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Dublin City Council
Development Plan Team,
Planning and Property Development Department,
Dublin City Council,
Wood Quay, Dublin 8

Date: 1st September 2022

RE: SUBMISSION ON PROPOSED MATERIAL AMENDMENTS TO THE DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

MATERIAL AMENDMENT REFERENCE NUMBER 7.16

Dear Sir/Madam,

1.0 INTRODUCTION

- 1.1 This submission is made on behalf of our client, Aviva Life & Pensions Ireland DAC, Building 12, Cherrywood Business Park, Loughlinstown, Dublin 18, D18 W2P5.
- 1.2 This submission relates to proposed material amendment reference number 7.16, which is as follows:

“Chapter 7

Section: 7.5.8 Public Realm

Page: 265 Insert a new Objective after CCUVO13, subsequent numbering to be amended accordingly

Amendment:

{Objective – Pedestrianisation South William Street}

{To support the full pedestrianisation of South William Street.}”.

- 1.3 Our client owns a number of properties on South William Street and as such has a significant vested interest in the future operation and appearance of the street.
- 1.4 Our client supports the concept of pedestrianisation on South William Street in principle, however it is submitted that it is essential that any such pedestrianisation scheme is undertaken in a planned and considered manner, and subject to appropriate and meaningful consultation with key stakeholders.

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- 1.5 It is considered that the material amendment should include reference to certain controls and safeguards to ensure that the proposed pedestrianisation is achieved in an appropriate manner.

2.0 BACKGROUND AND CONTEXT

- 2.1 It is noted that the proposed material alteration is on foot of a Councillor motion¹. The 'planning reason' for this motion is:

"Planning reason: to increase pedestrianisation in the City Centre and reduce our carbon emissions. Trials have already proved successful, the majority of businesses on the street are supportive and this should not be held up from progressing by one car park".

- 2.2 Our client wishes to clarify that they have not been consulted with in any way to date on the proposed pedestrianisation of the street.

- 2.3 The Chief Executive response² to the motion is:

"South William Street is already partially pedestrianised. Proposals for the street are set out in the Grafton Street Quarter Public Realm Plan, the implementation of which is an objective of the Draft Plan under Objective CCUVO15 (on page 266 of the Draft Plan).

The Grafton Street Quarter Public Realm Plan advocates for an extension of the delivery cordon delivering a pedestrian friendly area throughout the fine grain network of streets. Some locations are suitable for full or partial pedestrianisation, and streets, other than South William Street, may also be suitable on foot of ongoing feasibility / traffic studies.

In respect of South William Street, its full potential for pedestrianisation will go through feasibility before being brought to stakeholder consultation and Part 8".

- 2.4 The Chief Executive's Report and commentary is noted, particularly the final sentence which refers to a feasibility study, stakeholder consultation and a Part 8 process.

¹ Motion No. 7.14

² Page 282 of Chief Executive's Report on Motions received following Submissions made on the Draft Dublin City Development Plan 2022 - 2028

3.0 PROPOSED ALTERATION TO MATERIAL AMENDMENT REFERENCE 7.16

3.1 Whilst our client fully supports the concept and principle of the pedestrianisation of South William Street, it is essential that the pedestrianisation is part of a considered and high quality public realm upgrade to the street, delivered in a holistic manner through meaningful stakeholder engagement.

3.2 There are a number of challenges in terms of delivering pedestrianisation on South William Street, such as :

- Maintaining access to all existing properties at all times.
 - South William Street is currently one-way southbound. There are a number of side streets, such as Coppinger Row and Chatham Row (both one-way westbound) which access on to South William Street. Traffic arrangements for these side streets will be directly impacted upon by the pedestrianization of South William Street.
 - Access and servicing requirements will need to be carefully considered and facilitated.
- Ensuring that removal of public traffic from the street is delivered concurrently with public realm improvements for the street. Removing traffic only, without a public realm upgrade, would be a significant failed opportunity for the street.
- Pedestrianisation can deliver significant benefits, however it can also come with a number of potential spin-off negative impacts, such as late night noise and disturbance associated with spill out from bars and restaurants and bars. A mechanism for management and control of this potential impact needs to be considered.

3.3 Having regard to the above, it is respectfully submitted that pedestrian should not occur without:

3.4 An initial feasibility study to include:

- A process of meaningful public and stakeholder consultation
- Outline traffic management measures, including impact on surrounding streets and delivery/servicing requirements

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- A proposed public realm upgrade to allow for the aesthetic and functional improvement of the street, including mechanisms to manage and control potential nuisance on the street associated with the pedestrianisation.

3.5 It is noted that the Chief Executive's comments on the motion (No. 7.14) echo the above.

3.6 It is submitted that the above safeguards should be incorporated into the proposed material amendment to ensure that the objective includes an appropriate framework for delivering the pedestrianization scheme.

3.7 Having regard to the above, it is submitted that the proposed material amendment should be subject to the following alteration (proposed additional text in blue):

"Chapter 7

Section: 7.5.8 Public Realm

Page: 265 Insert a new Objective after CCUVO13, subsequent numbering to be amended accordingly

Amendment:

{Objective – Pedestrianisation South William Street}

{To support the full pedestrianisation of South William Street, subject to:

- 1. Stakeholder engagement*
- 2. A traffic management study to include an examination of impact on surrounding streets and service/delivery requirements*
- 3. A public realm upgrade proposal, including measures to address potential nuisance (e.g. noise and general disturbance to existing properties/tenants) on the street associated with pedestrianisation)".*

The pedestrianisation scheme shall be delivered through the Part 8 process. The Part 8 process shall include items 1-3 above and shall not be advanced in the absence of these items".

4.0 SUMMARY AND CONCLUSIONS

4.1 We respectfully request that this submission is taken into account in the consideration of material amendments to the Draft Development Plan.

Yours faithfully,

Robert Keran

Robert Keran

BSc Spatial Planning, BA (Law), LLB, MIPI

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