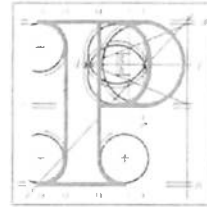


Our Case Number: ABP-317679-23

Your Reference: Custom House Docks Management Ltd



An
Bord
Pleanála

Tom Phillips & Associates
80 Harcourt Street
Dublin 2
D02 F449

Date: 12 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

Lauren Griffin

From: Lauren Griffin
Sent: Thursday 11 April 2024 16:37
To: Sine Kelly
Subject: RE: Submission - Refs. ABP-317679-23 & ABP-317735-23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Sine Kelly <sine@tpa.ie>
Sent: Thursday, April 11, 2024 4:26 PM
To: LAPS <laps@pleanala.ie>
Subject: Submission - Refs. ABP-317679-23 & ABP-317735-23

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it concerns

Please find attached a submission in response to the NTA's responses to the Third Party Submissions made in relation to the Ringsend to City Centre Core Bus Corridor Scheme (Ref. ABP- 317679-23) and its associated CPO (Ref. ABP- 317735-23) being made on behalf of our Clients, Custom House Docks Management Ltd and Custom House Docks Basement Management Ltd.

I would appreciate acknowledgement of your receipt of this submission at your earliest convenience.

Kind regards

Sine

Sine Kelly
(pronounced: shee-na)
Associate

Tom Phillips + Associates
Town Planning Consultants



Contact

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Tom Phillips and Associates Limited: Dublin and Cork

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Tom Phillips + Associates Limited. Registered in Ireland No. 353333, 80 Harcourt Street, Dublin 2, D02 F449

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

11th April 2024
[By email laps@pleanala.ie]

Dear Sir / Madam

Re: Submission in respect of the NTA's Responses to Submissions Received in respect of the Application for a proposed road development for the Ringsend to City Centre Core Bus Corridor Scheme and associated Compulsory Purchase Order.

Application ABP Reference ABP-317679-23

CPO ABP Reference ABP-317735-23

- CPO Ref.: Plot Lists 1003(1).1c, 1003(2).1g, 1003(3).1z, 1003(4).2c, 1003(5).2z

1.0 INTRODUCTION

Custom House Docks Management Ltd¹ and Custom House Docks Basement Management Ltd² has retained Tom Phillips + Associates³, Town Planning Consultants and NRB Consulting Engineers to prepare this submission.

This Submission is made in response to two letters received from An Bord Pleanála in respect of the Application (Ref. ABP-317679-23), dated 7th March 2024, and the CPO (Ref. ABP-317735-23), also dated 7th March 2024.

Whilst not in the control of the NTA, our Client is disappointed that no Oral Hearing will be undertaken by the Board in relation to either the Application or CPO.

We have reviewed the contents of both the *NTA Observations on the Proposed Scheme Submissions*, dated November 2023 and *NTA Observations on Compulsory Purchase Order Objections*, dated November 2023. Whilst we note the contents of both documents, our Client continues to have concerns regarding the details of the Application and CPO. It is our opinion that the concerns originally raised have not been addressed in full.

¹ Apleona Ireland Real Estate Ltd, Landscape House, Landscape Road, Churchtown, Dublin 14.

² Apleona Ireland Real Estate Ltd, Landscape House, Landscape Road, Churchtown, Dublin 14.

³ TPA, 80 Harcourt Street, Dublin 2, D02 F449.

2.0 ANALYSIS OF ISSUES RAISED WITH THE CPO

We reply to the NTA’s response to the issues raised in our original submission in the following Sections.

2.1 Key Issues Arising from CPO

Our Clients acknowledge the discrepancies highlighted by the NTA in the images provided illustrating the temporary CPO land-take. Our Clients welcome the proposal to ensure that pedestrian access will not be impeded to and from the George’s Dock area, the CHQ Building and EPIC Museum and North Wall during the construction period and that a 5m wide area is provided between the construction compound and the CHQ Building (presented as revised Figure 5.2 – see Figure 2.1 below).

However, the NTA has not addressed our Clients’ concerns regarding the potential site hoarding associated with the compounds between Custom House Quay and the bridge to create a pinch-point for pedestrians and cyclists accessing / egressing the IFSC via the footbridge across the River Liffey, with the hoarding having a potential to create blind-spot. Our Clients’ request the Board ensure that the NTA protects the free flow of pedestrian traffic around this area on the temporary and permanent acquisition of the lands.

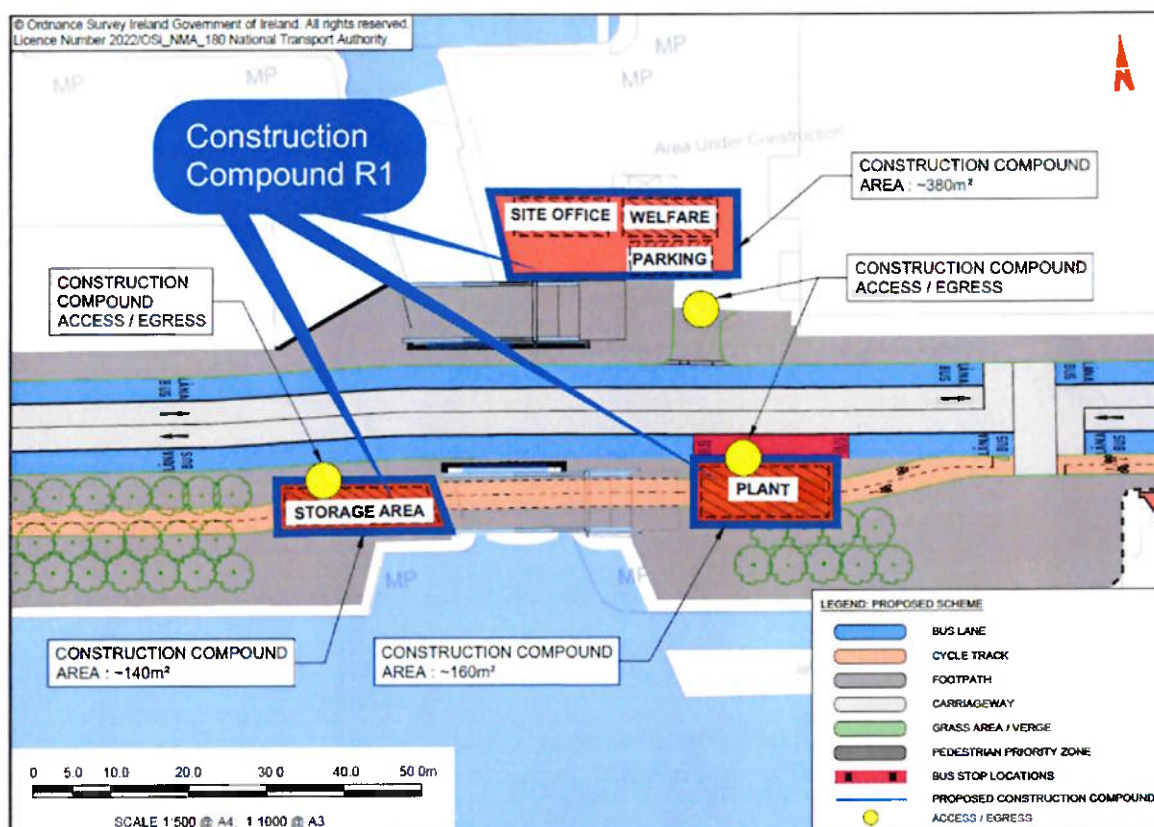


Figure 2.1: Revised Image 5.2 from EIAR Chapter 5 with Compound Area Corrected. (Source: Extract from NTA Observations on Compulsory Purchase Order Objections, dated November 2023.)



Whilst it is acknowledged that the relocation of the Scherzer Bridges will be complex, our Clients are disappointed that the NTA anticipate a total 30 month temporary acquisition period from the start of construction to reinstatement for these highly disruptive works in such close proximity to their property and request the Board and the NTA to reduce this timeframe as short as possible.

It is noted that the NTA intends to ensure that the piles layout will be done to ensure that the existing underground culvert will be avoided, along with monitoring of same. We request the Board to require the NTA to protect the culvert liaising with Dublin City Council as necessary during the construction and reinstatement works.

Lastly, the NTA has not clarified or provided a realistic timeline from the agreement of treaty to the payment of compensation. Clarity is sought on this before the Board makes a decision on the CPO.

3.0 ANALYSIS OF ISSUES RAISED BY THE APPLICATION

Our Clients concerns around access / egress to and from the Custom House Docks area of the IFSC, particular how this will affect access to and from the properties (and tenants in-situ) served by these roadways has not been adequately resolved by the NTA. In particular, our Clients remain opposed to the removal of right turn onto commons street travelling from east and resultant diversions.

3.1 Removal of Right Turn onto Commons Street Travelling From East and Resultant Diversions

We note that our concerns around access / egress to the Customs House Docks area (and how this may affect overall traffic flows in the area) do not appear to have been addressed in any meaningful way in the NTA response.

The NTA have confirmed that a prohibition of right turning traffic from North Wall Quay into Commons Street is being maintained in the proposed scheme. This is illustrated in the annotated NTA Drawing extract included below as Figure 3.1.

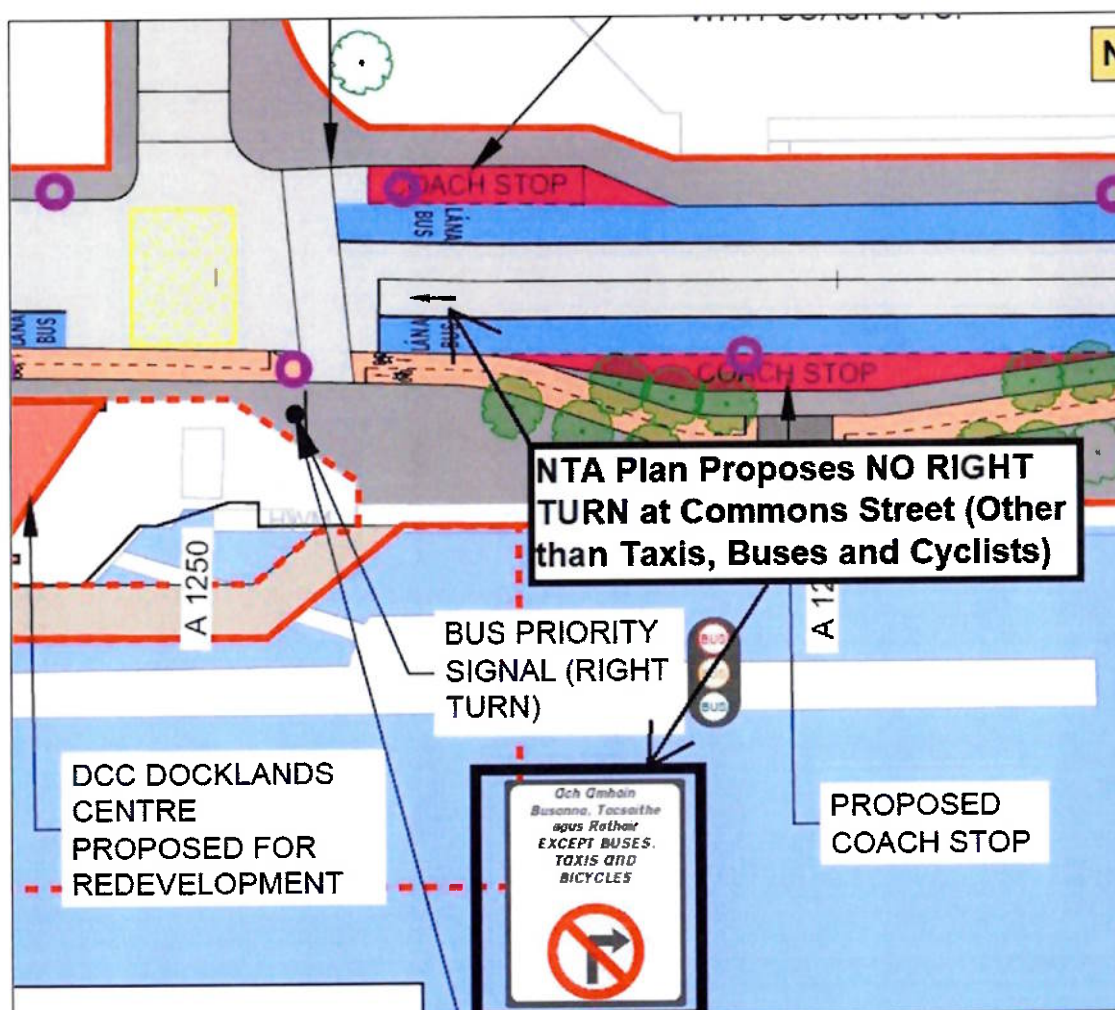


Figure 3.1: Annotated extract from NTA Application Drawings. (Source: Extract from General Arrangement Sheet 02 of 12, with annotation by NRB Consulting Engineers.)

Commons Street provides access for the majority of traffic accessing the International Financial Services Centre (IFSC), which has in excess of 30,000 employees we understand. The prohibition of right turning from North Wall Quay will have a significant knock-on effect and will increase traffic congestion & change vehicular patterns in the area.

This is mentioned in Paragraph 2.1.3.2 of the *NTA Observations on the Proposed Scheme Submissions*, dated November 2023.

Within this Report, the NTA do not provide any explanation or rationale to justify the prohibition of the right turn, rather they admit that there will be a **significantly greater travel distance** (and associated time) required to access the area. We include below the relevant extract from the NTA Report.

- 4) Coming from East Wall Road, rather than continue to the Point roundabout and turn onto North Wall Quay, traffic should turn right onto Sheriff Street Upper, continue onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. It is likely that most traffic uses this route already to avoid congestion at the Scherzer Bridges at Spencer Dock. The journey distance from East Wall Road at the junction with Sheriff Street Upper to the IFSC car park on Commons Street is the same at 1.7km via either route.
- 5) Coming from the East Link Bridge, rather than turn left at the Point roundabout onto North Wall Quay, traffic should continue north to turn left onto Sheriff Street Upper, continue onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. It is likely that most traffic uses this route already to avoid congestion at the Scherzer Bridges at Spencer Dock. The journey distance from The Point Roundabout to the IFSC car park on Commons Street will increase by 0.6km from 1.4km to 2.0km.
- 6) Coming from Samuel Beckett Bridge, rather than turn left onto North Wall Quay, traffic should continue north on Guild Street and onto Seville Place, before turning left onto Oriel Street to access the Mayor Street area. The journey distance from the Beckett Bridge to the IFSC car park on Commons Street will increase by 0.55km from 0.45km to 1.1km.

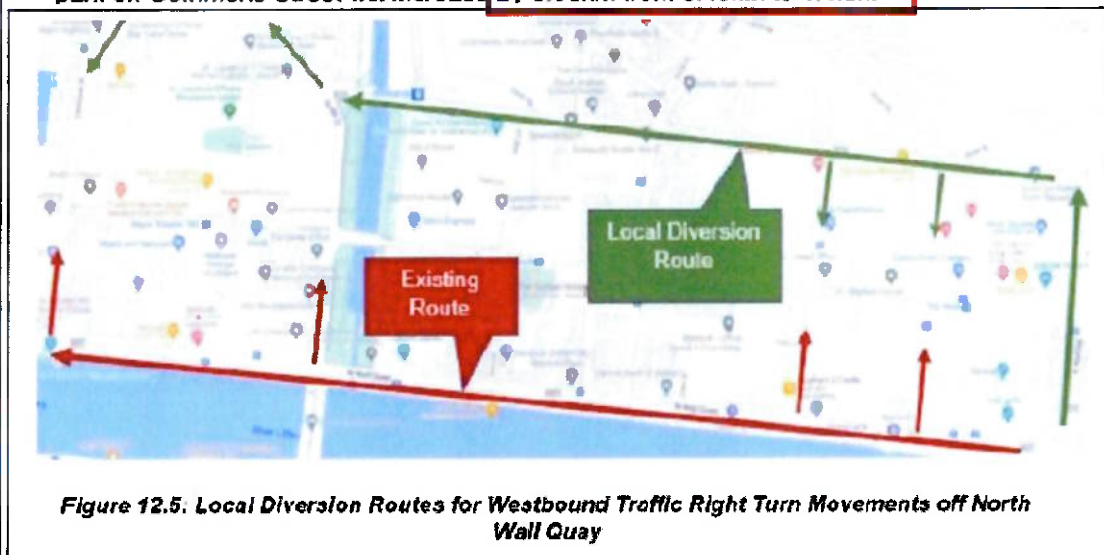


Figure 2-1-7: Local Access Map to Mayor Street Area (from PDR Chapter 12)

Figure 3.2: Local diversions. (Source: Extract from *NTA Observations on the Proposed Scheme Submissions*, with annotation by NRB Consulting Engineers.)

This additional travel distance and time taken for vehicles will have a significant adverse environmental impact in terms of Vehicle-Km annually on the network. It is our opinion that this has not been assessed within the Environmental Impact Assessment for the scheme.

The EIAR assesses impact on Air Quality (Chapter 7) of the scheme but does not appear to have fully assessed the impact of the above diversions. See below Figure 3.3 for the NO₂ concentration map. The icons represent air quality receptors where grey indicates no change, green indicates beneficial change, and yellow indicates negative change. While receptors on Seville Place show negligible impact on air quality, there does not appear to be receptors assessing the impact of diversion of westbound traffic on Sherrif Street Upper. This applies to PM₁₀ and PM_{2.5} also.

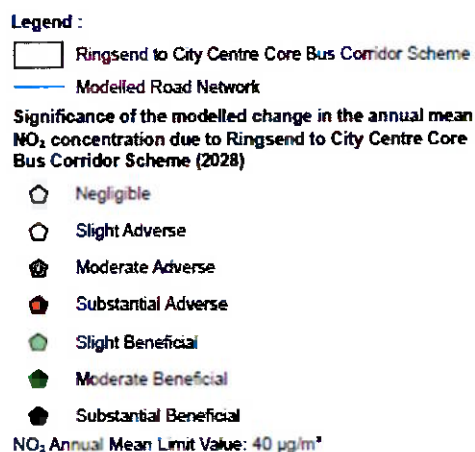
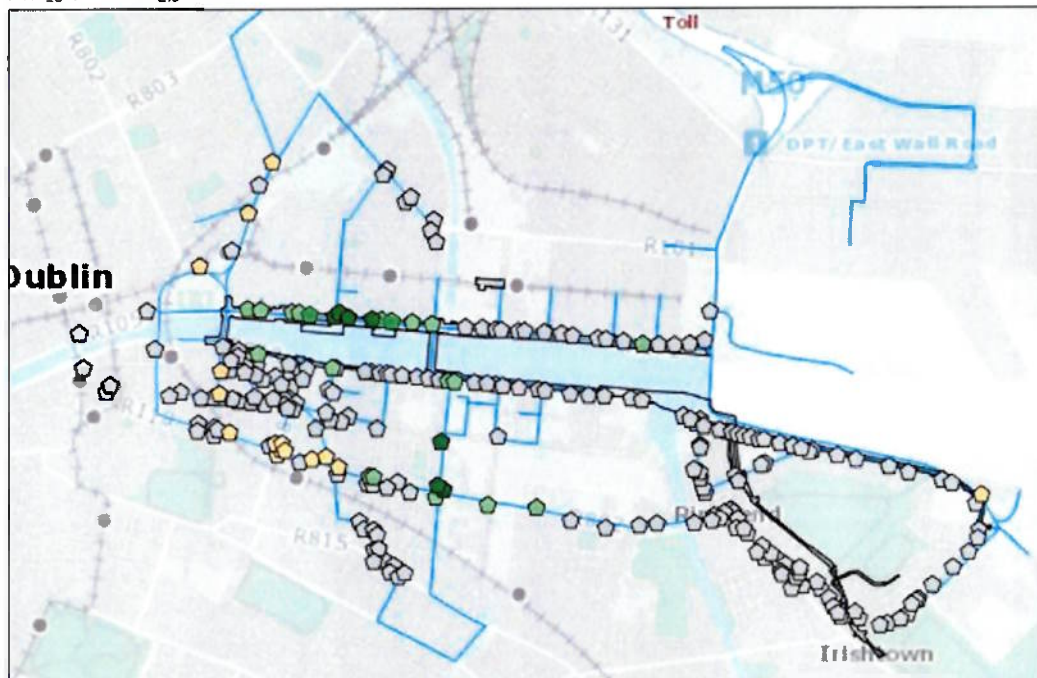


Figure 3.3: Sheriff Street and neighbouring streets air quality impact not assessed having regard to the diversions arising. (Source: Extract from Figure 7.3 of the *Environmental Impact Assessment Report*, dated July 2023.)

Similarly with an assessment into additional traffic generation caused by the scheme, Sherriff Street Upper does not appear to have been assessed. It is noted that R101 Seville Place will experience an increase of 216 trips in the AM Peak Hour. The below graphic shows the impact

on the surrounding road network, where red colours indicate an increase in trip generation over the existing level. Junction analysis for the General Traffic Assessment found the impact to be 'Low to Negligible' for junctions between Seville Place, Oriel Street, Sherriff Street Upper and Guild Street. The junction at Seville Place / Sheriff Street Upper / Guild Street reaches near maximum capacity in the AM peak.

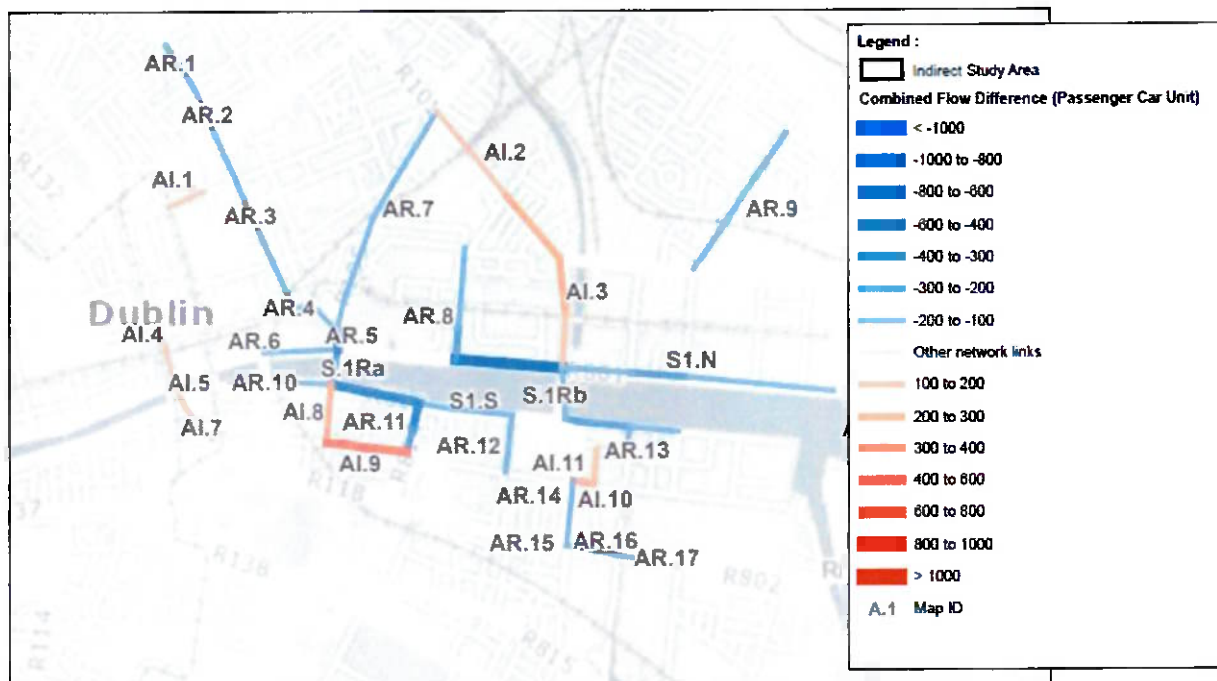


Figure 3.4: Flow difference on road links in the vicinity. (Source: Extract from Figure 6.7 of the *Environmental Impact Assessment Report*, dated July 2023.)

Conscious that the existing Commons Street Public Car Park has 370 No. parking spaces alone, NRB Consulting Engineers has undertaken a rudimentary very basic illustrative example or calculation of the effect and impact of the proposed banning of the right turns, using the NTAs own supplied additional travel distances.

NRB Consulting Engineers has assumed for the purposes of this simple desktop example that this will 'only' affect 1,000 vehicle movements per day (and the reality is that significantly more will likely be affected):

- 1,000 Vehicle Trips per day,
- Multiplied by 0.6km daily extra travel distance,
- Equals 600km additional vehicle km of travel,
- Multiplied by 7-days per-week equals 4,200 additional vehicle km of travel weekly,
- Multiplied by 52 weeks equals 218,400 additional vehicle km of travel annually,
- This equates to 13,650 Hours of driving at an estimated average driving speed of 16km/hr for Dublin City.

There will also be a corresponding increase in CO₂, particulate and other harmful vehicle emissions associated with this increased travel distance in vehicles, and, to reiterate, it is our opinion that this has not been considered within the EIAR.

There will be a significant adverse effect of this additional traffic routing on the mainly-residential area of the inner city (i.e. Sheriff Street and surrounding streets), and it is contended that this has not been taken into consideration in terms of residential nuisance, noise or air quality.

Notwithstanding the above, we reiterate that *Design Manual for Urban Roads and Streets* (DMURS) promotes permeable networks as a means to naturally traffic calm, reduce driver frustration and reduce traffic impact, and a prohibition of right turns would appear to be contrary to DMURS recommendations.

There is a simple solution, which is to accommodate and maintain the right turn that exists for traffic from North Wall Quay to Commons Street. The existing layout, with the main features, is as depicted on the Google Streetview Image included below as Figure 3.5.

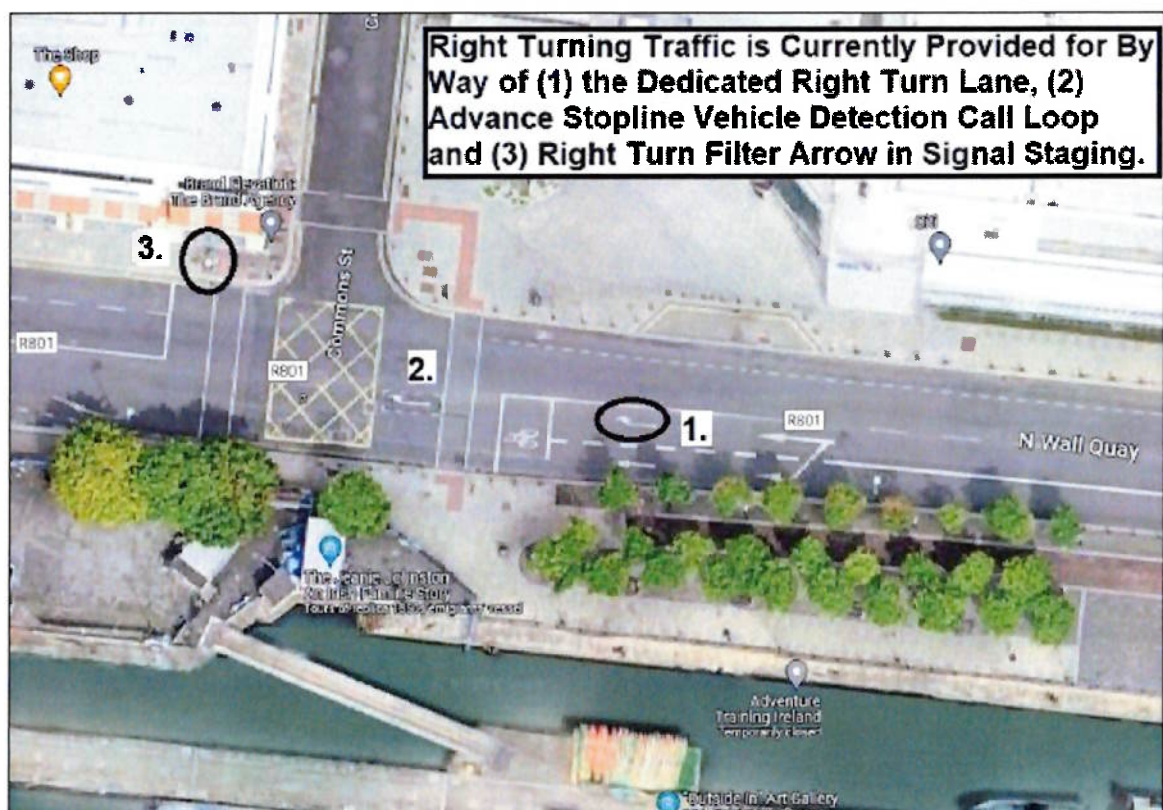


Figure 3.5: NRB Consulting Engineer’s Annotated Google Aerial Streetview of existing right turn lane.

This right turn feature can easily be accommodated in the NTA design with minimal effect and it is contended that bus priority, as is planned, is fully maintained.

In fact it can reasonably be argued that this would greatly improve operation, given that taxis and buses are facilitated to make the right turn under the current plans without any filter lane provision – in effect blocking straight-through westbound traffic on North Wall Quay.

We therefore suggest that the NTA and ABP maintain the right turn lane and remove the intended right turn prohibition at this junction so as to minimise the knock-on adverse effects



on the entire Docklands Area, as well as potential adverse environmental effects on the resident population of the neighbouring streets.

3.2 Potential Disruptions

The NTA has not adequately addressed our Clients concerns regarding the significant impact the proposed construction works, and significant diversions, closures, restricted access and construction-related traffic, will have due on the area for a prolonged period of time.

Furthermore, our Client's concerns regarding potential significant impacts on infrastructure and utilities during the construction phase has also been unaddressed by the NTA. We repeat from the original submission that the tenants of the IFSC experienced disruption during the construction of the Red Line Luas, such as power outages, broadband outages, water supply issues, drainage issues etc. which was extremely disruptive to the operation of the IFSC. Our Clients again request certainty that similar instances would not occur as a result of these works.

The importance of the continued and uninterrupted operation of the IFSC cannot be underestimated and we request the board to take these potential impacts fully into account in assessing the application, and in the event of a grant of permission, ensure that appropriate mitigation measures are required to be implemented at all stages of the project to protect the importance of the IFSC area, the landowners, the existing tenants and visitors to the area.

4.0 CONCLUSION

We confirm that our Clients welcome the implementation of the Ringsend to City Centre Core Bus Connects Scheme and is supportive of the delivery of this strategically important infrastructure project.

However, as identified above, our Client is not satisfied that all concerns raised in the original submission have been addressed adequately by the NTA and further amendments and clarifications are requested.

Again, our Clients would welcome the opportunity for further engagement with NTA to ensure that the access and egress arrangements are safeguarded at each stage of the project, including during the Board's assessment of both the application and the CPO, and beyond these stages at construction and operation phases.

We trust that the above is in order.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Síne Kelly', is written over a horizontal line.

Síne Kelly
Associate
Tom Phillips + Associates