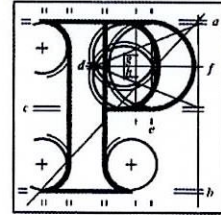


**Our Case Number:** ABP-314056-22

**Your Reference:** General Paints Group



**An  
Bord  
Pleanála**

Hughes Planning & Development Consultants  
85 Merrion Square  
Dublin 2  
D02 FX60

**Date:** 26 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

  
\_\_\_\_\_  
Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

**AN BORD PLEANÁLA**  
LDG- 057226-22  
ABP- \_\_\_\_\_  
13 SEP 2022 *o.k*  
Fee: € 50 Type: clp  
Time: 17:25 By: Ward

# Liffey Valley to City Centre Core Bus Corridor Scheme Submission (Ref. No. 314056)

**Submitted on Behalf of:**  
General Paints Group  
Maynooth Road, Celbridge, Co. Kildare, W23 X7R8

13<sup>th</sup> September 2022

85 Merrion Square, Dublin 2, D02 FX60  
+353 (0)1 539 0710  
info@hpdc.ie  
www.hpdc.ie

### 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, General Paints Group, to make a submission in respect of the Liffey Valley to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA).

This submission, which is accompanied by the relevant submission fee (€50), is made in response to a public notice, available at <https://liffeyvalleyscheme.ie/>, inviting submissions, up until 13<sup>th</sup> September 2022, as part of a public consultation process in to the route corridor (Ref. No. 314056).

The purpose of this submission is to outline our client's concern to the intended route option. We note the map which presents the location of the route corridor as presented in Figure 1.0, below.

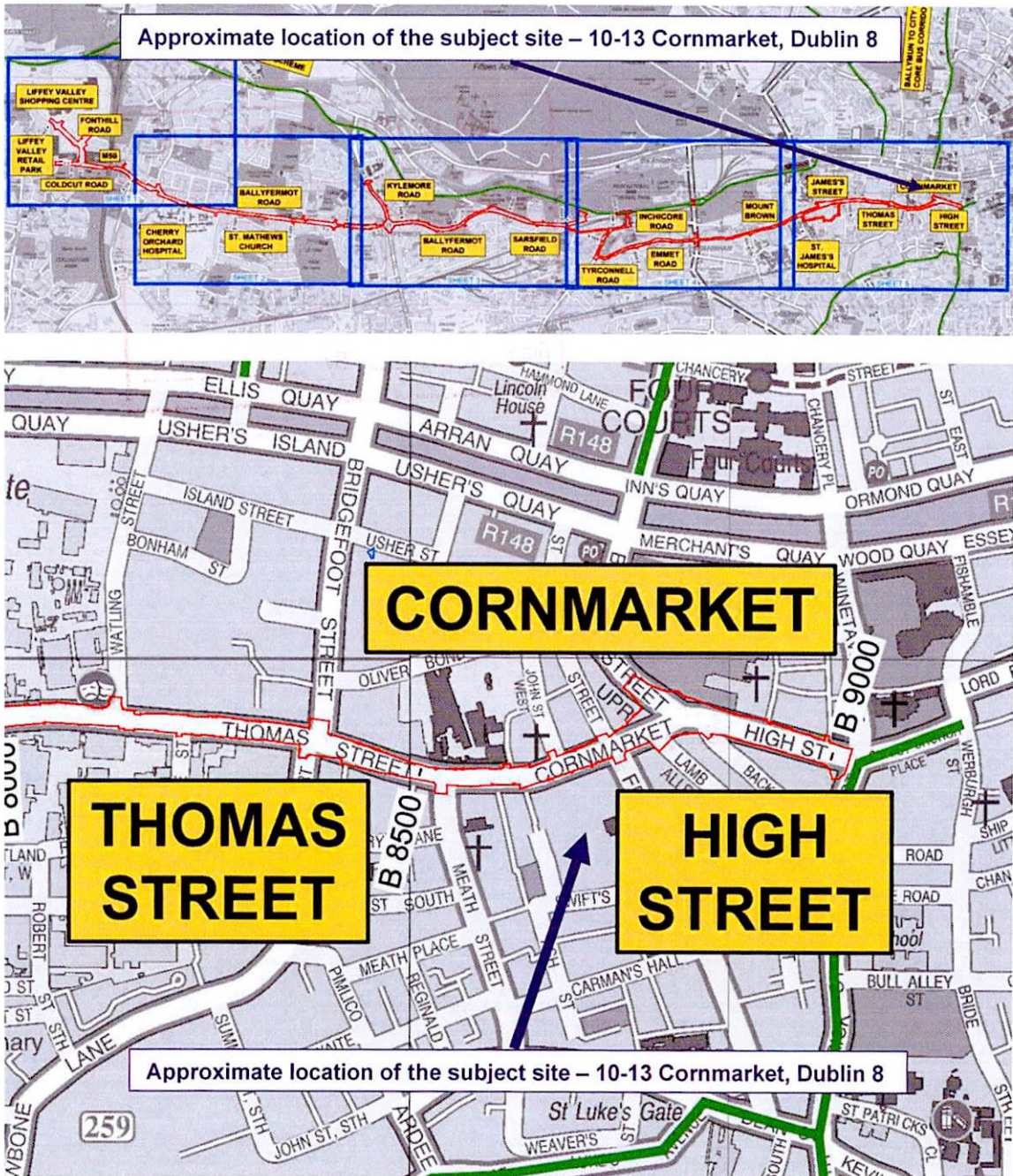


Figure 1.0 Extracts from the proposed scheme boundary illustrating the location of our client's site (red outline) relative to the intended route option.

## 2.0 Subject Site

The site to which this submission pertains, 10-13 Cornmarket, Dublin 8, is located on the northern side of Cornmarket in the heart of the liberties. The site extends to approximately 0.11 hectares and is occupied by the property which accommodates MRCB Paints and Papers, which is owned by our client. Our client's property fronts onto Cornmarket, occupying the ground floor level of the four storey building presented in Figure 2.0, below, before extending significantly to the rear and west. This property is adjoined by a construction supplies business, which is primarily targeted towards homeowners as opposed to commercial businesses, and HSE offices.

To the immediate front of our client's property exists a long-standing parking bay of 5 no. parking spaces, inclusive of 1 no. accessible parking space. These parking spaces facilitate an easy means of collection for pre-ordered decorating supplies together with general shopping and the attendance by customers of in-store consultations prior to purchase.

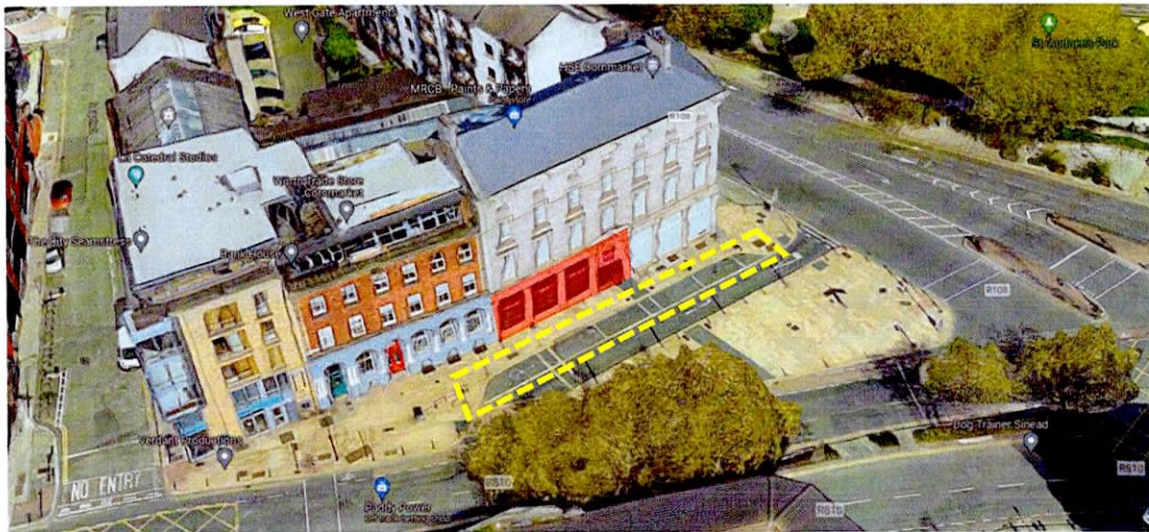


Figure 0.0 Aerial image looking northwards towards our client's site (red fill). We note the vehicular parking bay (yellow dashed line) to the immediate front of the building.



Figure 2.0 Street-view image of the subject site. We note that the car parking bay is fully occupied in this image.

### 3.0 Bus Connects Proposal Relative to Subject Site

As per the documentation available at <https://liffeyvalleyscheme.ie/>, the Liffey Valley to City Centre Core Bus Corridor Scheme proposes the general revision of pedestrian/vehicular infrastructure to the immediate front of our client's property.

The existing 5 no. space parking bay to the front of our client's site and another 2 no. space loading bay located in close proximity on Bridge Street, are to be omitted and replaced with extended pedestrian footpaths. The roadway will be revised to provide dedicated bus lanes either side of a central general-traffic lanes with dedicated bicycle lanes adjoining the pedestrian footpaths. A smaller 3 no. space parking bay, providing a mix of 1 no. accessible parking space and 2 no. loading spaces, will also be provided.

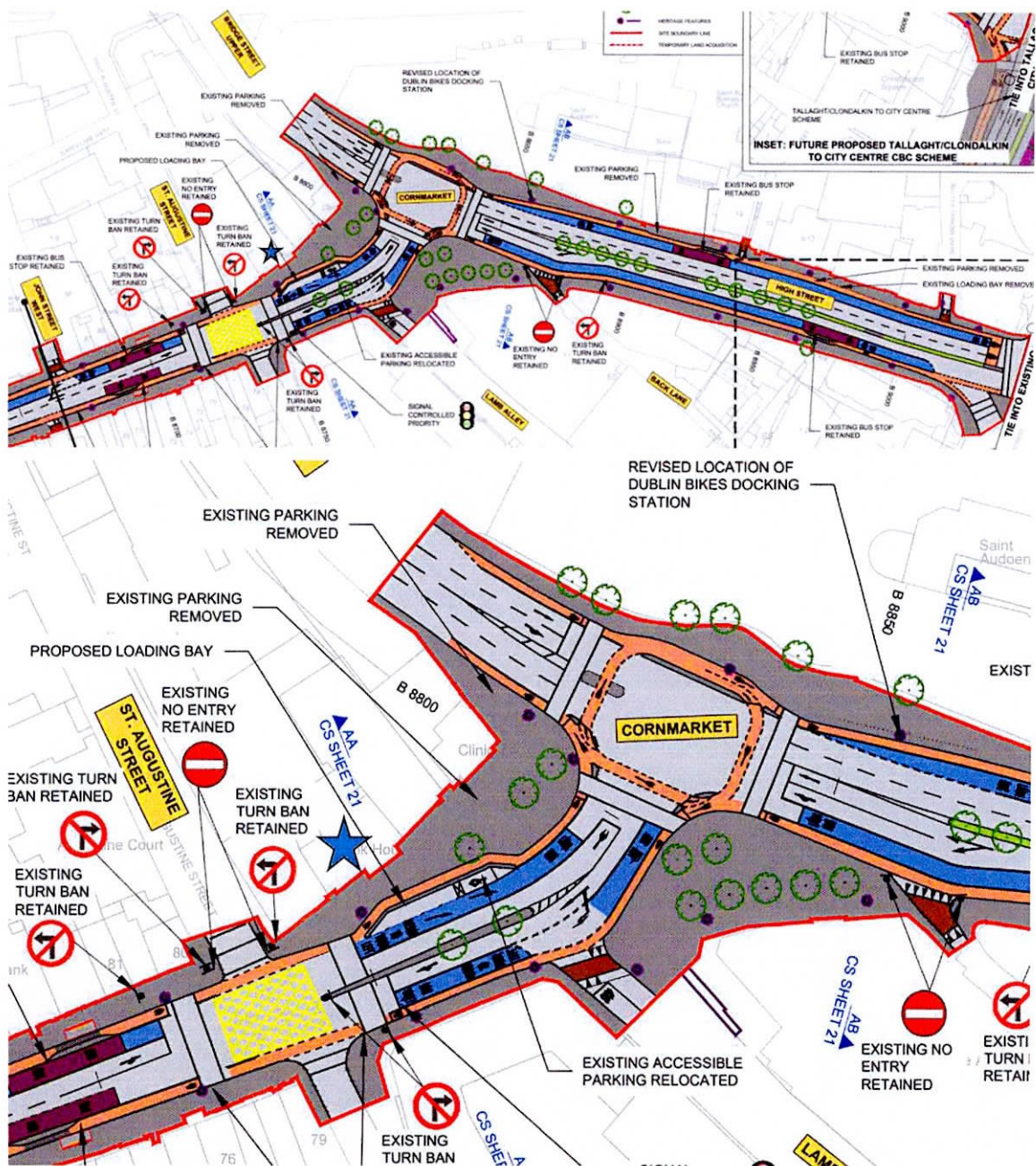


Figure 3.0 Extracts from Sheet 28 of the General Arrangement drawing illustrating the proposed works relative to our client's site (blue star).

#### 4.0 Impact of Bus Connects Proposal on Subject Site

Having regard for the nature of the proposed works and the proximity of these works to our client's site, we would consider the Liffey Valley to City Centre Core Bus Corridor Scheme to present direct impacts to the commercial viability of our client's business.

The following section of this report will expand upon the commercial impacts which will occur as a result of the aforementioned scheme.

#### 4.1 Reduced Accessibility & Convenience

The primary ground for observation relates to the loss of existing car parking spaces in the area and, more specifically, the impact of the reduced number of car parking spaces on our client's business. From the outset, we wish to submit that the proposed works will significantly reduce the quantum of car parking spaces serving this business at present and it is thus submitted that this will have a direct economic impact on the business.

With regards to the loss of car parking spaces, we would first acknowledge the general retention of spaces within the wider vicinity of the site, namely on St. Augustine Street, Francis Street and Lab Alley. Notwithstanding the retention of these spaces, we would contend that the spaces to the front of our client's building are of intrinsic importance to the success of this commercial operation as they provide convenient vehicular parking for the purchase of the bulky goods associated with decorating, namely wallpaper, paint and their associated tools.

The inability of our client's customers to conveniently access the premises and transport their purchases to their vehicle will lead to a loss of on-site sales which, as opposed to online purchases, is generally the more lucrative option given the opportunity to upsell to customers.

It is considered prudent, given the nature of the impact which arises as a result of the subject scheme on our client's commercial operation, to note and respond to the following policies of the Dublin City Development Plan 2016-2022:

**MT14:** *To minimise loss of on-street car parking, whilst recognizing that some loss of spaces is required for, or in relation to, sustainable transport provision, access to new developments, or public realm improvements.*

Whilst our client acknowledges the practical benefits of the Bus Connects scheme in the context of improving general accessibility into Dublin City Centre, it is considered that the proposed works represent a significant and detrimental impact to a business which has historically relied on the subject parking bay. It is submitted that the provisions of the Bus Connects scheme do not seek to minimise the loss of on-street parking but, rather eliminate same in favour of sustainable transport provision and public realm improvement.

In terms of the proposed works, it is evident that a balance has not been achieved between the need to provide convenient vehicular parking and accommodate expanded vehicular and pedestrian infrastructure. The proposal and resultant reduction in car parking spaces will compromise the ease in which our client's customer base has historically enjoyed access to this business.

**MT15:** *To discourage commuter parking and to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses.*

It is submitted that the proposed works will not result in the retention of an adequate number of vehicular parking spaces to provide for short-term shopping for a long-established commercial use at this location.

Having regard to the above reasoning, we would thus state our client's complete objection to the removal of the existing 5 no. space parking bay, as presented on the proposal drawings, on the basis of the significant and directly resulting commercial impact and the fact that the proposed works are contrary to the provisions of the Dublin City Development Plan 2016-2022.

### 5.0 Alternative Design Options

Given the direct impact of the Liffey Valley to City Centre Core Bus Corridor on our client's commercial operation, it is considered appropriate to suggest alternative design options for consideration by the Board. It is submitted that both of the options presented below represent appropriate options which will not compromise the primary aim of the scheme, that being improved accessibility to the city centre for bus/bicycle traffic, whilst ensuring the long-term protection of convenient vehicular parking which is crucial to our client's commercial operation.

#### 5.1 Option 1 - Extension of Replacement Parking Bay

Option 1 comprises the alteration and extension of the replacement parking bay to provide 2 no. additional pay/display parking spaces which would lessen the impact of the subject scheme. Figure 0.0, below, presents a comparison of Option 1 against the proposed design.

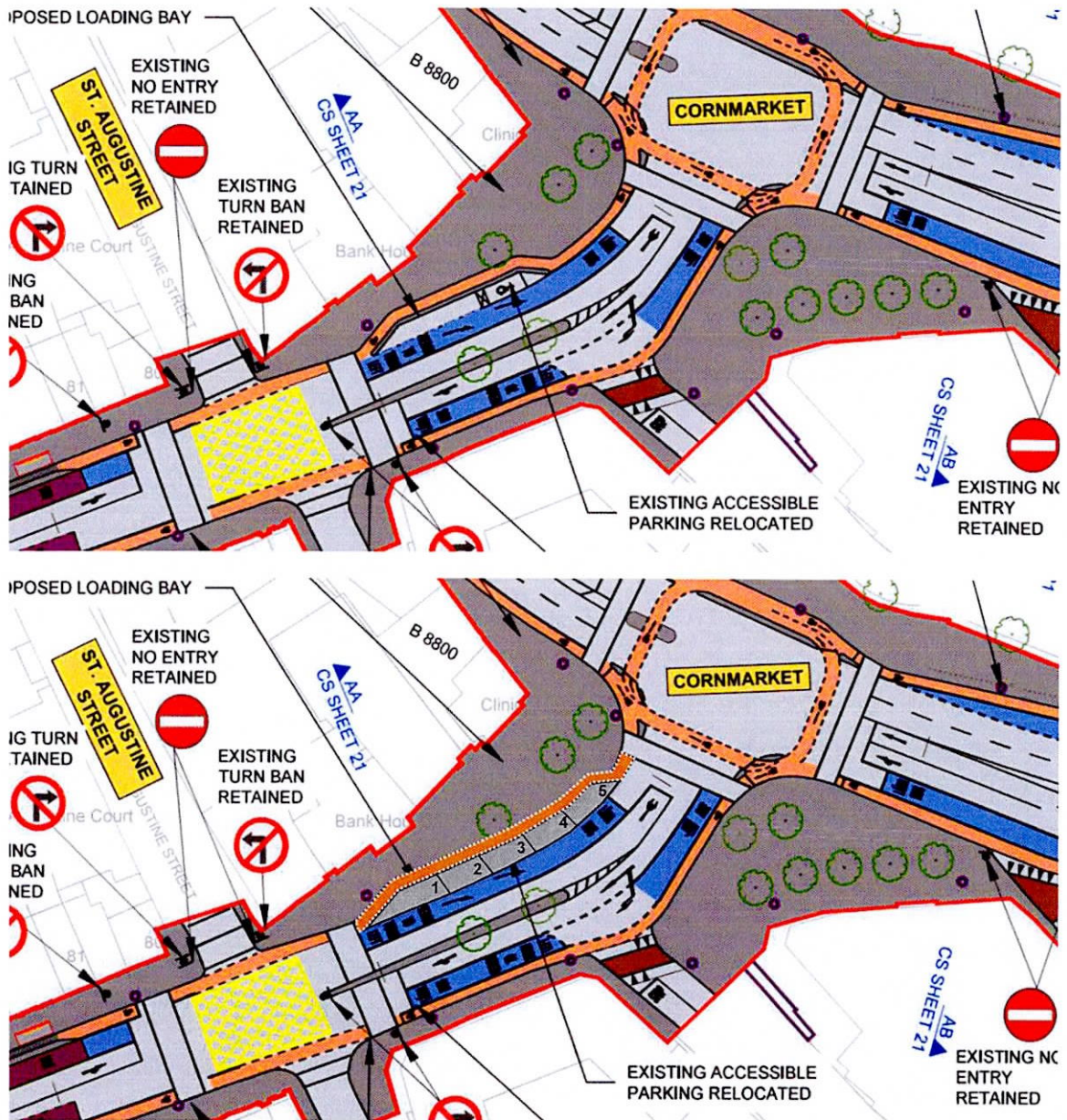


Figure 4.0 Comparison of as proposed (top) loading/parking bay and Option 1 (bottom) which provides for an extended loading/parking bay.

Whilst Option 1 provides 50% less standard vehicular parking spaces than exist in close proximity to our client's site at present, it ensures that customers can still avail of convenient parking spaces for purchase of bulky goods at our client's business. It is considered that the extended parking bay offers further protection for cyclists en route to the Hill Street junction and it is noted that the extended parking bay would have no significant effect on the operation of the bus lane.

## 5.2 Option 2 – Dual Purpose Loading Bay

Option 2 comprises the use of appropriate signage to allow the use of the proposed loading bay for general vehicular parking outside of core loading hours. This would allow the newly proposed spaces to serve a dual purpose and would not necessitate the alteration of the parking bay as designed whilst allowing for a minimal quantum of vehicular parking spaces.

## 6.0 Conclusion

In conclusion, the compromise to convenient access by customers of our client's commercial business arising from the removal of long-standing vehicular parking spaces clearly renders the Liffey Valley to City Centre Core Bus Corridor Scheme as non-compliant with the proper planning and sustainable development of the area as it relates to our client's property at 10-13 Cornmarket, Dublin 8.

It is considered, for the above reasoning, that the subject scheme will be detrimental to the commercial performance of our client's business due to the direct impediment to customer accessibility it presents as proposed. In this regard, we would herein confirm our client's willingness to engage with the National Transport Authority (NTA) to identify suitable mitigation measures to ensure the adequate protection of their commercial interests at this location.

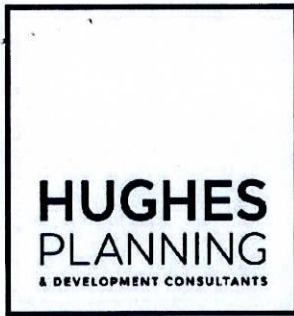
We trust that the Board will have regard to the contents of this submission in relation to the wider public consultation process on the Blanchardstown to City Centre Core Bus Corridor Scheme.



Kevin Hughes MIPI MRTPI  
Director for HPDC Ltd.



**Appendix A Letter of Support for Submission by General Paints Group**



An Bord Pleanála  
64 Marlborough Street,  
Rotunda,  
Dublin 1,  
D01 V902

13<sup>th</sup> September 2022

**RE: Submission on Liffey Valley to City Centre Core Bus Corridor Scheme (Reg. Ref. 314056)  
Lodged by General Paints Group**

Dear Sir/Madam,

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, Diacon of Estate House, 3 Proud's Lane, St. Stephen's Green West, Dublin 2, D02 HC66, to prepare this letter in support of a submission lodged by General Paints Group of Maynooth Road, Celbridge, Co. Kildare, W23 X7R8, against the Liffey Valley to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA).

Diacon are the landlord of No. 10-13 Cornmarket, Dublin 8 which is occupied by MRCB Paints and Papers which, in turn, is owned by General Paints Group. Diacon acknowledge the extent of commercial impact facing General Paints Group should the subject scheme be approved, as currently presented, and consider that the associated financial impact of reduced accessibility for MRCB Paints and Papers presents a direct knock-on effect in terms of the marketability and attractiveness of No. 10-13 Cornmarket, Dublin 8 for would-be commercial tenants.

The purpose of this letter is thus to reinforce opposition to the subject scheme, as currently proposed, and support the suggested alternative design options presented in the General Paints Group submission.

In this regard, our client considers both the extension of the replacement parking bay and the creation of a dual-purpose loading bay to represent viable alternative design options which will not compromise the primary aim of the Liffey Valley to City Centre Core Bus Corridor Scheme, that being improved accessibility to the city centre for bus/bicycle traffic, whilst ensuring the long-term protection of convenient vehicular parking which is crucial to both the commercial viability of MRCB Paints and Papers and the property value of No. 10-13 Cornmarket, Dublin 8.

In submitting this letter of support, our client asks that An Bord Pleanála duly consider the provisions of the subject submission and ensure that the subject scheme is compliant with the proper planning and sustainable development of the local area as it relates specifically to the accessibility of existing commercial units.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "KH", is written over a horizontal line.

Kevin Hughes MIPI MRTPI  
Director For HPDC Ltd.

85 Merrion Square, Dublin 2, D02 FX60  
+353 (0)1 539 0710 info@hpdc.ie www.hpdc.ie  
H.P.D.C Limited Company Number 517203