, TII and Dublin Bus.*”

## Public Notice

The public notice published in respect of the Proposed Project was comprehensive and detailed providing the public with a clear understanding of the development.

Hanahoe Solicitors argue that the public notice “*identifies that a critical part to the development is the ancillary traffic management measures but the areas affected by these traffic management measures have not been adequately identified in the Public Notice*”

However, the scheme is introduced in the second paragraph of the notice as an “*application for approval for the development of a civic plaza and ancillary traffic management measures*”.

The second and third paragraphs of the notice focus on the site context and conservation objectives including lists of protected structures. The third and fourth paragraphs provide details of the development proposals regarding the plaza and traffic management works referred to.

The fourth paragraph of the notice states:

*“The scheme provides for the removal of the existing median incorporating a central taxi rank and street trees; existing statues are proposed to be repositioned within the site as an integral part of the design; and traffic management measures including the removal of east-west traffic from College Green. The taxi rank on Foster Place and bus stops on College Green/Dame Street shall be removed and facilities relocated. Trees on Foster Place are to be retained.”*

The fifth paragraph of the notice provides further clarity that

*“.....A new pedestrian crossing is proposed between the plaza and Trinity College entrance gates. A new row of trees is proposed on the southern edge of the plaza and a cycle path shall be provided on the southern edge. The intersection of Foster Place, College Green and Church Lane form a visual axis which will be emphasised by the relocation of the existing Thomas Davis monument at this fulcrum. The area from the junction with Church Lane westwards to the junction with Anglesea Street (c.0.21 Ha.), is to be defined as an architecturally treated street with a row of new trees on northern and southern sides, incorporating a bus turning circle (diameter c.24.5m). Minor road works are also proposed on Dame Street, Trinity Street, St. Andrew Street and Church Lane to include on-street loading bays and taxi ranks; overall site services, drainage measures and utilities.”*

We submit therefore, that an informed explanation of what the ancillary measures referred to as part of the proposed development entail is included in the notice. The statutory notice is entirely in accordance with the requirements of Part 10 of the Planning and Development Regulations 2001 as amended.

## 4.8 Luas Cross City

### 4.8.1 Questions Raised

#### Luas Cross City Reference

TII requested that the EIS Section 6.6.2.3 include the Luas in the listed public transport.

## **Tram Movements**

TII requested confirmation that the Luas Cross City will not be impeded by any re-routed traffic. TII also sought clarification that the impact of the length of pedestrian crossing will not impede the Luas.

Clarification was also sought on the statement that only two-way tram movements will be allowed between St. Stephens Green and Duke Street.

### **Compliance with TII Guidance and Works Permit**

TII outlined in their submission the requirement to comply with the 'Code of Engineering Practice for works on, near, or adjacent to the Luas light rail system' (Transport Infrastructure Ireland, 2004) during construction of the proposed project.

TII have also stated that a works permit is required to carry out works in proximity to the Luas Overhead Conductor System.

## **4.8.2 Response**

### **Luas Cross City Reference**

Section 6.6.2.3 of the EIAR now includes a discussion on the potential impact of the Proposed Project on Luas movements. This revision is noted in the 'Schedule of Amendments' as included in Appendix A.

### **Tram Movements**

The development of College Green will seek not to impede the Luas Green Line. College Green will remove a number of east west, west east movements from College Green/Lower Grafton Street, thereby reducing the number of competing movements and in fact assisting tram movements.

While the pedestrian phase may increase the number of competing movements at this location will be reduced thereby assisting tram movements.

It is envisaged that two-way tram movements will operate on Dawson Street, buses will be able to travel northbound from Grafton Street to Nassau Street, while general traffic will travel southbound from Duke Street and Dawson lane to Molesworth Street.

### **Compliance with TII Guidance and Works Permit**

The Code of Practice will be adhered to during construction. A works permit will be sought for works which will be carried out in proximity to the Luas Overhead Conductor System.

## **4.9 Environmental Impact Assessment Report (EIAR)**

### **4.9.1 Questions Raised**

#### **Assessment of Alternatives**

Hanahoe Solicitors also raised the concern that the assessment of alternatives carried out for the Proposed Project was carried out with regards the site, rather than the city as a whole. They infer that the approach that has been adopted which simply selects one area without any reference to how it might fit into an overall urban design framework is expressly contrary to the requirements of the Environmental Impact Assessment Directive.

## Indirect Impacts

West Hotel Trading Company raised the concern that the EIS fails to address indirect impacts.

## Shading Impacts

Difontaine's raised the issue of the impact of buses blocking the light at their premises on Parliament Street.

### 4.9.2 Response

#### Assessment of Alternatives

As outlined in Article 5 of Council Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment (The 'EIA Directive'), the information to be provided by the developer in an EIAR shall include:

*“a description of the reasonable alternatives studies by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment.”*

Chapter 2 of the May 2017 EIS clearly describes alternatives reasonable and relevant to the project and its specific characteristics. A description of the main reasons for the final chosen design is also provided taking into account the effects on the environment.

Section 2.4.3 of the May 2017 EIS outlines the public realm strategy alternatives considered, further detail is provided in Appendix F of this response. Section 2.4.4 of the May 2017 EIS outlines the traffic management alternatives considered. Section 2.4.5 of the May 2017 EIS outlines the architectural design alternatives considered.

Section 5.5.1 of the May 2017 EIS 'Planning and Policy' outlines how the Proposed Project fits within The Heart of Dublin City Centre, Public Realm Masterplan (Dublin City Council, 2016).

The Masterplan essentially identifies the gaps that need to be filled in order to deliver a unified pedestrian-friendly core, and sets out a list of projects that are realised to deliver this. A specific and detailed street-by-street list of public realm projects emerges through the analysis and consultation process. It specifically refers to the redesign of College Green as a civic space of national and city importance that has long been an objective of Dublin City Council.

Chapter 5 of the May 2017 EIS also describes how the Proposed Project complies with number of other planning and policy frameworks, such as the Dublin City Development Plan (Dublin City Council, 2016), the Dublin City Centre Transport Study (Dublin City Council, 2016), and the Dublin City Local Economic and Community Plan 2016-2021 (Dublin City Council, 2016).

It can therefore be determined that the Proposed Project has been considered as part of a collection of coherent, integrated plans, linked to a number of other spaces, areas and routes throughout the city. On this basis, the assessment of alternatives carried out in the May 2017 EIS is considered to be in compliance with the requirements of Council Directive 2014/52/EU.

## Indirect Impacts

Indirect impacts are fully assessed in the May 2017 EIS. The main indirect impact of the Proposed Project is the rerouting of traffic due to the removal access through College Green. These re-routings been assessed through the development of a traffic model, the results of which are contained in the May 2017 EIS with further details provided in the EIAR. The indirect impacts associated with the rerouting of traffic has been assessed throughout the May 2017 EIS particularly in Chapter 7, Air Quality and Climate, Chapter 8, Noise and Vibration and Chapter 16 Socio-economics.

## Shading

An output from the NTA ERM model has determined that during the do-minimum AM peak, on average a maximum queue of two vehicles will occupy the left turning lane on Parliament Street, with three vehicles occupying the right turning lane. For the do-something AM peak, one vehicle is predicted to be queuing in each lane. On this basis, the Proposed Project is predicted to result in less queuing on Parliament Street, following the implementation of the development thereby reducing the potential for shading.

## 4.10 Dublin City Development Plan Policies/ Objectives

### 4.10.1 Question Raised

#### Compliance with Dublin City Development Plan Policies/Objectives

Concerns about potential inconsistencies with Dublin City Development Plan (Dublin City Council, 2016) policies and/or objectives was raised by Muir Associates, Ronan Fallan, Thomas O'Connor and Hanahoe Solicitors.

### 4.10.2 Response

#### Compliance with Dublin City Development Plan Policies/Objectives

Some of the objections to An Bord Pleanála referred to planning policy objectives in the Dublin City Development Plan 2016-22 (Dublin City Council, 2016). This was referred to at length in the May 2017 EIS submitted to the Board.

The Dublin City Development Plan 2016-22 (Dublin City Council, 2016) and the Dublin Transport Study (Dublin City Council, 2016), set out a framework for the development of the city and its transport network. This strategy is not delivered in a single project but through multiple projects implemented by various actors, in both public and private sectors, over time. The College Green Plaza is a project within a policy context, but it is not policy and project at the same time. A public realm and transport strategy is not implemented by a single project in a single moment, no less than a housing strategy is never implemented in a single residential scheme. The reference to piecemeal development and project splitting is therefore not relevant in this context.

Hanahoe Solicitors state that policy SC2 of the Development Plan must be referable to the Medieval Street pattern. In fact, the policy does make any reference to the medieval period:

*“SC2: To develop the city’s character by cherishing and enhancing Dublin’s renowned streets, civic spaces and squares; to create further new streets as part of the public realm when the opportunities arise; to protect the grain, scale and vitality of city streets; to revitalise the north and south Georgian squares and their environs, and to upgrade Dame Street/ College Green as part of the Grand Civic Spine.”*

Policy SCO8 clarifies the Council’s objective is *“To prioritise the redevelopment of College Green as a pedestrian friendly civic space, including the pedestrianisation of Foster Place”*.

In addition, the objector is referred to policy SCO1 of the City Plan which states it is Council policy *“To implement a programme of environmental improvements along the Grand Civic Spine from Parnell Square to Christchurch Place, including College Green and Dame Street, arising from the opportunities provided by the introduction of the College Green Bus Priority System, the Luas Cross City and the ‘Dubline’ initiative.”*

Muir Associates submission for DCCTA and Hanahoe Solicitors do not refer to the extensive and detailed policy section set out in the May 2017 EIS, or rebut the comprehensive supportive policy structure for the Proposed Project. Rather they seek to base their objection on the basis that there is no reference to Policy CEE1 which states:

*“CEE1:(i) To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator.*

*(ii) To promote and enhance the city’s competitiveness and to address deficits, to improve the business environment so that existing jobs are supported and employment generated, and to be creative and practical in its responses to current economic challenges and opportunities.”*

While this policy is important as a general introduction to the Council’s overall economic strategy it is broad in nature. Policies CEE5, CEE7, CEE12 and CEE14 were referred to in the May 2017 EIS on the basis that in terms of Economy and Enterprise, the Dublin City Council Development Plan and the Dublin City Centre Transport Study emphasises that the quality of the city environment is an important element of its competitiveness and economic well-being and that these objectives are being considered by DCC and the design team.

The objection by Ronan Fallon concentrates on the potential impacts of the scheme on Parliament Street and Cork Hill. He refers to SC19 which states:

*“SC19: To promote the development of a network of active, attractive and safe streets and public spaces which are memorable, and include, where appropriate, seating, and which encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.”*

He also refers to policies on the Pedestrian Environment and network MT7 and MT12:

*“MT7: To improve the city’s environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges.”*

*“MT12: To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.”*

Green Infrastructure policies GI1 and ‘GI5: *To promote permeability through our green infrastructure for pedestrians and cyclists*’ are also referred to.

It is contended that all the policies referred to here are supportive to the College Green Plaza scheme. The Proposed Project does not physically extend to Parliament Street/Cork Hill and does not impact on its pedestrian footpaths or network. A separate Part 8 planning application has been prepared for this area. However, the College Green Plaza is a vital component of improving the city’s public realm space and improving network and permeability for soft modes.

We also note the submission by Thornton O’Connor on behalf of Dublin BID which refers to Chapter 7 which highlights the importance of retail health and they quote “*A healthy retail sector is central to a city’s success*”. While this is not a policy statement in itself, the College Green Plaza project has been conceived and designed to support the city’s retail sector by improving the quality of the city centre for retail customers. The May 2017 EIS quotes policies RD6, RD13, RD17 in this respect which includes “*RD22 To encourage environmental and streetscape improvement works conducive with the improvement of the pedestrian environment and the creation of better linkages within and between shopping areas in the city centre retail core in line with the objectives of ‘Your City, Your Space - Dublin City Public Realm Strategy, 2012’*”.