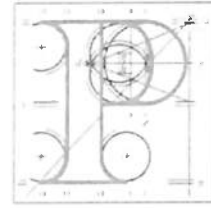


Our Case Number: ABP-317679-23
Your Reference: Amphitheatre Ireland Limited



An
Bord
Pleanála

John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

Date: 15 April 2024

Re: Ringsend to City Centre Core Bus Corridor Scheme.
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1,
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
11 APR 2024	
Fee: €	— / — Type: _____
Time: 16.01	By: hand

Date: 11th April 2024
Our Ref: JN BC 23135

Dear Sir/Madam,

ABP Ref.: ABP-317679-23

RE: **SUBMISSION TO AN BORD PLEANALA IN RESPECT OF SECTION 217B
IN RELATION TO THE SUBMISSION BY THE NTA FOR THE
CONSTRUCTION OF THE RINGSEND TO CITY CENTRE CORE BUS
CORRIDOR SCHEME**

Introduction

On behalf of our client, Amphitheatre Ireland Limited, 3Arena, North Wall Quay, Dublin 1, we wish to make observations on the submission dated the 29th November 2023 made by the National Transport Authority to An Bord Pleanála in respect of the Ringsend to City Centre Core Bus Corridor Scheme.

A letter was received from An Bord Pleanála on the 7th March 2024 which states that an Oral Hearing will not be held with respect of the above application. The letter goes on to state that *"the Board hereby considers it appropriate to invite you to make a submission in accordance with Section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 29th November 2023 received from the National Transport Authority."* This submission is therefore being made in response to this letter which is included as Appendix 1 of this submission.

Submissions are invited until 5:30 p.m. on the 11th April 2024.

This submission is accompanied by a Technical Note by Waterman Moylan which is included as Appendix 3 of this submission. The Board's letter states that no additional fee is required for making a submission. The following enclosures are included with this application:

- Appendix 1: Letter from An Bord Pleanála
- Appendix 2: NTA's Response to Submission
- Appendix 3: Technical Note prepared by Waterman Moylan

Managing Director: John P. Spain
Executive Directors: Paul Turley | Rory Kunz | Stephen Blair | Blaine Cregan | Luke Wymer
Senior Associate Directors: Meadhbh Nolan | Kate Kerrigan | Brian Coughlan | Ian Livingstone
Associate Directors: Tiarna Devlin

The 3Arena is one of Dublin's largest and most significant live event venues, synonymous with live music and is one of the busiest venues in the world, often ranking internationally within the top 10 busiest venues, with average footfall (as of 2019) of 850,000 patrons per year, with up to 150 events each year. The 3Arena can host up to 14,000 fans in its Amphitheatre style auditorium, and includes 4 separate club and bar spaces. It is one of the main event spaces in Dublin and has an established history of presenting frequent performances by some of the most popular international artists.

Typical events hosted at the 3Arena include Assemblies (political conventions, religious gatherings and seminars), concerts, displays (exhibitions, fashion shows, dinners and product launches), sports (boxing, tennis, wrestling, badminton, darts, etc) and theatre (ballet, dance, circus, drama, musicals and opera).

When the venue is in use for events, it is a significant generator of traffic due to people travelling to the venue by both public and private means of transport. Given the nature of events which take place, these peak flows tend to happen at times clustered around the start and end of performances. With trip generation clustered into narrow windows of time, it is imperative to ensure that this is not inhibited and in particular that trips can continue to be effectively managed throughout the construction period. There are also large numbers of patrons who walk along North Wall Quay and Custom House Quay from the 3Arena to the public transport hubs in the city centre.

For performances, a purpose built service area which acts as a loading and unloading area for the materials required as part of any large performance. This service area is located directly adjoining the venue to the west with access off Point Square via North Wall Avenue. There is additional service yard access from North Wall Quay. Peak usage is in the days leading up to and following shows and events.

Submission

An extract of the NTA response to our client's submission made is included as Appendix 2 of this submission.

A Technical Note has been prepared by Waterman Moylan and included with this submission. The note provides a summary to the NTA's response to the previous submission as follows:

Submission	NTA Response
Planning Conditions	Issue not addressed in response
Scheduling of Works	Issue not addressed in response
Working Hours	Working hours after 9pm at discretion of contractor.
Deliveries and Waste Collection	Deliveries via Sherriff Street
Production Deliveries	Deliveries via Sherriff Street
Audience Movements	Issue not addressed in response
Right Turn to North Wall Ave	Request not agreed to in response.
HGV Zone	Deliveries via Sherriff Street
Relocation of Bus Stops	Request not agreed to in response.
Alternative Access	Issue not addressed in response

The note welcomes the confirmation from the NTA that the access to service yards from North Wall Quay and from North Wall Avenue will be maintained throughout the construction phase. Additional points made in our client's original submission which have not been addressed satisfactorily in the NTA's response are addressed again in WM's accompanying note. These points are summarised as follows:

Disruption to Audience Movements

The potential disruption to events at the 3Arena as a result of the construction phase of the bus corridor have not been addressed in the NTA's response. Given the scale of events that take place at the 3Arena, it is considered imperative that specific measures are incorporated into the scheme to ensure that clear and safe access for large crowds are provided. This is particularly important given that all attendees must access the site by foot and/or public transport. The late night working hours past 9 p.m. are of particular concerns when patrons will be exiting the 3Arena after an event.

The WM note states that *“should this project receive planning approval, An Bord Pleanala is requested to include a specific condition or conditions that the Contractor must have regard to and accommodate all movements, both vehicular and pedestrian, generated by events at the 3Arena throughout the construction period including the safety of audience arrival to and departure after an event and that the operators of the 3Arena are contacted on these matters.”*

Alternative Access

WM note that *“The NTA Response does not address the provision of a suitable alternative access should the normal access route for deliveries and audiences be impassable as a result of construction works for the proposed corridor.”*

In the absence of provision of this alternative access from the application, a specific condition is requested by WM that *“the Contractor must at all times provide a suitable and safe access*

for audiences to the 3Arena in the event the normal access is impassable due to construction works and that the operators of the 3Arena are contacted on these measures.”

Previous Submission

It is also requested that all of the concerns raised in the previous submission made on behalf of our client are taken into account when making a decision on the proposed BusConnects Scheme.

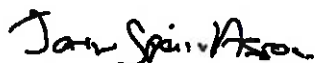
Conclusion

In conclusion, our client, Amphitheatre Ireland Limited, operates the 3Arena, which is Ireland's leading dedicated arena and event space, forming one of the country's largest and best-known cultural venues. As previously emphasised, high-capacity events with large crowds are a regular occurrence at the 3Arena, often with multiple events taking place each week.

It is considered that any proposals should ensure the safe access and exiting from the site after events for patrons and deliveries. This is a reasonable request.

We trust this submission will be taken into consideration by An Bord Pleanála.

Yours sincerely,



John Spain Associates

APPENDIX 1: ABP LETTER

Our Case Number: ABP-317679-23

Your Reference: Amphitheatre Ireland Limited



John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61



Date: 07 March 2024

Re: Ringsend to City Centre Core Bus Corridor Scheme.
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned case.

The Board has considered the case and hereby notifies you that it has decided to determine the application without an oral hearing. In this regard, please be advised that the Board has absolute discretion to hold an oral hearing and has concluded that this case can be dealt with adequately through written procedure. Accordingly, the Board hereby considers it appropriate to invite you to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 29th November 2023 received from the National Transport Authority.

A copy of the submission can be found on the Board's website at <https://www.pleanala.ie/en-ie/case/317679> under the heading 'Submissions'. This submission together with the application documentation is also available for public inspection at the following locations:

1. An Bord Pleanála, 64 Marlborough Street, Dublin 1
2. National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Any submission in relation to the above must be received by the Board within 5 weeks from the date of this letter, no later than 5:30p.m. on 11th April 2024.

You may make your submission via email to laps@pleanala.ie, or by hand or post to the offices of the Board. No additional fee is required for making a submission. Please do not use the Board's online submission portal to make a submission, as the submission portal is for submissions that require a fee.

As there are a number of Busconnects applications with the Board for approval, you are requested to provide the following in your submission, should you choose to make one:

- (a) The case reference number: ABP-317679-23
- (b) Your name and address,

Tel	Tel	(01) 858 8100
Glaó Aitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithrean Greasain	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sraid Maoilbhúide	64 Marlborough Street
Baile Atha Cliath 1	Dublin 1
D01 V902	D01 V902

(c) The name and address of the person you are acting on behalf of (if applicable).

If you have any queries in relation to the matter, please contact the undersigned officer of the Board. Please quote the above-mentioned case reference number in any correspondence or telephone contact with An Bord Pleanála.

Yours faithfully,



Lauren Griffin
Executive Officer
Direct Line: 01-8737244

AA01

Teil
Gíao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

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LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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64 Marlborough Street
Dublin 1
D01 V902

APPENDIX 2: NTA RESPONSE

2.2 Section 1b: Northern Liffey Quays - East

2.2.1 Description of Proposed Scheme at this Location

As set out in Section 4.5.1 of Chapter 4 in Volume 2 of the EIAR, this section of the Proposed Scheme will commence at the Samuel Beckett Bridge and will proceed eastwards along the north quays and will conclude at the Tom Clarke East Link Bridge.

The historic Scherzer Bridges at the Royal Canal will be relocated to either side of the carriageway to facilitate the addition of bus lanes. Full bus priority is proposed in both directions along the entire length of the north quays. A two-way cycle track will be provided along the southern side of the road throughout the entirety of Section 1b.

Right-turn advance bus lane signals will operate in the eastbound direction at the junction of Park Lane on R801 North Wall Quay.

Temporary land acquisition is required for a Construction Compound at the Scherzer Bridges to facilitate works. These lands will be reinstated in line with existing conditions and / or urban realm improvements (as applicable) following the completion of works.

Extracts from the General Arrangement Drawings, which are provided in Volume 3 of the EIAR, are included below in Figure 2-2-1 to 2-2-3.

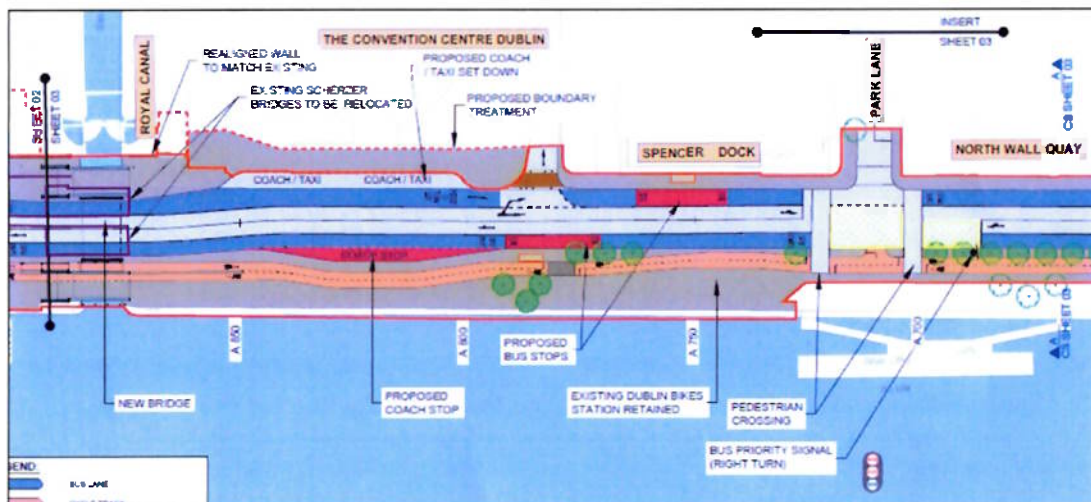


Figure 2-2-1a: Extract from General Arrangement Drawing Sheet 3 Part 1 North

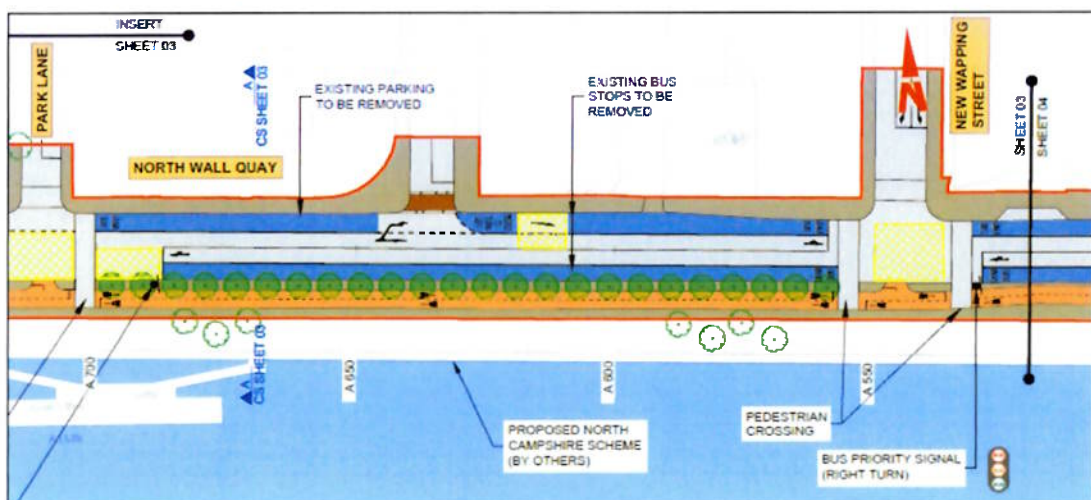


Figure 2-2-1b: Extract from General Arrangement Drawing Sheet 3 Part 2 North

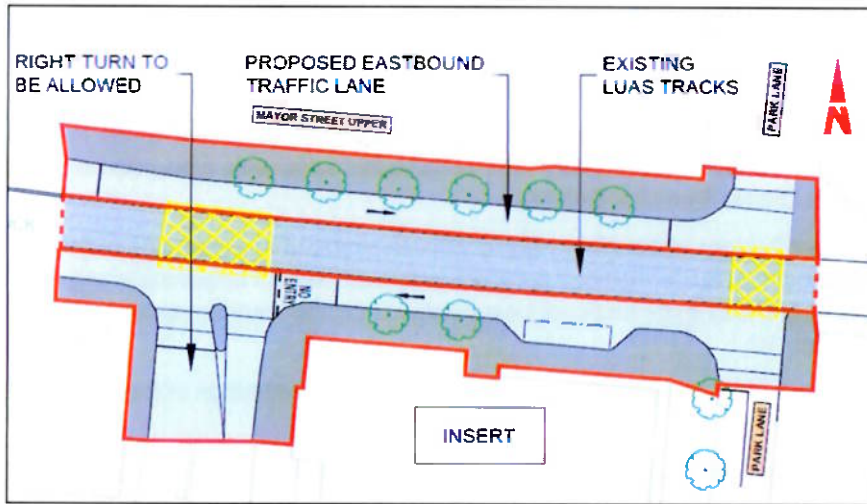


Figure 2-2-1c: Extract from General Arrangement Drawing Sheet 3 Part 3 North

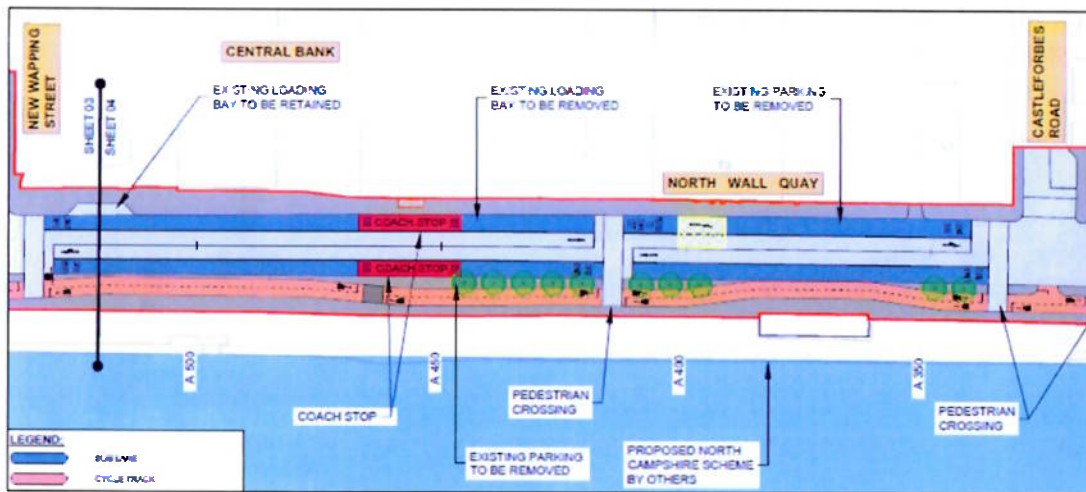


Figure 2-2-2a: Extract from General Arrangement Drawing Sheet 4 Part 1 North

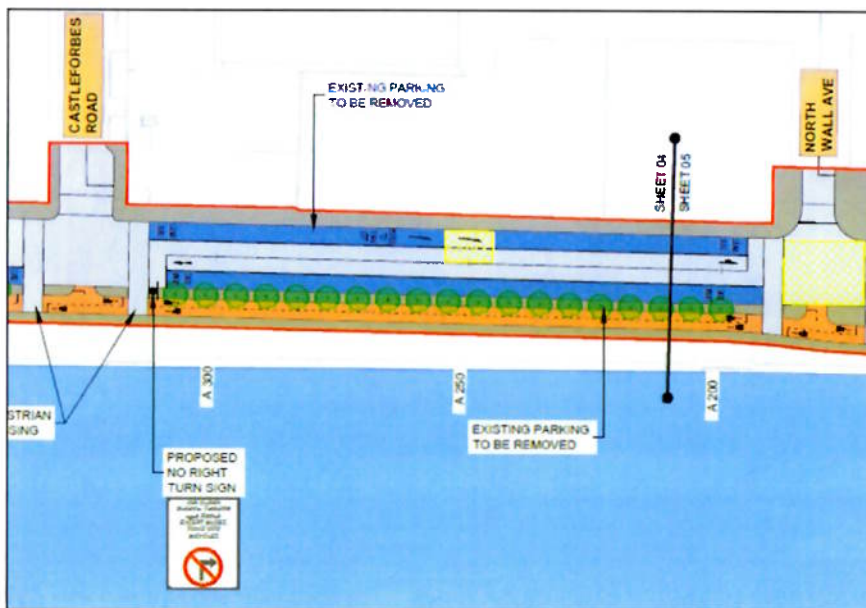


Figure 2-2-2b: Extract from General Arrangement Drawing Sheet 4 Part 2 North

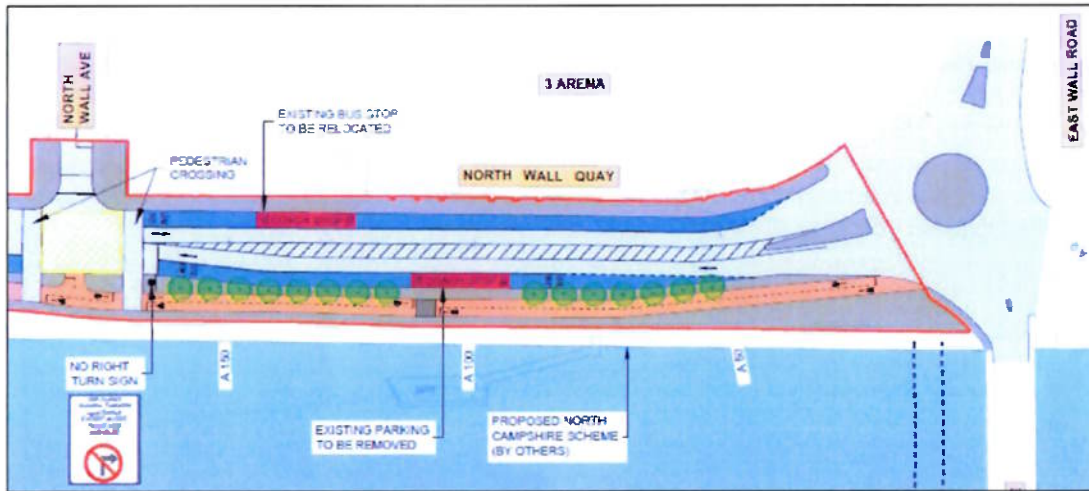


Figure 2-2-3: Extract from General Arrangement Drawing Sheet 5 North

2.2.2 Overview of Submissions Received

Table 2.1 below lists the individual submissions made in respect of the Proposed Scheme in Section 1b Northern Liffey Quays - East.

Table 2.2: Submissions Made in Respect of Section 1b: Northern Liffey Quays - East

No	Name	No	Name	No	Name
1	Amphitheatre Ireland Limited (3-Arena)	10	Dublin Cycling Campaign	22	Transport Infrastructure Ireland
6	Councillor Claire Byrne	21	Spencer Dock Management Ltd.	23	Waterside Block 9 Developments Ltd.

2.2.3 Issues Raised for Section 1b

2.2.3.1 Concerns in relation to access to the 3-Arena

Summary of issue raised:

The following key issues were raised in the submission by John Spain & Associates and Waterman Moylan on behalf of Amphitheatre Ireland Ltd. (3-Arena):

1. Access to 3-Arena small service yard at SW corner of property.
2. Maintenance of access to 3-Arena and its service yards during construction, including from North Wall Avenue.
3. Request for the CBC Contractor to consult with 3-Arena about events and access.
4. Request that Works should cease by 9pm so as not to impede people leaving events. Large numbers of pedestrians for events.
5. HGV Restricted Zone – clarify that Sherriff Street Upper and North Wall Avenue are designated HGV routes. Access for deliveries and waste collection not to be disrupted.
6. Right-turn to be retained into North Wall Avenue for deliveries.
7. Relocate bus stops away from access to 3-Arena service yard on NWQ.

Response to issue raised:

The proposed restriction of several right-turns from North Wall Quay in the westbound direction is described in EIAR Volume 2, Chapter 4 Description of the Proposed Scheme, Section 4.5.1.6 and Table 4.4. This table describes alternative access routes to the areas affected from north via Sherriff Street, as is illustrated on the map in Figure 2-2-4. These turn restrictions are necessary to prevent obstruction of the westbound bus lane so as to fully achieve the public transport objectives of the Proposed Scheme as described in EIAR Volume 2, Chapter 6 Traffic and Transport.

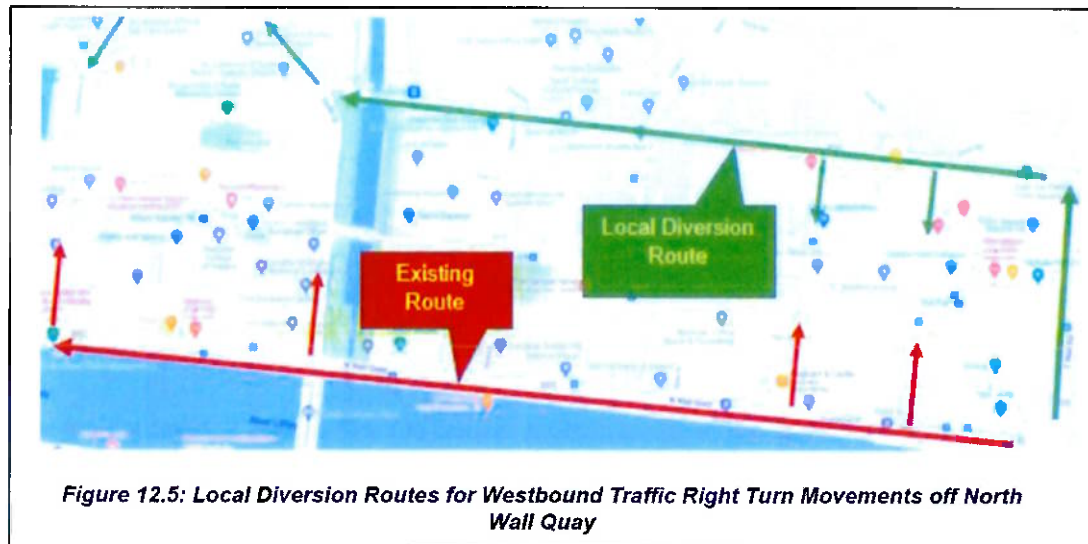


Figure 2-2-4: Local Access Revision to the Docklands Area (from Preliminary Design Report Chapter 12)

Responses to the specific issues raised in the submission by John Spain & Associates and Waterman Moylan on behalf of Amphitheatre Ireland Ltd. (3-Arena) are as follows:

1. The Contractor will be required to liaise with affected businesses, including the 3-Arena throughout construction as set out in EIAR Volume 2 Chapter 5 Construction Section 5.9. Access to the service yards from North Wall Quay and from North Wall Avenue will be maintained throughout construction.
2. The working hours for the proposed development are set out in Section 5.10.3 of the EIAR and are between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays. However, the Contractor will be required to take account of the activities of local businesses and will be responsible for pedestrian safety through the site. Working areas of the site will be cordoned off by hoarding for the safety of pedestrians and operatives.
3. Section 5.8.4.1.1 in Chapter 5 (Construction) in Volume 2 of the EIAR sets out the traffic management measures for general and HGV traffic wanting to access the north quays during the construction phase of the Proposed Scheme.
4. Right turns for general traffic from North Wall Quay are generally being removed as part of the scheme (see Preferred Route Option Report for further details). Access to the 3-Arena Loading Bay on North Wall Avenue will be available via East Wall Road and Sheriff Street Upper as shown in Figure 2-2-5, which is a more detailed blowup from the wider area map in Figure 2-2-4 earlier. It should be note that there is a restriction on heavy goods vehicle traffic in much of the city area to the west and southeast of the 3-Arena, and therefore delivery vehicles will approach from the northeast via East Wall Road, in which case the route via Sherriff Street Upper is shorter than via North Wall Quay. In this regard the Proposed Scheme will have no impact for deliveries to the 3-Arena.
5. The proposed coach stop does not obstruct the access to the 3-Arena Service Yard as shown in Figure 2-2-6.

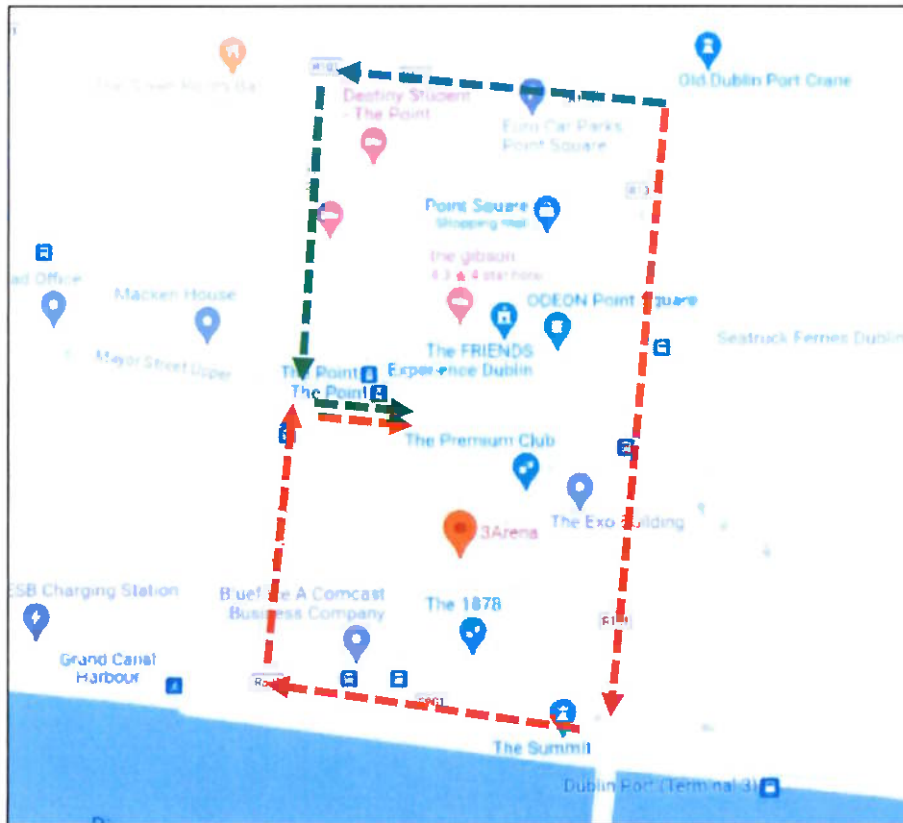


Figure 2-2-5: Access Route for Deliveries to 3-Arena
(Route via North Wall Quay along red arrows / More direct route along green arrows)

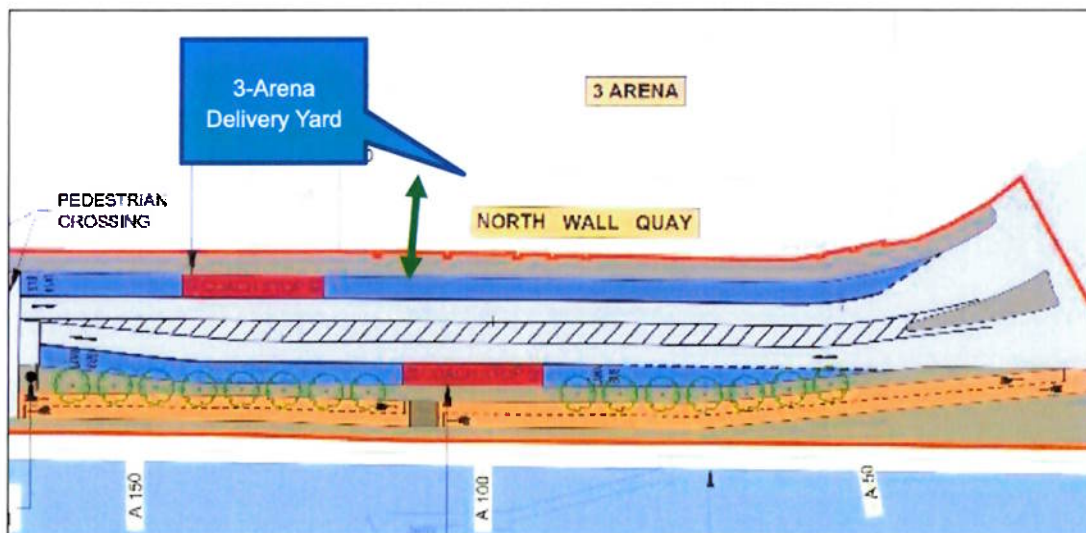


Figure 2-2-6: Proposed Scheme at 3-Arena Delivery Yard with access shown as a green arrow.
(Extract from General Arrangement Drawing Sheet 5 in EIAR Volume 2, Figures, Chapter 4 Proposed Scheme Description, Part 2),

APPENDIX 3: WATERMAN MOYLAN TECHNICAL NOTE

Project:	3 Arena	Job No:	14-024n.011
Subject:	Ringsend to City Centre Bus Corridor	Revision:	0
Prepared by:	B. McCann	Date:	10/04/2024
Checked by:	J Gibbons	Date:	10/04/2024
Approved by:		Date:	

Background

On 7th March 2024, An Bord Pleanála (ABP) advised that the planning application for the Ringsend Core Bus Corridor Scheme would be determined without an Oral Hearing.

On the same day, ABP issued the NTA *Response to Submissions* received and advised that any further submissions should be lodged before 11th April 2024.

Submission by 3Arena

The submission prepared by Waterman Moylan on behalf of 3Arena in September 2023 and the NTA response dated November 2023 are summarised in Table 1. See also Figures 1, 2 and 3.

The number of issues which have not been addressed by the NTA is significant.

Table 2 – Summary of Submission and NTA Response.

Submission	NTA Response
Planning Conditions	Issue not addressed in response
Scheduling of Works	Issue not addressed in response
Working Hours	Working hours after 9pm at discretion of contractor.
Deliveries and Waste Collection	Deliveries via Sherriff Street
Production Deliveries	Deliveries via Sherriff Street
Audience Movements	Issue not addressed in response
Right Turn to North Wall Ave	Request not agreed to in response.
HGV Zone	Deliveries via Sherriff Street
Relocation of Bus Stops	Request not agreed to in response.
Alternative Access	Issue not addressed in response

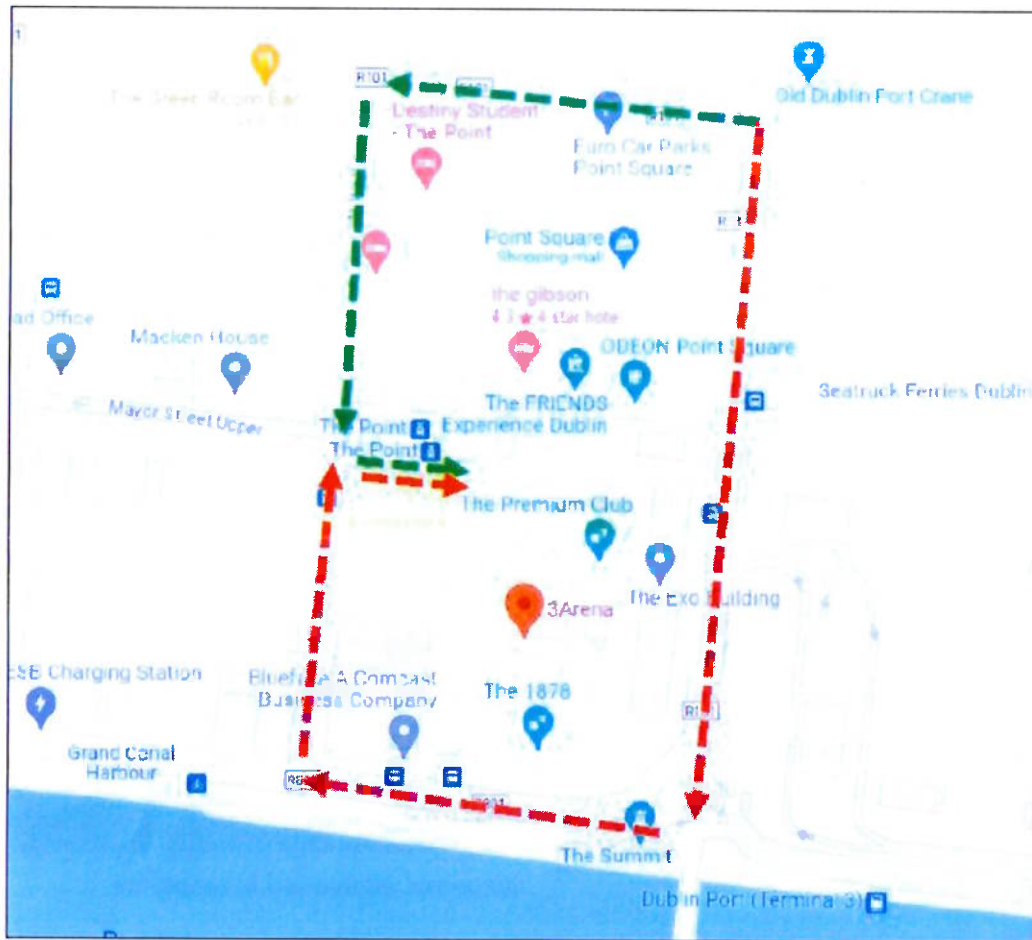


Figure 1 – Access Routes for Deliveries proposed by NTA

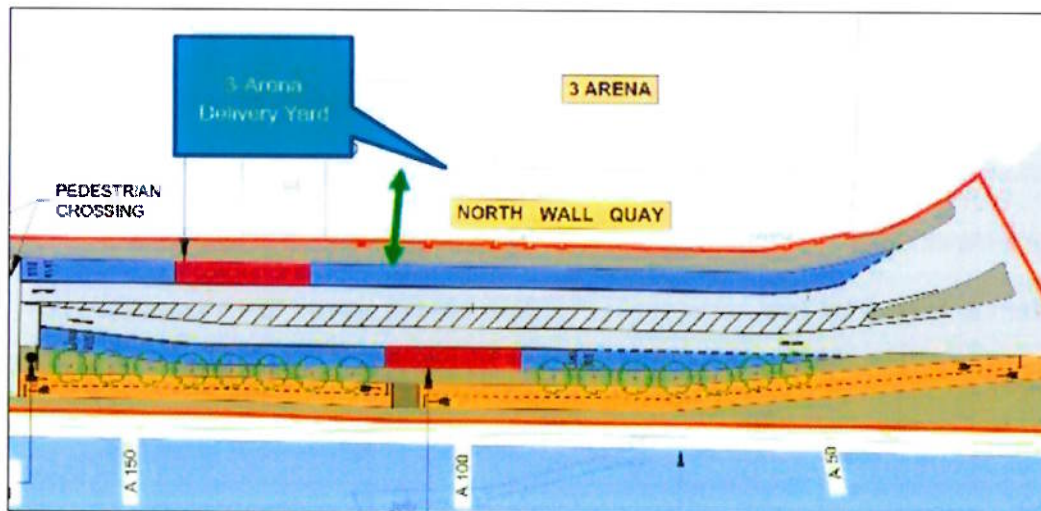


Figure 2 – Access Route Proposed by NTA to Service Yard on North Wall Quay

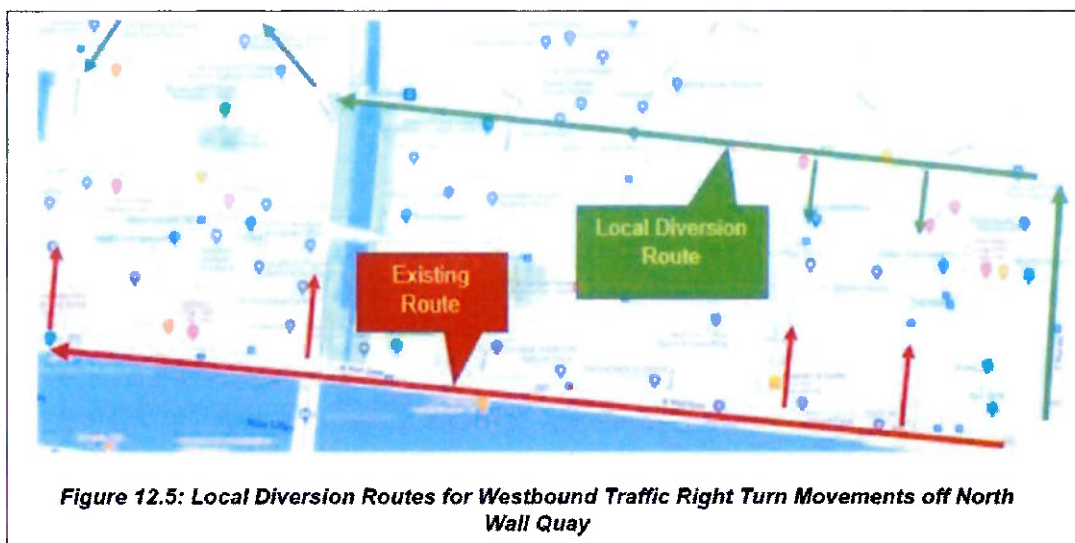


Figure 3 – Local Diversion Routes

Review of NTA Response

The confirmation from the NTA that ‘Access to service yards from North Wall Quay and from North Wall Avenue will be maintained throughout construction’ is welcome.

However, a similar confirmation has not been received in relation to audience access during construction.

This Note is a further submission on behalf of 3Arena addressing the following issues which inter alia have not been adequately addressed by the NTA.

Further Submission

The 3Arena and their advisers have reviewed the *NTA Response to Submissions* and are concerned that a number of issues raised in the Waterman Moylan submission of September 2023 have not been addressed by the NTA in their *Response to Submissions*.

We therefore make the following additional submissions on behalf of 3Arena

(a) Disruption of Audience Movements

NTA responses 1 and 2 reproduced below do not address the potential disruption to events at the 3Arena which could arise during the construction stage of the proposed bus corridor.

It could well be that the NTA do not appreciate either the size or frequency of events at the 3Arena and the need to maintain clear and safe access for crowds of up to 14,000 persons both arriving to and departing from the venue.

This is particularly so as there is no car parking at the 3Arena and all patrons must access the venue on foot or by public transport. The modes of travel are fully described in the previous submission of September 2023.

1. The Contractor will be required to liaise with affected businesses, including the 3-Arena throughout construction as set out in EIAR Volume 2 Chapter 5 Construction Section 5.9. Access to the service yards from North Wall Quay and from North Wall Avenue will be maintained throughout construction.
2. The working hours for the proposed development are set out in Section 5.10.3 of the EIAR and are between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays. However, the Contractor will be required to take account of the activities of local businesses and will be responsible for pedestrian safety through the site. Working areas of the site will be cordoned off by hoarding for the safety of pedestrians and operatives.

Nor does the responses by the NTA address the ongoing concern during the construction period of safe passage for the large numbers of people arriving on foot for an event at the 3Arena and departing afterwards.

The late evening working hours which are proposed for this contract are of particular concern especially those between 9pm and 11 pm which may be worked by the Contractor at his own discretion.

Should this project receive planning approval, An Bord Pleanala is requested to include a specific condition or conditions that the Contractor must have regard to and accommodate all movements, both vehicular and pedestrian, generated by events at the 3Arena throughout the construction period including the safety of audience arrival to and departure after an event and that the operators of the 3Arena are contacted on these measures.

(b) Alternative Access

The NTA Response does not address the provision of a suitable alternative access should the normal access route for deliveries and audiences be impassable as a result of construction works for the proposed corridor.

Should this project receive planning approval, An Bord Pleanala is requested to include a specific condition or conditions that the Contractor must at all times provide a suitable and safe access for audiences to the 3Arena in the event the normal access is impassable due to construction works and that the operators of the 3Arena are contacted on these measures.

(c) Previous Submission

Notwithstanding the limited response by the NTA to the previous submission from the 3Arena in September 2023, An Bord Pleanala is requested to take on board all of the issues raised in that submission.

In the event that planning permission is granted for this project, An Bord Pleanala is requested to include in the approval, appropriate conditions addressing all of the concerns and issues raised by the 3Arena.

Brian McCann

10th April 2024