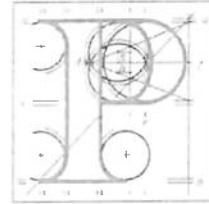


Our Case Number: ABP-317679-23

Your Reference: CHQ Dublin 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

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Glaó Áitiúil
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Láithreán Gréasáin
Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

By email: laps@pleanala.ie

AN BORD PLEANÁLA

LDG- _____
ABP- _____

11 APR 2024

Fee: € _____ Type: _____
Time: 16.02 By: hand

Date: 11th April 2024
JSA Ref: 21024

Dear Sir / Madam,

RE: SUBMISSION TO AN BORD PLEANÁLA IN RESPONSE TO THE NTA SUBMISSION IN RESPECT OF THE PROPOSED BUS CONNECTS RINGSEND TO CITY CENTRE CORE BUS CORRIDOR APPLICATION IN RELATION TO LANDS AT CUSTOM HOUSE QUAY, DUBLIN 1.

ABP REF: 317679-23

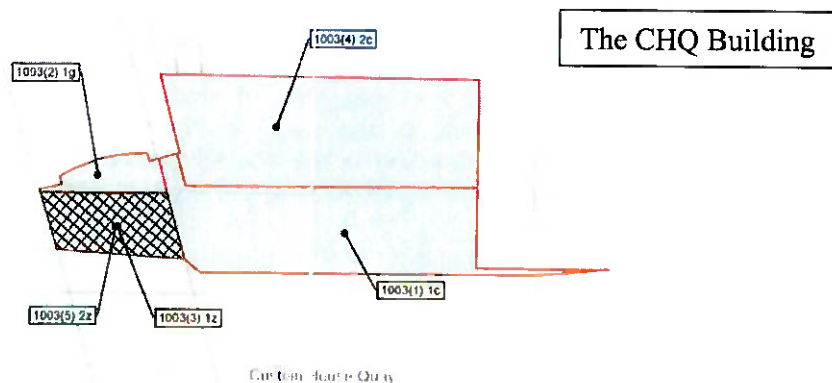
1. Introduction

- 1.1 On behalf of our client, CHQ Dublin Limited, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01 YY59, we wish to make a response to the An Bord Pleanála letter dated 7th March 2024 (Appendix 1) inviting a submission under Section 217B of the Planning & Development Act 2000, as amended, to the National Transport Authority's submission dated 29th November 2023 on the Ringsend to City Centre Core Bus Corridor Scheme Application currently registered and pending a decision with An Bord Pleanála under ABP Ref: 317679-23.
- 1.2 Our client has reviewed the NTA response dated 29th November 2023 in respect of their lands and interests at the CHQ Building, Custom House Quay and welcomes the opportunity to reply to the content. These have been referred to under Section 1a: Northern Liffey Quays – West of the NTA response.
- 1.3 In summary, CHQ Dublin Limited reiterate their serious concerns (as previously set out) regarding the nature of the proposed Temporary Construction Compound R1 located on the northern side of North Wall Quay immediately adjacent to the southwest corner of the CHQ building. The compound will result in a highly compromised situation for the operations of the CHQ building and accessibility to the main entrance to the building at the western elevation.
- 1.4 While the revised plan of the Construction Compound R1 (Image 5.2: Location and Extent of Construction Compound R1 After Relocation of Scherzer Bridges) set out by the NTA in their submission of 29th November 2023 is noted, this continues to

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

result in an unacceptable situation for the accessibility of the CHQ building and the businesses operating from the location following the in A 5m strip between the parking and welfare elements of the compound and the fire escape stairs at the western elevation of the CHQ building is simply inadequate to accommodate the high number of pedestrians, cyclists (as well as limited vehicular movement) to the main entrance to this historic protected structure which is occupied by companies and visitor attractions of national importance. This situation will endure for a minimum of 30 months and may be reasonably anticipated to stretch beyond this, bringing sustained disruption for employers, staff and visitors over a period of almost 3 years which is guaranteed to damage trade and visitor numbers to this important city centre tourist destination.

- 1.5 In addition to this, planning permission Reg. Reg.: 3251/23 comprising a food hall, exhibition and event space, in addition to office space in an extended service building at the eastern elevation of the CHQ building has been granted, with work anticipated to begin later this year. This food market at ground floor level will intensify the use and activity at the CHQ building in the short term and requires clear and unrestricted access to the main entrance to the building at its western elevation. The proposed Bus Connects construction compound arrangement severely restricts this and will undoubtedly become a barrier to the successful launch of the food hall and exhibition space.
- 1.6 The proposed arrangement is therefore not acceptable to our client and the businesses located within the CHQ building. Our client respectfully submits that the public space south of North Wall Quay should be utilised to accommodate the entirety of the construction compound throughout the phase of works and be maximised by the NTA to mitigate disruption and protect the interests of the current and future operation of the CHQ building and its tenants. This should include the site office, welfare and parking being relocated south of the road and adjacent to the storage area and plant set out in the Revised Image 5.2 from the EIAR, as discussed further below.
- 1.7 In this respect, our client objects to the use of Plot 1003(4) (under CHQ Dublin Limited ownership) for the location of part of Construction Compound R1. The entirety of the compound should be located south of North Wall Quay which can easily accommodate this while mitigating potential impacts on the accessibility of the CHQ building and protecting the businesses operating within.
- 1.8 The subject plots at Custom House Quay are shown in the extract below.



2. Site Location & Context

2.1 The subject location is immediately north of Custom House Quay and to the southwest of the CHQ Building. The combined area of the relevant plots which have been proposed by the NTA for use are outlined in red on the image below.



Figure 1: Approximate location of lands to be Compulsorily Acquired (Google Maps)

2.2 The relevant extract from the BusConnects 'General Arrangement' drawing no. BCIDD-ROT-GEO_GA-0016_XX_00-DR-CR-0001 is included below, with the approximate location of the relevant lands outlined in yellow.

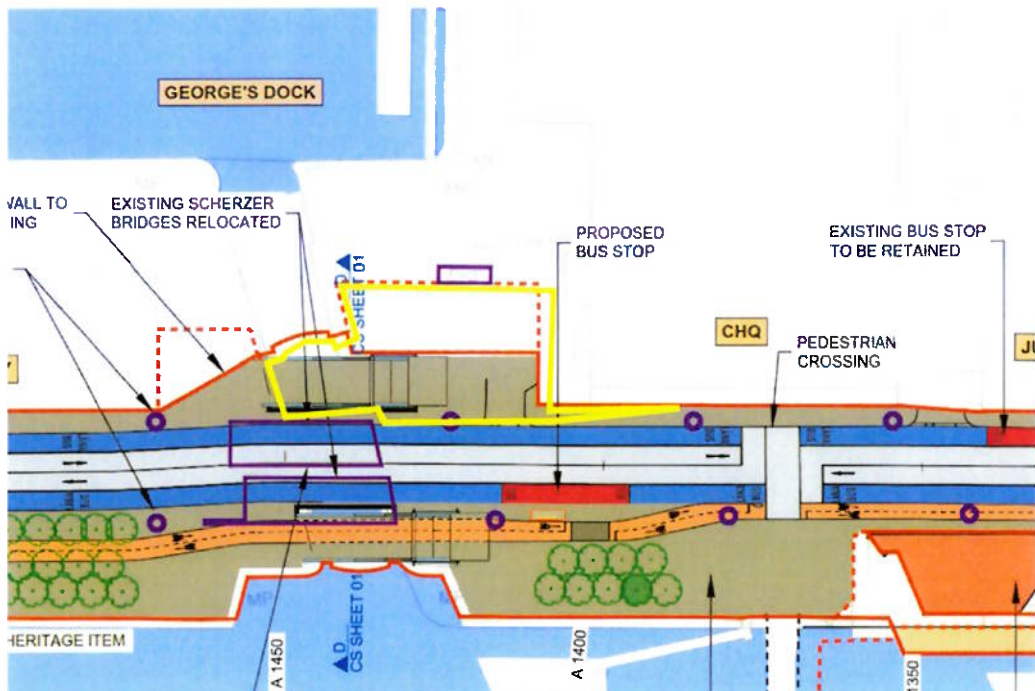


Figure 2: Approximate location of lands to be Compulsorily Acquired (NTA)

2.3 The intended use of the area during the construction stage of the proposed BusConnects route is shown below, extracted from Image 5.1 of the EIAR submitted with ABP Ref: 317679-23.

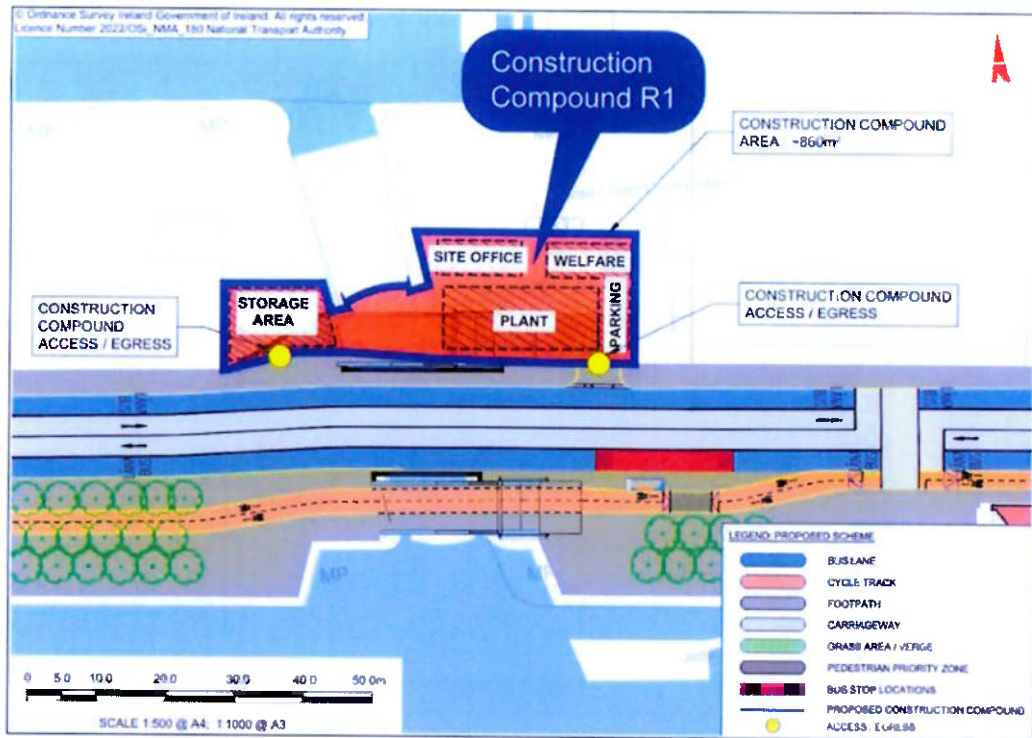


Figure 3: Location & Extent of Construction Compound R1 (Image 5.1 of EIAR Volume 2 Main Report)

2.4 The NTA submission clarifies the position in respect of the extent of the Construction Compound R1 following the relocation of the Scherzer Bridges, shown below.

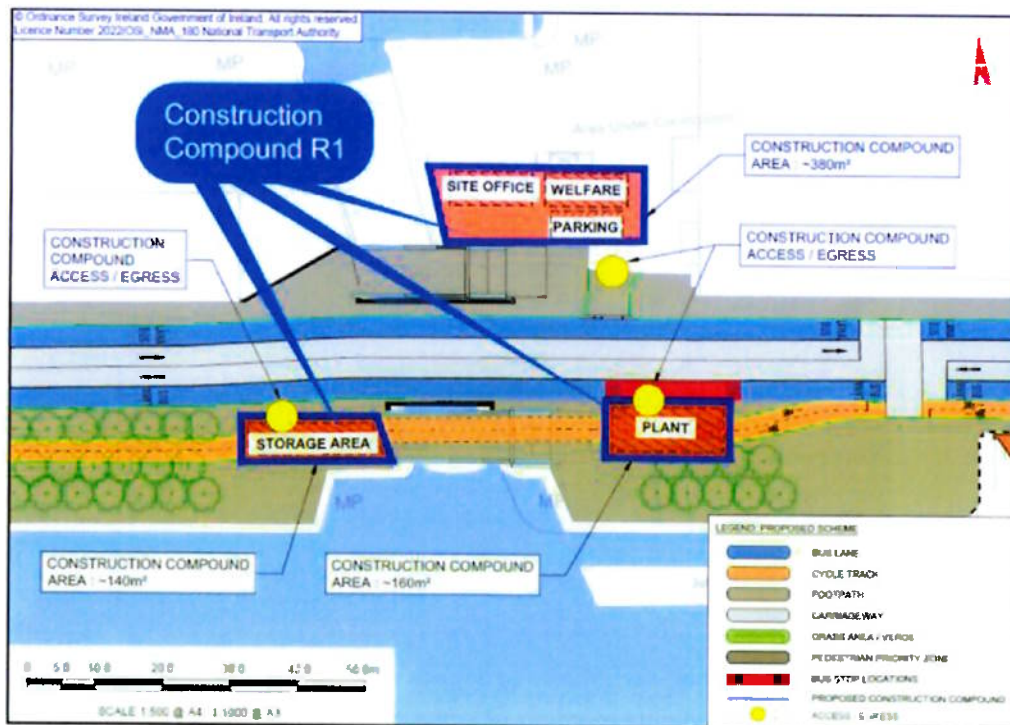


Figure 4: Revised Image 5.2 of EIAR Chapter 5 (NTA Response)

3. Commentary on NTA Submission to BusConnects Application

Scale & Location of Construction Compound R1

- 3.1 While our client does not object to the principle of the Bus Connects route along North Wall Quay, CHQ Dublin Limited objects to the extent and location of Construction Compound R1 having regard to its location immediately adjacent to the CHQ building and the inadequacy of the 5m strip between the fire escape stairs and the compound itself at the western perimeter of the building. This is shown in Figure 2-1-6 of the NTA Response, included below:

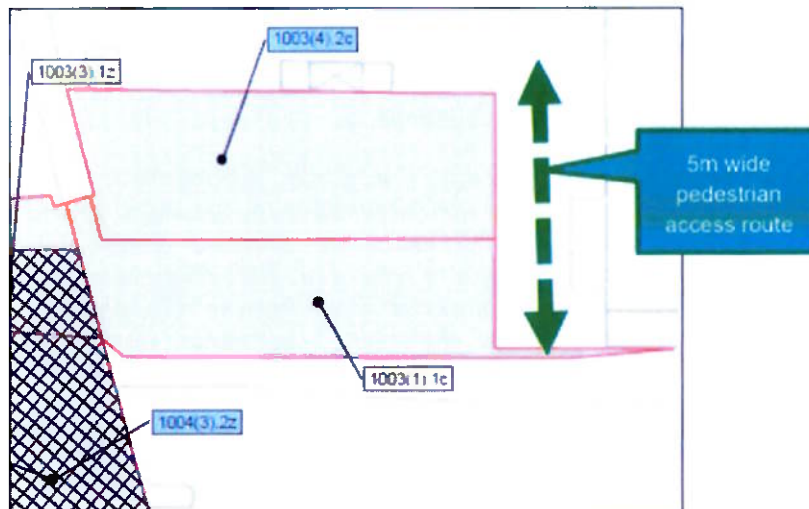


Figure 2-1-6: CPO Plots at CHQ

- 3.2 The NTA appear to overlook the potential impact on not only pedestrian but cycle access through the area at George's Dock, as well as the limited vehicle movement which utilises the plaza west of the CHQ building for set downs and servicing. The plaza also provides vehicular access to Stack B which is owned by Trinity College. The proposed compound layout will significantly reduce the available space to access the main entrance at the western elevation as well as the route through George's Dock from Custom House Quay to the Luas stop / Connolly Station / Busáras beyond to the north.
- 3.3 Table 5.4 of the submitted EIAR notes construction activity spanning a period of 2 years for the works involved in the Scherzer Bridge Replacement Programme. This is likely to an absolute minimum timescale, with the impact on the access to the CHQ building and through route from Custom House Quay to George's Dock and beyond to the north likely to endure substantially longer before returning to normal levels of movement as observed today.
- 3.4 There is nothing to prevent the relocation of the entirety of the construction compound south of the road for the duration of the construction phase. This will ensure the compound would be at a location of reduced sensitivity in comparison to the proposed location immediately adjacent to the CHQ building where it will significantly reduce the available space to access the main entrance at the western elevation as well as the route through George's Dock from Custom House Quay to the Luas stop / Connolly Station / Busáras beyond to the north which serves thousands of visitors and employees daily.

- 3.5 The severe impact on this route and access point will also restrict customers from reaching the main entrance of the CHQ Building at the southwest corner of the building and obstruct the public plaza adjacent. This will have obvious and significant impacts upon the level of custom and footfall to the businesses operating within the CHQ building and inevitably deter people from utilising this route entirely. Imposing this restriction on a long-established and important route for a period of close to 3 years is not acceptable to our client who objects to the location and scale of the construction compound immediately adjacent to the southwest elevation of the building and its main entrance at this location.
- 3.6 We refer to the accompanying CORA Consulting Engineers letter (Appendix 2) which highlights the restrictions to the access of building for all users as a result of the proposed compound in its current design.

CHQ Building Context & Visitor Numbers

- 3.7 The presence of the CHQ Building has grown exponentially in the last decade, welcoming a wide range of retail and food and drink operators, restaurants and bars and recreation, as well as the high-tech, start-up hub at Dogpatch Labs which has added positively to the vibrancy and vitality of CHQ. Dogpatch Labs won a £17m contract in 2020 to manage the National Digital Research Centre (NDRC) until 2025, supported by regional partners, indicating the strength and significance of the company's presence at CHQ.
- 3.8 The CHQ Building has increased occupancy from 20% in 2013 when the building was purchased from the Dublin Docklands Development Authority to being 80% let in 2019 with employment numbers increasing from 30 to 650 in the same time period.
- 3.9 In terms of visitor numbers and pedestrian movements at CHQ, our client notes that in excess of 2.5 million people use and pass through the CHQ Building annually, equating to c. 4,000 to 8,000 people daily. Many million more use the corridor between George's Dock and CHQ to and from Custom House Quay and Mayor Street and/or the Luas stop at George's Dock, Connolly Station or Busarus or Amiens Street.
- 3.10 CHQ Building itself attracts an additional 1.5m people a year coming in for meetings in the space, in Dogpatch Labs or for coffee or lunch or a snack, many from the local area – at least 40% of them use the entrance that is going to be massively compromised.
- 3.11 The permitted food market Reg. Ref.: 3251/23 is expected to commence development later in 2024 and will anticipate 500,000 visitors per year in its first two years of operation, with over one million visitors anticipated per year thereafter. The immediate success of this important facility and visitor destination in the city centre will undoubtedly be compromised by the presence of the compound and its associated noise, dust, vibration and visual appearance will deter trade and reduce footfall.
- 3.12 EPIC Irish Emigration Museum welcomed 241,000 visitors in 2019, with a target of 750,000 annually, with the Jeanie Johnston Irish Famine Ship moored at CHQ received 36,000 visitors in 2019 with a target of 100,000 per annum. This indicates the existing strength of trade and interest at CHQ and the aspiration to enhance this further in future years assisted by appropriate improvements to the surrounding area in respect of public realm, streetscape and welcoming public spaces which can increase footfall and support local businesses. The proposed position of the construction compound will have a detrimental impact on access to the CHQ Building

and in particular, the EPIC Emigration Museum which welcomes c. 500,000 visitors per year.

- 3.13 The Irish Emigration EPIC Museum will be building and launching an expanded event, exhibition and gala dinner space over 1,400 square metres in 2025 in partnership with Failte Ireland. The location and extent of the proposed Construction Compound R1 in close proximity to the southwest corner of the CHQ Building will have an adverse effect on the potential visitor numbers and footfall to the building and its associated tenants.
- 3.14 The CHQ Building unique space has seen several high profile cultural and corporate events hosted at the venue, contributing to cultural life and night-time economy.
- 3.15 A list of major tenants who have the potential to be adversely affected by the location of the construction compound immediately adjacent to the southwest elevation of the building are listed as follows:
- EPIC The Irish Emigration Museum
 - EPIC Museum gift shop
 - EPIC Events
 - Irish Family History centre
 - Flyefit Gym
 - Urban Brewing
 - Dogpatch Labs (Ireland's largest and premier startup hub)
 - The NDRC (Government accelerator)
 - HBAN – Halo Business Angel Network
 - Starbucks Coffee
 - Mitchell & Sons
 - Upshoots
 - Seven Wonders
 - Bakehouse
 - Toss'd Noodles
- 3.16 We refer to the accompanying CHQ Dublin letter which details this further, enclosed at Appendix 3.
- 3.17 In addition, events business EPIC Events manages 150 important events a year utilising existing western entrance for guests and for loading. This will become very difficult or indeed impossible under the current plans. This will significantly impact on these businesses on a day-to-day basis.
- 3.18 This route through the inviting and attractive public plaza immediately north of Custom House Quay will be significantly reduced to a gap of c. 5 metres between the external stairwell at the southwest corner of the CHQ Building and the perimeter of the proposed construction compound. This is not an acceptable arrangement for our client and the businesses currently operating from the CHQ Building for a minimum period of 2 years. This will have an inevitable and potentially significant impact on the trade and revenues of existing businesses as well as impacting upon the attractiveness of the CHQ Building as a tourist and visitor destination in Dublin city centre.

Dublin City Development Plan 2022-2028

- 3.19 The proposed extent of the construction compound conflicts with the policies and objectives of the Dublin City Development Plan 2022-2028 which recognises the

valuable contribution of the CHQ Building to the cultural amenity of the city and specifically the Dublin Docklands. Chapter 12 of the Development Plan states that:

“The opening of EPIC, a new museum for the city within the historic CHQ building has been a welcome addition to the area.”

- 3.20 The Plan also notes that *“other new additions are planned and it is expected these will be delivered during the lifetime of the Plan”*, one addition is our client’s proposed food market and gala dinner / event space at the CHQ Building recently permitted under DCC Reg. Ref.: 3251/23 and expected to commence development in 2024.
- 3.21 CHQ Dublin Limited are currently working actively with Failte Ireland, Dublin City Council and partners to revitalise the Docklands and George’s Dock area having regard to the out-door economy and nighttime economy. The proposed compound layout and design is a direct threat to these objectives which are supported by the CDP, as noted below:

It is the Policy of Dublin City Council:

CU11	<p>Cultural Facilities within Docklands</p> <p>Support and encourage the growth of cultural facilities within Docklands to include the Poolbeg Peninsula, at community and citywide scale, to enrich the area, generate activity and economic benefits and celebrate the maritime heritage of the Docklands area.</p>
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- 3.22 The construction compound as part of the BusConnects scheme has the potential to impact negatively on generating activity and the economic benefit of the CHQ Buildings and its existing businesses. This is likely to restrain the growth of cultural facilities at CHQ in the Docklands area due to impeded public access and footfall.
- 3.23 In addition to this, Policy CU013 is also relevant:

CU13	<p>Protection of Cultural Uses</p> <p>To protect cultural uses within the city that have been negatively impacted by the Covid pandemic and seek to preserve such spaces so they are not lost to the city as a result of the economic impact of the extended closure during the pandemic.</p>
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- 3.24 The CHQ Building including the EPIC Museum and associated uses were negatively impacted by the covid pandemic due to restrictions on public movement, travel and quantum of visitors permitted within a venue. The impacts are still being felt by the tourist industry which is slowly returning to levels observed in 2019. In this respect, the addition of a construction compound immediately adjacent to the southwest corner of the CHQ Building and its main entrance will only serve to prevent trade and limit footfall to the building, at a time when the facilities and offer of the building is expanding.
- 3.25 On this basis, the design of the proposed application ABP Ref: 317679-23 requires to be amended to relocate the construction compound south of North Wall Quay and away from the main entrance of the CHQ building.

4. Conclusions

- 4.1 On behalf of our client, CHQ Dublin Limited, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01 YY59, we wish to make a response to the An Bord Pleanála letter dated 7th March 2024 inviting a submission under Section 217B of the Planning & Development Act 2000, as amended, to the National Transport Authority's submission dated 29th November 2023 on the Ringsend to City Centre Core Bus Corridor Scheme Application currently registered and pending a decision with An Bord Pleanála under ABP Ref: 317679-23.
- 4.2 Our client has reviewed the NTA response dated 29th November 2023 in respect of their lands and interests at the CHQ Building, Custom House Quay and reiterate their objection to the location and scale of the proposed Construction Compound R1 located immediately adjacent to the southwest corner of the CHQ building.
- 4.3 As discussed above, there is no reason as why the compound cannot be relocated south of North Wall Quay to facilitate the works to the Scherzer Bridge and the BusConnects infrastructure along the roadway for the duration of the works. We note that timescale is proposed at c. 30 months, which is considered to be a conservative estimate having regard to the nature of the proposals and the heritage sensitivities of the area.
- 4.4 The nature and extent of the construction compound being location adjacent to the CHQ building for a minimum period of 30 months will have an unacceptable negative impact upon the trading environment at the CHQ Building, reducing a wide public plaza to a corridor of c. 5 metres and severely restricting the movement of pedestrians and cyclists along the western perimeter of the building and consequently having an inevitable detrimental effect on visitor numbers and footfall to the CHQ Building.
- 4.5 The proposed arrangement at this location as set out in the BusConnects General Arrangements drawings and the associated CPO plans is not acceptable to our client and it is respectfully submitted that the proposed approach be reconsidered to enable the continued free flow of the public around the CHQ Building to ensure potential impacts on businesses operating within are mitigated to the greatest extent possible. The proposed compound can be relocated south of North Wall Quay on lands under ownership of Dublin City Council and where there is a much lower propensity for disruption to established business and visitor destinations at the CHW building.
- 4.6 Our client respectfully requests that An Bord Pleanála takes the above submission into account in assessing the BusConnects Ringsend to City Centre Core Bus Corridor Scheme application Ref: 317679-23.

Yours faithfully,



John Spain
Managing Director John Spain Associates Ltd.

APPENDIX 1: ABP LETTER

Our Case Number: ABP-317679-23
Your Reference: CHQ Dublin Limited



An
Bord
Pleanála

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
Glaos Aithní	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Greasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sraid Maoilbhríde	64 Marlborough Street
Baile Átha 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

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APPENDIX 2: CORA CONSULTING ENGINEERS LETTER

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Consulting Engineers
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10 Lower Mount Street
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+353 1 6611100
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info@cora.ie



Ian Livingstone
John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

11th April 2024

**Re: CHQ Building & Bus Connects ABP Ref 317679-23 Bus Corridor
Application & CPO of lands**

Ian,

We have reviewed the documentation regarding the ABP Bus Connects Application Ref 317679-23 Bus Corridor in relation to the request to CPO two parcels of lands in front of the CHQ Building on Custom House Quay and we have the following comments.

Bus Connects Proposal

It is proposed to acquire two parcels of lands adjacent to the south west corner of the CHQ Building as part of the Bus Connects development works. One parcel temporarily for a period of approximately two years to facilitate the construction of new road bridges and a further parcel permanently to accommodate the relocation of one of the existing Scherzer bridges.

Commentary

The CHQ Building was originally redeveloped by the DDDA from 1999 to 2002. After a slow start after completion and a change in ownership to the current owners in 2014, occupation and visitor numbers to the CHQ Building began to grow to such an extent that there are now approximately two and a half million visitors that pass through the CHQ Building every year.

During the original works in 2002 (which the writer was the Structural Engineer on), it was envisaged that the entrance at the south west corner of the building adjacent the quays was to be the primary entrance for the building. This is the case with the Epic Museum entrance located adjoining this entrance door. At a later stage, approximately 2009, a revolving door was constructed through the south elevation glazing to encourage people to enter the CHQ building as they crossed the Sean O'Casey Footbridge.

The revolving door can accommodate limited access numbers due to its size and is approached by a series of steps so is not compliant with Part M of the Building Regulations. The main access to the CHQ Building is via the South west doorway.

CPO Proposal

The CPO proposal to acquire two parcels of land that will extent from the public roadway to the south and for approximately 20m to the north will reduce the public plaza in front of the south west doorway to approximately 5m from the entrance canopy.

DIRECTORS

John Casey
MR. CEng. MBE

John Pigott
MR. CEng. FEng. CEng. MBE

John McMenamin
MR. CEng. MBE. Eng. Manager CEng. MBE

ASSOCIATE DIRECTORS

Kevin O'Mahony
MR. CEng. CEng. MBE. MBE

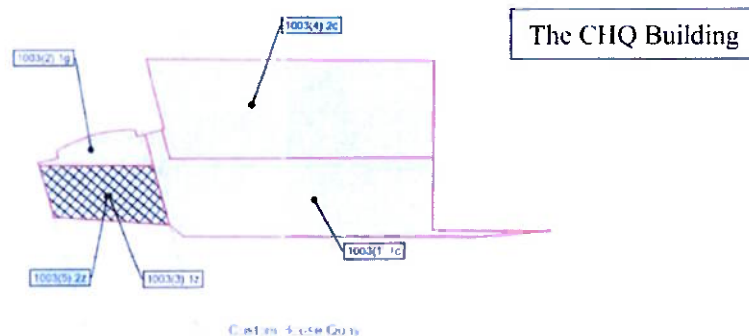
Lisa Edden
MR. CEng. MBE. MBE

REGISTERED ADDRESS

Behan House
10 Lower Mount Street
Dublin, D02 HT71

VAT NO 350789274
CO. REG NO 008357
OF 19 ISSUE N> 02
ISSUE DATE 18/01/18





Extract of CPO Mapping showing lands to be acquired temporarily (to the north) and permanently (to the south and west)

We have a number of issues with this CPO.

- Reduction of the space to the front of the south west main entrance will result in difficulties for early morning deliveries where parking is facilitated for quick drop offs to the CHQ Building.
- This prevent access to the building operated by Trinity College to the west of the CHQ Building and access to their carpark – known as Stack B. It also introduces conflicts between pedestrians and vehicles reduced into a narrower access than what currently exists.
- Locating this Site Compound directly over an original 1820's surface water drainage culvert which discharges rainwater to the River Liffey during low tide. A sections of the crown of this culvert are damaged and missing bricks that we are aware of from a 2015 CCTV survey and so loading should be restricted.
- Lack of visibility of the main entrance of the CHQ Building for an extended period of time during the construction works and with the construction period very likely to extend beyond two years if the construction compound and bridge replacement and relocation to occur as part of one contract.

Commentary

Reduction in space

Reduction in space to the front of the south west main entrance will result in delivery difficulties and displacement of delivery vehicles to other areas. Timings of deliveries to the rear delivery yard of the CHQ Building are carefully controlled so as to ensure smooth and staggered delivery times between all the occupiers of the building. Occasional small deliveries are made to the front entrance at early morning times to avoid disrupting the rear delivery yard schedule. This approach would no longer be possible during the time period that the hoarding would be in place for the construction works.

Access to Stack B - Trinity College Building Carpark

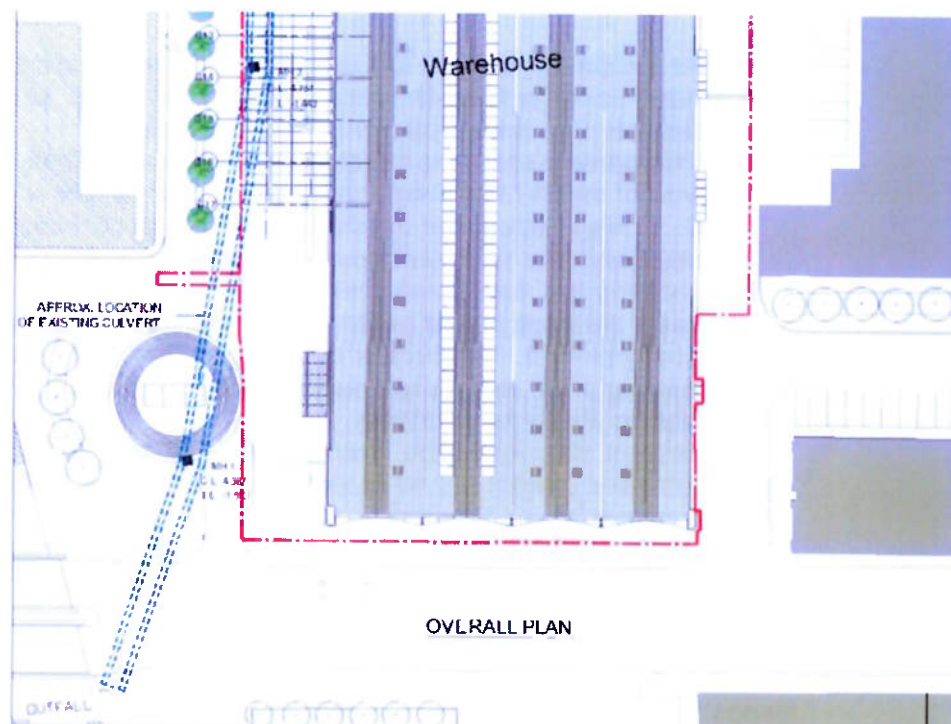
Access to the Stack B - Trinity College Building to the west of the CHQ Building was shared with pedestrians, cyclists and occasional deliveries over the public space area of approximately 40m. During the time period that the hoarding would be in place for the construction works this distance would be reduced to 5m and would generate numerous conflicts between the different users. It is

particularly concerning as a high 3.0m hoarding would generate a 'blind spot' at the rear corner with no visibility around this corner for cyclists or cars.

We would see this as a location for potential conflicts and accidents and as these would then occur on lands owned by the CHQ Building, in the event of a claim, CHQ would be drawn into the claim although they would have had no hand, act or part in generating the conditions that resulted in the accident occurring.

Location of Site Compound

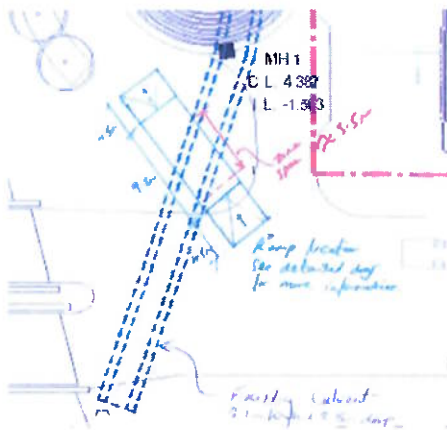
It is proposed to locate the Site Compound and works area directly above the original 1820's surface water drainage culvert for the CHQ Building and originally the wider area. This culvert was surveyed and upgraded during and after the 2002 works however there is some recent damage to the crown of the culvert caused by heavy truck movements above the culvert.



Site Plan showing location of Culvert in relation to Ownership Red Line of CHQ Building

CHQ commissioned an underground survey of the culvert and we established that the damaged areas were located in the areas within the ownership of Dublin City Council. This was communicated to DCC a number of years ago but as yet repair works are to be undertaken.

In July 2016, it was proposed to install a large installation within the IFSC complex which required a large crane. It was also decided that rather than risk further damage to the culvert, a temporary bridge would be brought in to span over the culvert and allow the crane pass over it. See photographs below.



Photographs of crane on bridge and plan location of bridge over culvert. Note: This location is within the proposed site compound area.

If the proposed CPO's were to be approved, we believe that the maintenance and responsibility of the culvert below this location would also be part of the ownership including the repairs and damage that is likely to occur and have repairs to be undertaken.

Lack of Visibility at corners of Site Compound

If the proposed site compound hoarding is to be constructed as per the CPO Mapping drawing, there will be a lack of visibility of the main entrance of the CHQ Building for an extended period of time during the construction works and with the construction period very likely to extend beyond two years if the construction compound and bridge replacement and relocation to occur as part of one contract.

Yours sincerely,

John Casey

for

CORA Consulting Engineers

APPENDIX 3: CHQ DUBLIN LIMITED LETTER

An Bord Pleanála
64 Marlborough Street
Dublin 1

11th April, 2024

Re: Objection to the 'Ringsend to City Centre Core Bus Corridor Application & Compulsory Purchase Order Scheme' with signatures of support from the companies that will be affected by NTA's suggested use of Plots 1003(1) and 1003(4) as Construction Compound for a period of 30 months outside the main entrance to The chq Building and its anchor tenant, EPIC The Irish Emigration Museum.

To whom it may concern,

We welcome the opportunity to make submissions on the Bus Connects Ringsend to City Centre Core Bus Corridor and associated Compulsory Purchase Order and set our concerns in this respect as follows.

We strongly believe that the suggested compound will decrease visibility and awareness of the main entrance to our building, which will result in reduced footfall, less spontaneous passing trade, decreased revenue, job losses and potentially even business closures. It will also limit access and pose a fire safety risk.

It will jeopardise the years of hard work we have put into giving this unique building a whole new lease of life and working with local businesses to turn Dublin's Docklands into a thriving business community and a vibrant cultural and social scene. It will also be at odds with DCC's policy to support and encourage the growth of cultural facilities in this area, especially when there is a perfectly viable alternative site nearby on the Campshires.

We have outlined the reasons for our objections more fully below.

Reduced Footfall

The chq Building itself attracts 1.5m people a year, who come in for meetings in Dogpatch Labs or for coffee, lunch or a snack. At least 40% of these visitors use our main entrance, which will be massively compromised if the NTA plans are signed off on. In addition to these visitors, EPIC The Irish Emigration Museum is expected to attract up to 420,000 visitors in 2024, the majority of whom will be entering through that southwest entrance, which EPIC considers their main entrance, hence their sign above the door.

The risk to CHQ businesses of blocking the main entrance

The chq Building houses several businesses that are working hard to attract both domestic and international visitors in an area that is still categorised as an upcoming area in terms of hospitality and tourism. The Docklands, both north and south, are hugely reliant on easily visible locations and open welcoming spaces that encourage visitors to linger and explore. These spaces are also used for gathering and welcoming groups of visitors and critically provide ample space for loading in and out for events. Blocking the area outside the CHQ entrance with a site office, a welfare facility and a car park, will halt and indeed damage this business effort to attract visitors. We are in a challenging market, with costs continuing to increase and a further decline in footfall will cause loss of revenue and lead to job losses, which may even risk some of our tenants going out of business.

Our investment in a footfall strategy will be in jeopardy if we have no clear and visible entrance

This clear and visible main entrance on the buildings west side is crucial to our efforts to increase footfall to The chq Building and the businesses operating within it. Blocking this main entrance for up to 3 years will seriously affect our strategy and jeopardise our large investment in attracting annually 500,000+ visitors to EPIC, as well as our plans to develop a CHQ Food Market, which would, with the current outside layout, bring in an additional 500,000 domestic and international visitors a year in its first 2 years of operation and will attract 1m or more thereafter. Restricting access at a time when we are working to increase footfall is completely at odds with what we are trying to achieve.

The role we play in increasing Docklands' tourism and creating a vibrant neighbourhood

This particular area in Dublin Docklands has a cluster of businesses trying to compete against a successful and overflowing city centre. Dublin Docklands, although close to the city centre, is still off the beaten track and faces the challenge of capturing the attention of the local office workers, as well as visitors to the city. Ensuring visibility and maintaining open welcoming spaces is essential in order for the hospitality industry to change that around.

We have worked collaboratively with the other businesses in our neighbourhood for the past 10 years to attract tourists and local people to the Docklands and slowly but surely we have built a once overlooked area into a thriving, bustling business, social and cultural hub. We want to keep the momentum going but a disruption like this could stop it in its tracks.

Importance of the Main Entrance in Attracting Visitors to the Docklands

The plan to block The chq Building's main west entrance and the outside terraces for up to 3 years with a large compound will significantly impact the businesses within and around The chq Building on a day-to-day basis.

Visibility of the area around the Triumphant Arch, our main entrance beside it and the Urban Brewings restaurant entrance further down on the west side has been and will continue to be vital in order for the businesses within the building to thrive. We have funded a Visitor Information Desk for the Docklands supported by Fáilte Ireland. We have high tourist footfall to this desk, many visitors are simply curious tourists passing by who are encouraged to come inside by the attractive entrance, which we fear we would lose if the planned compound goes ahead.

We see no reason for suggested compound not to be located on the Campshires, away from Docklands businesses, rather than straight in front of our main entrances.

EPIC Events use of the space for welcoming guests

For the event business, EPIC Events, which manages 150 high level events a year, the west entrance is vital for welcoming guests, as well as for loading equipment and supplies in and out. EPIC Events also works very closely with The Convention Centre Dublin in the Docklands, which is often used as the venue for social programmes. These events are almost always high profile, using the West entrance with entertainment at the door. It is essential for the overall

reputation of Dublin in the international congress market that we can continue to provide a world-class welcome.

We represent Ireland to global companies and foreign dignitaries

Our building and the organisations housed within it share Irish stories and celebrate our culture and heritage with many important global figures. We welcome heads of state, key political figures and worldwide celebrities, acting as ambassadors for Ireland so the initial impression we make is hugely important, not just to us but to the whole country.

Both **Dogpatch Labs** and **EPIC The Irish Emigration Museum** welcome many high profile people and delegations each year – some recent examples include the Prime Minister of France, the President of Ireland, the launch of the Sinn Féin programme 2023. These delegations are extremely important both for the businesses and the Docklands destination.

EPIC The Irish Emigration Museum has a close working relationship with the Department of Foreign Affairs, having produced 7 exhibitions, which were launched here at CHQ, as well as opening our doors to various government visits, from Justin Trudeau to a British Royal visit a few years back.

Welcoming international, as well as domestic delegations, into Dogpatch Labs and EPIC the Irish Emigration Museum will be greatly affected by these plans. The area around The Triumphant Arch plays a vital role in giving the best first impression of our capital city to international visits, often accompanied by international media. Hosting these current events to the same level will become very difficult or indeed impossible going forward under the plans that NTA has outlined.

Employment and potential loss of jobs

Our food and beverage tenants are already struggling due to the cost of business, the VAT increase and reduction in footfall post-Covid due to the increased implementation of hybrid working. Any future loss of footfall will be enough to make operations commercially unviable and could ultimately result in a loss of tenants.

Dublin Docklands Tourism and creating a vibrant neighborhood

We are committed to making Dublin Docklands a must-visit part of the city. We continue to work closely with Fáilte Ireland, DCC and Dublin Port in an effort to improve the offering in Dublin Docklands as a way to attract the tourists here and thereby spread out the visitor numbers coming to Dublin to encourage sustainable growth.

Open spaces are key to this strategy. This is something that other European cities have created and ensured remained, creating neighborhoods of interest and natural places to gather. There are such few open spaces in Dublin that we need to preserve them at all costs.

We also work with Fáilte Ireland and many stakeholders within Dublin Docklands to change the perception of our neighborhood among the domestic audience and having open spaces for leisurely relaxation is an important draw that these NTA plans will significantly hinder and delay.

We see the George's Dock area, with its Arch beside The chq Building, as the entrance to Dublin Docklands, and we believe that its strength is in its size, making the area look inviting and encouraging visitors to stop, explore and indeed to continue down along the Campshire or walk further into the IFSC, visiting various cafés and retail shops.

Adding a site office, staff welfare facilities and employee parking spaces right in front of the main entrance to The chq Building and the walkway down to Urban Brewing restaurant for up to 3 years is simply unacceptable and will undoubtedly have a negative impact on visitor numbers and therefore on the businesses that continue to try to recover and adapt to a difficult market with higher costs and with office workers working hybrid.

We agree with your statement that *"Sustainable transport infrastructure assists in creating more sustainable communities and healthier places to live and work while also stimulating our economic development and contributes to enhanced health and well-being when delivered effectively"*. However, if the primary aim of enhancing transportation infrastructure is to foster sustainable communities and drive economic development, as asserted, it becomes evident that this new infrastructure will, ironically, hinder the growth of the nearest businesses. This obstruction risks stifling the revitalisation efforts that CHQ, in collaboration with DCC and other partners, are diligently pursuing to rejuvenate the outdoor

and night-time economies in this area of the city. Consequently, the proposed structure threatens to undermine the intended objectives, compelling us and the undersigned to vehemently oppose its construction.

Yours Sincerely,



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