

David Curran

From: Bord
Sent: Thursday 7 December 2017 17:07
To: David Curran; SIDS
Subject: FW: IHF Submission - case reference PL29S.JA0039
Attachments: IHF Submission re An Bord Pleanála case reference PL29S.JA0039.pdf

From: Eoin Quinn [mailto:QuinnE@ihf.ie]
Sent: Thursday 7 December 2017 16:45
To: Bord <bord@pleanala.ie>
Subject: IHF Submission - case reference PL29S.JA0039

Dear Sir/Madam,

Please find attached a submission from the Irish Hotels Federation in relation to An Bord Pleanála case reference PL29S.JA0039 (Case Type: Local Authority Non Roads Development)

This a further submission following our original submission dated 29th June 2017, with which we enclosed the appropriate payment for the fee of €50.

I wonder would it be possible to confirm receipt of the attached?

Name of observer: Irish Hotels Federation
Address of observer: 13 Northbrook Road, Ranelagh, Dublin 6, D06 PK18
Subject Matter of the observation: Proposed development of a new civic plaza and ancillary traffic management measures at College Green, Dublin City Centre
Location of the development: College Green, Dublin City Centre
Name of planning authority: Dublin City Council
An Bord Pleanála case reference: PL29S.JA0039
(Submission attached)

Kind regards
Eoin

Eoin Quinn
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The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

7th December 2017

AN BORD PLEANÁLA	
TIME	BY
07 DEC 2017	
LYR-DATED	FROM
PL	

RE: Further submission by IHF in relation to An Bord Pleanála case reference PL29S.JA0039
Case Type: Local Authority Non Roads Development.

Dear Sir/Madam,

I'm writing on behalf of the Irish Hotels Federation (IHF) to make a 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. This follows our original submission dated 29th June 2017, with which we enclosed the appropriate payment for the fee of €50.

Background

The IHF, founded in 1937, is the national representative organisation of the hotel and guesthouse sector in Ireland, representing the interests of over 1,000 businesses. As a key stakeholder in Irish tourism, we work with our industry partners to ensure the right conditions are in place for the sustainable long-term development of tourism, thereby contributing to economic growth and employment creation throughout the country.

Given the important economic role played by tourism within the economy, it is vital that sufficient consideration is given to the potential impact of planning developments on the industry. As such, the IHF is very concerned about the cumulative adverse impact on Dublin hotels and the overall city centre economy as a result of transportation initiatives undertaken by Dublin City Council over the years which are increasingly reducing accessibility to hotels and Dublin City centre.

In particular, we are concerned that the proposed plans to exclude and restrict vehicular traffic from streets and local areas within the city centre will negatively impact on accessibility, thereby reducing the number of visitors, including high spend visitors, to the city and in general will make the City a more difficult place in which to do business. A further concern is that spending business and leisure travellers will choose other international city destinations due to ease of accessibility.

In our original submission we highlighted our serious concerns in relation to the Environmental Impact Statement (EIS) prepared by DCC and the plans to exclude vehicular traffic from College Green. We noted that the exclusion of taxis and chauffeur cars would have a serious impact on accessibility and ease of movement around the city from the Airport and Dublin Port. We asked the Board to re-examine the serious impacts that the closure of College Green would have on the City, including the Grafton Street quarter, and consider amendments to the scheme which would allow taxis and chauffeur cars to be permitted to use College Green in both directions and to allow Parliament Street to be available for use by taxis and chauffeur cars in both directions at all times.

In response to the need for traffic modelling an exercise was carried out on behalf of DCC taking 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 has implications for journey times for taxis and also for taxi fares so that, as well as having longer journeys in terms of distance travelled, taxis servicing affected hotels in the city centre would also face increasing delays, adding to the time spent getting to the destination hotel and to the cost of the trip.

There has been a lack of recognition of 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 one location to another as quickly and as conveniently as possible. A study of the impact on taxi journeys of the closure of College Green was not conducted 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.

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 unsatisfactory that taxis are only to be permitted to use this route on a trial basis as this facility could be withdrawn by administrative order of DCC at any time. There is no analysis of the impact that this scenario would have should it transpire. It is our view that this route should be available for taxis at all times and we would highlight that 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 effect of the closure of College Green to taxis travelling east-west and west-east will be to greatly increase the navigational difficulty, duration of trip and length of trip and hence the cost for visitors using taxis to traverse the city centre and circulate between points of interest and affected hotels. We therefore re-iterate our objection to the closure of College Green and repeat our 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 – while other objectives in various studies and plans have developed the concept, the statutory basis for the proposal would appear to be SC08.

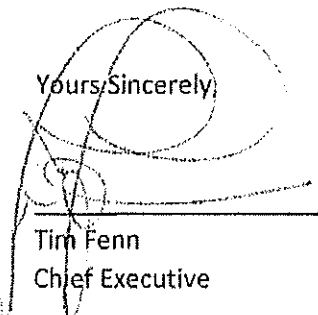
We submit that this is an inadequate basis for such a radical intervention in the operation of the city transport network. If the development plan had intended that College Green be substantially pedestrianised then it would have said so - as it did for Foster Place. A pedestrian-friendly space is a 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. There is no apparent 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 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. The option would still exist for all vehicular and cycle traffic to be excluded from the space to facilitate special occasions. However, at other times the space should perform a 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.
- That taxis on the Nassau St/ College St route should be allowed permanently and not just on a trial basis.

Yours Sincerely,


Tim Fenn
Chief Executive

AN BORD PLEANÁLA	
TIME _____	BY _____
07 DEC 2017	
CTR-DATED _____	FROM _____
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