

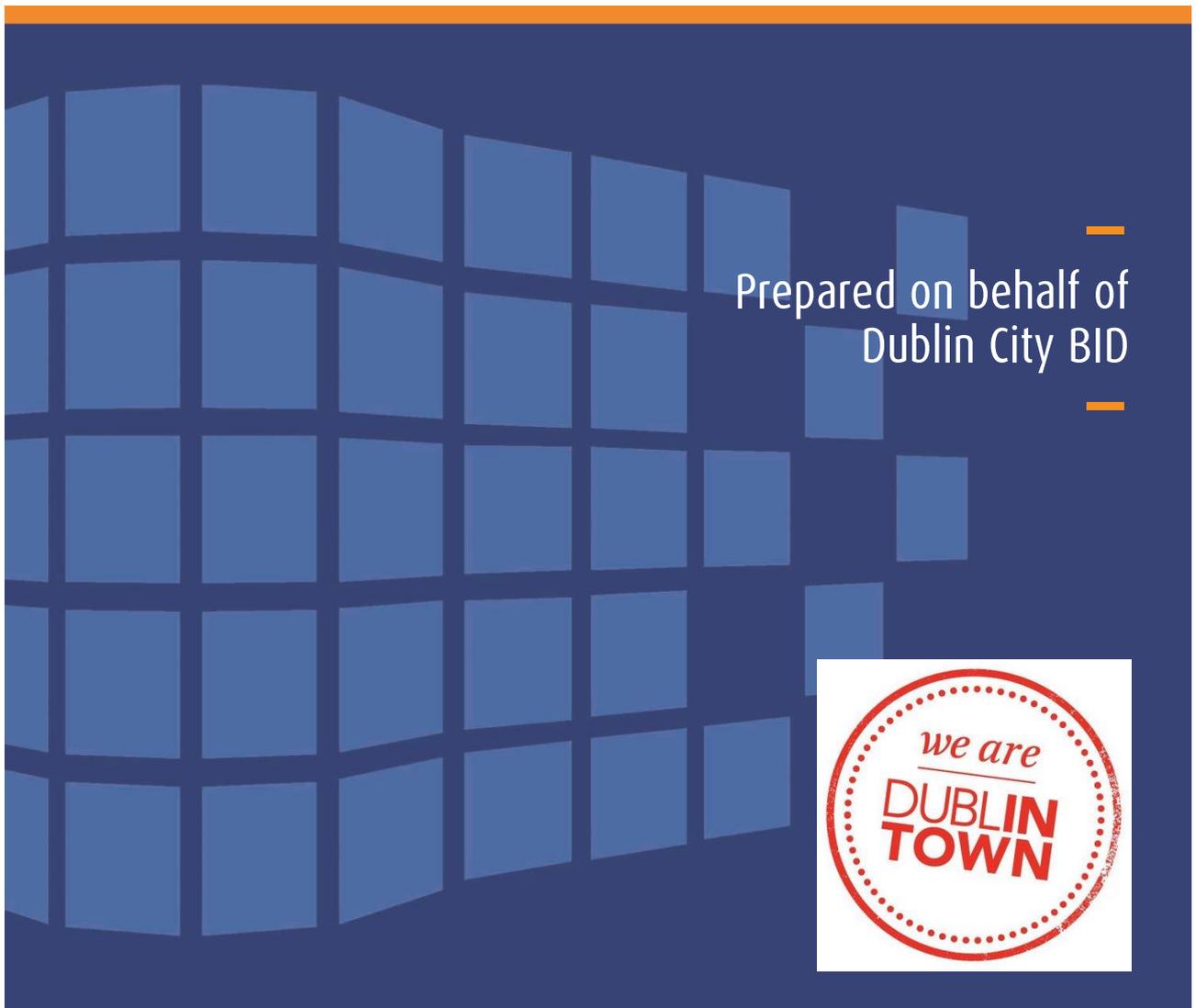


Luas Cross City Dawson Northbound Stop

Submission to An Bord Pleanála on an application for a Railway Order by the Rail Procurement Agency

An Bord Pleanála Ref. PL29N.NA0008

September 2014





1 Introduction

We are Dublin Town (the brand name of Dublin City BID) is pleased to make this submission to An Bord Pleanála in respect of the Railway Procurement Agency's (RPA) application for a Rail Order for the Luas Cross-City Dawson Northbound stop. *We are Dublin Town* has a mandate to develop and promote the economic advancement of Dublin City Centre and works on behalf of the 2,500 businesses in the central city area to create an attractive, welcoming, vibrant and economically successful space in Dublin City Centre.

The BID has taken an active interest in this scheme since the Rail Order was lodged with the Board in June 2010. This is the most significant infrastructure intervention for Dublin City centre perhaps ever, which the BID and our members fully support. It is our objective to make sure that the Luas Cross-City scheme will enhance the businesses and retailers along the route, and in this regard the BID has been in constant discussion with the RPA since the making of the Rail Order in 2012, in the common interest that the scheme can be delivered as efficiently and effectively as possible.

We are Dublin Town fully supports the current proposal to reinstate the northbound stop on Dawson Street. We have consulted extensively with business on Dawson Street, and surrounding area, and there is overwhelming support for this proposal.

It is the BID's position that the omission of the Northbound Stop on Dawson Street in the 2012 Rail Order was the wrong decision by the Board. There was widespread shock among the business community when the implications of the decision were realised. It appeared the business community were expected to absorb the disruption to the street and their businesses during construction, without the beneficial outcome of a new stop bringing customers to the street.

There was perhaps a complacency or expectation that the Rail Order would be approved for both stops on Dawson Street. The BID had not envisaged the omission of the stop as rationale or likely. However, in the period since August 2012 we have represented our members' interests to the RPA, to the effect that the reinstatement of this stop is essential for the city centre.

The BID is pleased that RPA has engaged with us, and listened to our representations, and understood our support for all parties seeking a resolution to the issue. We believe the revised scheme is a constructive response to the Board's previous decision, and addresses the Board's concerns.

The purpose of this submission is therefore to stress to An Bord Pleanála, the importance of this scheme for city centre business, visitors, and shoppers alike. It is now the intention of this submission to leave the Board in no doubt over the strength of support in the business community for this proposal.

We are Dublin Town has reviewed the EIS and technical proposals before the Board. We also engaged with the RPA in evaluation of alternatives. It is now clear that issues raised in the Board's omission of the stop in first place have been fully addressed in the new design and properly assessed in the EIS. The reinstated stop would have no negative impact on *the character and attractiveness of Dawson Street*, and the impact on pedestrian movement would be imperceptible. The only potential detrimental impact on the street's commercial viability, would occur if the Board do not make a positive decision in support of the northbound stop.

We trust An Bord Pleanála will take this submission into consideration in the making of its decision.



2 We are Dublin Town

We are Dublin Town is the Business Improvement District (BID) for Dublin City Centre. We are a not for profit organisation charged with creating a welcoming and economically viable city environment in Dublin. The BID has a mandate to develop and promote the economic advancement of Dublin City Centre and works on behalf of the 2,500 businesses in the central city area to create an attractive, welcoming, vibrant and economically successful space. The contribution of the businesses in this area to the exchequer is of the order of €1Bn. Per annum. The goal is to position Dublin City Centre as the location of choice for retail, leisure and business activity.

We are Dublin Town has developed a number of initiatives to create an inviting city; ensuring a safe and secure city and have developed a marketing and communications plan to promote the city centre to Dubliners and visitors alike.

Retailers and businesses are supportive of proposals to improve the city centre, expand the space available for customers, improve access to the city, and the quality of that access.

The consultation meetings made it clear that the businesses of Dublin City Centre are supportive of the light railway scheme and recognise that it is part of the long-term vision for a world-class city centre, of which they are an integral part.

BID members understand a goal of Luas Cross City is to also provide for urban renewal and street improvements.

3 Proposed Development

This project entails revised proposals for the northbound Luas Cross-City stop on Dawson Street. The Rail Order Application was lodged with ABP on 22nd July 2014. The stop in question was omitted from An Bord Pleanála's Railway Order (Schedule 14) for Luas Cross City (LCC), formerly Luas Broombridge (Line BXD), on 2nd August 2012. The rationale for that decision, and the changes made to the current scheme are reviewed below.

The current scheme is described at section 1.4.1 of the EIS as follows:

The proposed scheme involves the construction, operation and maintenance of a northbound stop on Dawson Street to support the operability of the Luas system. As there is already permission for a southbound stop on Dawson Street and associated light railway infrastructure, i.e. rails, Overhead Conductor System (OCS), etc. the proposed scheme allows for the construction of a northbound platform only in the area between Duke Street and Nassau Street.

In line with the other approved stop platforms for LCC, the proposed scheme stop platform will be 53m in length and will provide for the associated stop furniture. It will be located opposite the southbound stop on Dawson Street. The stop will have a ramp length of 6m from each end of the platform down to footpath level to facilitate access on to the platform for persons with impaired mobility.

There is no permanent or temporary landtake required for the proposed scheme. The area of the proposed Dawson Stop is approximately 228m² (during the operational phase of the proposed scheme) and is located wholly within an urban streetscape environment.



Section 1.4.2 of the EIS ‘Scheme Construction’ emphasises that *“the construction of the proposed scheme will be undertaken as part of the main infrastructure works for the approved LCC scheme. No additional enabling works over and above those included in the approved in the LCC Railway Order are required for the proposed scheme.”*

The rationale for the Board’s decision to omit the northbound stop in the 2012 Railway Order made reference to an *“excessive level of pedestrian congestion to the detriment of the street’s commercial viability”*.

We wish to impress upon the Board that footfall is the lifeblood of city centre business, and ease of access is fundamental to getting pedestrians to the city in the first place. The Board’s understanding of a street’s commercial viability was met with some perplexity by businesses. Commercial viability was diminished by severing this important transport stop from the scheme, rather than the contrary.

While we consider the findings of the EIS to be generally reasonable, in that it confirms that the proposed stop will have no significant impact on the environment, it does not sufficiently address the do-nothing scenario (i.e. the omission of the stop) which has a significant negative impact on business on Dawson Street and surrounds.

The EIS summarises the needs and objectives of the scheme at section 1.5:

The proposed scheme will serve a key destination within Dublin City Centre. By achieving greater penetration into the city centre area, the proposed scheme will offer increased accessibility to places of employment, education and retail centres as well as cultural and historic quarters. It will also improve the legibility of the Luas system for all users, including commuters, shoppers and tourists.

One of the benefits of light rail is the legibility of the public transport network with fixed routes in both directions and easily identifiable stops. The introduction of a northbound stop on Dawson Street would provide a corresponding stop to the previously approved southbound Dawson Stop, thereby enabling users of the system boarding or alighting at Dawson Street to easily identify the appropriate stop for their return journey. The issue of legibility is significant given the southbound stop’s location in the heart of the city and the potential variety of users of the system. If no northbound stop was provided then this would be the only location on the Luas system where there is no corresponding stop provided.

It is important to highlight that the RPA’s scheme, having gone through an extensive design review and alternatives exercise, is not seeking to replicate the proposal previously omitted by the Board, but is different in terms of location, design and impact. The EIS notes at section 1.5:

The scheme also seeks to address a key concern raised by the Board in their consideration of the Line BXD Railway Order application; namely that of pedestrian amenity on Dawson Street. The scheme as proposed is configured such that the lateral extents of the stop platform extend from the existing kerbline out into the carriageway, meaning that Luas customers either boarding or alighting at the stop would be removed from the influences of passing pedestrians on Dawson Street. In addition, the footpath on the west side of the street, from north of the proposed stop location, south to Anne Street South, is to be increased in width, further allaying any concerns over impacts on the street character due to increased pedestrian activity.

In summary, we consider the proposed development comprises a completely re-designed Luas stop, that addresses the Board’s previous reason for refusal, and should now be approved.



4 Dawson Street

This first section of Luas Cross-City entails significant changes to Stephen's Green, at the southern end of Grafton Street. This is the principal access point to the retail core of the city, the current end-terminal of Luas-Cherrywood, an important taxi-rank, drop-off location, and an access point to the Fitzwilliam Hotel. Pedestrian footfall at the southern end of Grafton Street is hugely significant.

Dawson Street is a street in transition. It has become one of Dublin's liveliest streets, where its proximity to the Grafton Street retail core has encouraged a clustering of restaurants and bars as well as retail, institutional and hotel use. Several units spill-out onto the street, providing outdoor seating for customers. It is as busy at night as during the day.

Traditionally, it is also a street of two-sides with very different character. Busy through-traffic caused significant severance, and an unsafe pedestrian environment making the road a dividing line. Whereas the west side of the street related to Grafton Street and Trinity College, the eastern side is more part of the Institutional/administrative core around Kildare Street. However, there are indications that as Luas has commenced construction works, and traffic volumes diminished, the west side of the street is becoming more accessible to customers and therefore more attractive to retail and cafes/restaurants.

Dawson Street is also a vital service artery for large scale retailers on Grafton Street as well as general businesses in the area providing a key access route for deliveries to a large number of retailers.

There is a high concentration of car parks in the area including; Q Park College of Surgeons and the Stephens Green Shopping Centre Car Park which have alternate access off Stephens Green, Q Park Setanta Place (access via Molesworth St and Frederick St South), and Q Park Dawson Street (School House Lane) are accessed off Dawson Street. Unhindered access to these car parks is paramount to the city remaining an attractive and convenient place to shop and do business.

Grafton Street has one of the highest footfalls of any shopping street in Europe, and Dawson Street performs an important complementary function to the street, not only providing services, but also access for customers via bus, taxi and car parks.

It is anticipated that the Luas works will reduce traffic flows, address severance, improve the pedestrian environment and in time rejuvenate the street. With the commencement of the Construction phase of the Luas (LCC) Dawson Street is effectively limited to access only, with previous heavy through-traffic redirected into Merrion Row. This has entailed a significant change to the current traffic flow regime in the city.

It is important to note that at the time the Rail Order was being considered by the Board in 2012, this traffic arrangement had not been properly assessed or indeed planned by the relevant transport agencies. It was therefore impossible for the Board to envisage how traffic arrangements would operate.

However, two years later it is now clear that the introduction of a right turn from St. Stephens Green east onto Merrion Row results operates extremely well and effectively, with a significant positive impact on Dawson Street.



5 Consultation

Under condition 10 (Schedule 14) of the Railway Order (2012) An Bord Pleanála imposed a mandatory requirement on the RPA to consult with *representative bodies of business in the city centre* prior to devising a pro-active public information strategy to function during the construction phase.

We are Dublin Town operating as Dublin City BID facilitated a number of consultation meetings throughout November 2012, providing the RPA an opportunity to present city centre businesses with information on the current status of the LUAS Cross City scheme, details of the route through the city centre and an overview of the construction proposals and timescales.

The following meetings were organised by the BID and were well attended by BID members, as well as the consultants and BID staff.

- Dublin BID Board, Dublin BID office, 24th October
- Stephen's Green/Dawson Street/Nassau Street – The Mansion House, 7th November
- College Green/Westmoreland Street – Dublin BID office, D'Olier Street 9th November
- O'Connell Street/ Parnell Square/Parnell Street – Murray's Bar, 13th November
- Marlborough Street – Abbey Theatre, 14th November

Following the presentations by the RPA, Dublin City BID undertook surveys to identify and collate particular issues raised by its members. The BID subsequently issued a detailed report dated 28th January 2013, in which a broad range of issues arising from the Luas Cross-City construction phase were identified.

An Bord Pleanála's omission of the proposed Northbound Luas stop on Dawson Street emerged as a significant issue for businesses on Dawson Street, and a strong consensus emerged in support of the reinstatement of a stop on the street as part of the current scheme.

We appreciate the RPA's proactive engagement with Dublin City BID members and city centre business generally, and the careful review of the submissions made, and continuing efforts to engage with and communicate throughout the construction period. It was encouraging that the RPA took heed of the importance of the Dawson Street stop issue for businesses, and have taken steps to review the matter, and examine feasible options for the stop's reinstatement as part of the wider scheme.

Dublin City BID engaged with the RPA on behalf of the businesses in the Dawson Street area on the subsequent presentation of Alternatives. Following a briefing on 24th April 2013 by consultants Leigh Fisher (for the RPA) on the three options identified for a northbound stop (Railway Order Southbound stop retained), Dublin City BID made a formal submission to the RPA, with independent analysis of the stop options.

In our submission to the RPA, we concluded that the Alternative location *Between Duke Street and Nassau Street (opposite Southbound stop)* was the most favourable option. We highlighted that it presents good access for businesses on the street, and has a primary access to Grafton Street. The visual impact on the built fabric is not severe in this location, and the intensity of pedestrian use *vis a vis* the ground floor uses did not present the same potential for pedestrian conflict. The stop appeared to be sufficiently set-back from the Nassau Street junction, which according to Leigh Fisher consultants, was technically viable in terms of traffic queuing.

The BID is pleased that the RPA pursued this stop option to detailed design, and formed the proposal for the Railway Order now before the Board. Dublin City BID continues to engage with the RPA, Dublin Bus and Dublin City Council to promote communication of these important issues, and help engage with businesses and resolve issues for this important infrastructure for the city.

6 Review of Impacts

The northbound Dawson Street stop was omitted by An Bord Pleanála in the Railway Order in August 2012. This section of our submission considers the rationale for the omission of the stop, the response to those issues in the revised design, and the assessment in the EIS of the key issues.

Reviewing An Bord Pleanála's reports and decisions highlights that there are some important issues to consider. The following is the Condition for Dawson Street contained in the Rail Order (Schedule 14).

1. Dawson Stop

The northbound Dawson Stop shall not be constructed as proposed. The southbound stop on Dawson Street is confirmed. The tracks shall be realigned on Dawson Street to take account of this modification. Details of the revised track alignment (including traffic markings etc.) shall be agreed with the planning authority prior to commencement of construction.

Reason: It is considered that the character and attractiveness of Dawson Street would be unduly compromised by this stop, which, taken in conjunction with the existing bus stops on this pavement, would also create an excessive level of pedestrian congestion to the detriment of the street's commercial viability. [our emphasis]

The Board gave a detailed explanation of their decision in Schedule 15 of the Railway Order, wherein it is clear that they were opposed to an alternative 'island platform' stop:

“Dawson Street Stop *Having considered the Inspector's initial report (September 2011) the Board was concerned, given the existing conditions on Dawson Street and the existing levels of pedestrian activity on the western side of Dawson Street (owing partly to bus stops) that the proposed northbound stop might have negative consequences for pedestrian movement, bus movement, and the amenity of the street in general. The Board requested the RPA to present a design and assessment for an 'island platform' at the northern end of Dawson Street, as had been recommended by the Inspector. Various parties, including Dublin City Council, Dublin Bus and the National Transport Authority made submissions on this alternative. The Board tended to agree with the above mentioned parties that the island platform option would conflict with city bus services, and would also potentially reduce safety levels for pedestrians at this location. Displacement of the numerous affected bus routes to Kildare Street on a permanent basis, as preferred by the Inspector, was not considered to be within the Board's remit, and in any case the negative consequences for bus patrons would need to be further considered. Having examined the issue in detail, the Board considered it appropriate in the interests of the proper planning of the area to omit the northbound (i.e. inbound) stop on Dawson Street, notwithstanding the impacts of this omission on the LUAS patrons. It was considered that the stops at St. Stephen's Green and Westmoreland Street would be capable of catering for the additional demand created by this condition without undue impacts. The omission of this stop would also provide an opportunity for the proposed track alignment to be revised on Dawson Street, which in itself might reduce the extent of shared running with existing bus services.” [our emphasis]*

We also note that the Inspector Recommended to the Board in his Addendum Report 2012 that an alternative location on Dawson St was viable. The Inspector has recommended that an alternative stop arrangement be provided by way of the following condition:



1. *The Dawson Stop shall not be constructed as proposed. The proposed offset lateral platform arrangement shall be replaced by a single island platform located at the northern end of the street, between Duke Street and Nassau Street, and generally in accordance with the plan and section details indicated on Drg. No. 0001 Rev. B01 submitted to An Bord Pleanála on 29 March, 2012. Details of the design of the revised stop and the adjacent areas up to and including the Dawson Street/Nassau Street junction, and which shall include appropriate traffic calming measures, pedestrian facilities and traffic signal adjustments, shall be agreed in writing with the Planning Authority prior to commencement of the Dawson Street element of the Railway Order. In default of agreement, the matter shall be referred to An Bord Pleanála for determination.*

Reason: *It is considered that the proposed northbound platform would have an adverse impact on adjacent sensitive land uses and that there is a viable alternative location for the stop at the northern end of the street.*

Having regard to these statements, and a full reading of the Inspector's Addendum report PL 29N.NA0004(A) of June 2012, it is clear that the problem stems from a very narrow scope of alternatives considered at the that time. In effect the Board asked the relevant parties to comment on only one alternative to that proposed; an island platform. The island platform alternative presented many technical difficulties for bus operators and was untried in the Luas network for shared running. Therefore, when presented with information that raised question marks over the viability of an island platform alternative, the Board were not confident that all issues had been resolved.

The proposed northbound stop now before An Bord Pleanála has been developed in complete contrast to the 'island platform' previously considered. Multiple stop alternatives were developed and analysed by the RPA's consultant's Leigh Fischer. The RPA have consulted with transport operators, as well as businesses concerning the optimum solution. So rather than being presented with only one alternative option, the Board have before them a considered stop proposal that is the outcome of a comprehensive process and expert assessment. The proposed north-bound stop has been tested in terms of traffic impact and pedestrian movement, and the evidence before the Board is that scheme is efficient in design, and will not have any negative impacts (socio-economic or environmental).

Transport and Pedestrian Impact

As noted in the above extracts from the Railway Order, the potential impact on pedestrian flow and 'congestion' are important considerations for the Board.

We are pleased to observe that the EIS provides a comprehensive assessment of the impact of the proposal in terms of traffic, public transport and pedestrian movement. This level of detail is of considerable benefit to all parties reviewing the proposal.

We note that the EIS concludes in Section 12 that the proposed development's impact on pedestrian movement would be 'imperceptible'. This is on the basis of a comprehensive assessment using the VISSIM pedestrian model.

Similarly the impact on traffic is assessed as 'imperceptible', and it is noted that bus traffic on the street is to fall by approximately one third of that originally envisaged in the RPA's EIS for the whole LCC scheme.

With regard to servicing, the EIS does note at section 12.4.5.4 that the proposed scheme provides less loading facilities (13m). The impact on servicing is considered to be slight (effects that are locally significant).

The Socio-Economic assessment of the scheme provides a detailed and comprehensive overview of the proposal on the street and the activities associated with it. It notes at section 10.3:



The stop would be configured such that:

- The lateral extents of the platform would extend from the existing kerbline out into the carriageway, meaning that Luas customers either boarding or alighting at the stop would be removed from the influences of passing pedestrians on Dawson Street, thereby mitigating pedestrian congestion
- The footpath on the west side of the street from north of the platform location, south to Anne Street South is to be increased in width, mitigating impacts on the street character due to increased pedestrian congestion
- The revised stop arrangement makes provision for an additional signalised pedestrian crossing in close proximity to the Duke Street junction. This will provide for a total of four signalised crossing points along Dawson Street from St. Stephen's Green to Nassau Street. This provision of signalised crossings along with the significant reduction in the vehicular traffic consequent upon the implementation of LCC will significantly improve pedestrian amenity on the street and offer greater accessibility to the eastern side of the street and the commercial and cultural areas beyond
- The bus stops that currently exist at the location of the proposed stop would be transferred to a location further south on Dawson Street
- The numbers of bus movements on Dawson Street would be significantly reduced
- Loading bay opportunities would be provided in conjunction with bus laybys to service adjacent business premises

The provision of a northbound stop on Dawson Street is desirable in order to enhance the attractiveness of the proposed LCC scheme as a public transport mode choice. The proposed Dawson Northbound Stop has wide support amongst the local business community and offer greater accessibility to the eastern side of the street and the commercial and cultural areas beyond

We further support the statement at 10.3 of the EIS in the evaluation of socio-economic impacts:

Efficient, reliable public transport services with frequent stops is beneficial to businesses and to individuals who use the services provided by those businesses. This is a quality of life issue which is an appropriate socio-economic consideration. It was anticipated that the interconnecting streets near Grafton Street, including Dawson Street, Anne Street South and Duke Street and interconnecting lanes, would experience an increase in footfall and would benefit from a diversion of shopping trips into the core shopping area. Improved accessibility to community and social facilities were noted, including commercial, public, financial and professional services, educational facilities, social facilities and other amenities frequented by residents, commuters, shoppers and visitors to the city.

The EIS contains further important statements at section 10.6.2 in consideration of the Operational Impacts of the proposed development:

The proposed scheme will enhance the economic wellbeing of the Dawson Street area through increased accessibility for workers, shoppers and visitors and is likely to further increase the attractiveness of the overall area as a place to do business. The proposed scheme will greatly improve the connectivity between the key retail areas of Grafton Street and Henry Street in Dublin City Centre and will facilitate lateral retail spread in the South City Retail Core area. This will serve to enhance the city centre's retail environment and will support the retail policies and objectives promoted by Dublin City Council (DCC) in the Dublin City Development Plan (DCDP) 2011–2017. The provision of the proposed scheme will make the core city area more accessible by public transport and by foot. Accessibility



and footfall are recognised as key factors in optimising the Dawson Street retail and business performance as a destination

.....The potential impact on pedestrians was assessed in the Human Beings: Traffic and Transportation chapter of this EIS (Chapter 12) and the assessment indicated that the design provided for the relocation of a pedestrian crossing and an additional pedestrian crossing in the area and has also provided for the widening of footpaths, generally from 2.2m to 4.6m width along Dawson Street west in the area of the stop and bus stop. The general widening of footpaths adjacent to the platform and to the relocated bus stops will mitigate local congestion during peak periods and will improve pedestrian amenity during offpeak periods, both day and night. As a result of these design mitigation measures, the impact on pedestrians due to the proposed scheme is considered to be insignificant.

7 Conclusions

By way of conclusion *We are Dublin Town* wish to emphasise that the revised Luas Stop scheme before the Board is one that has been developed in consultation with business on Dawson Street, and with strong support for the reinstatement of the stop in the Luas Cross City.

We greatly appreciate the efforts made by the RPA and the NTA to reconfigure and reassess the proposal, and reach a solution to the Board's stated concerns on the previous northbound stop proposal.

We consider that the EIS provides a robust assessment of the scheme, and that transport and pedestrian modelling has ensured to address concerns regarding the technical viability of the proposal.

Our only criticism of the EIS is that the impact of a do-nothing scenario could be stronger. The omission of the stop has severe implications for businesses, visitors and workers alike. We consider it relevant to point that the non-implementation of this revised stop proposal would have a detrimental impact on the commercial viability of Dawson Street.

We have noted that Dawson Street is a place in transition, and is experiencing considerable disturbance at present through construction activity. However, we maintain that the changes are positive, and support our vision of a world class city core. With reduced through-traffic, a world class light-rail service, the investment in street amenity and a variety of new and improved offices, shops, bars and restaurants, Dawson Street will emerge as a wonderful place at the end of this process.