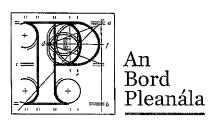
Our Case Number: ABP-317679-23

Your Reference: Amphitheatre Ireland Limited



John Spain Associates 39 Fitzwilliam Place Dublin 2 D02 ND61

Date: 03 October 2023

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 submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, 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,

Namh Thornton Executive Officer

Direct Line: 01-8737247

HA02



39 Fitzwilliam Place, Dublin 2 D02 ND61

www.jsaplanning.ie

Tel 01 662 5803 info@johnspainassociates.com

An Bord Pleanala (Strategic Infrastructure Division),

64 Marlborough Street, Dublin 1.

D01 V902

Date: 29th September 2023 Our Ref: JN BC 23135

Dear Sir/Madam,

ABP Ref.:

HA29N.317679-23

RE:

SUBMISSION TO AN BORD PLEANALA IN RESPECT OF SECTION 51(2) APPLICATION BY THE NATIONAL TRANSPORT AUTHORITY 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, Dublin we wish to make a submission on The Ringsend to City Centre Core Bus Corridor Scheme. The Ringsend to City Centre Core Bus Corridor Scheme Planning Application has been lodged with An Bord Pleanála and submissions are invited from 9th of August until Tuesday 3rd October 2023. Our client is the owner and operator of the 3Arena venue, located on North Wall Quay. The proposed route of the Bus Connects Scheme runs along North Wall Quay and interfaces with the 3Arena Venue. Our client is therefore an important stakeholder with respect to the proposed scheme.

This submission is accompanied by a technical report by Waterman Moylan which is titled Ringsend to City Centre Core Bus Corridor Scheme - Submission to An Bord Pleanala on behalf of 3Arena, North Wall Quay, Dublin 1. This submission is accompanied by a fee of €50.

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).

> Managing Director: John P. Spain Executive Directors: Paul Turley | Rory Kunz | Stephen Blair | Blaine Cregan

Senior Associate Directors: Luke Wymer | Meadhbh Nolan | Kate Kerrigan Associate Directors: Ian Livingstone | Tiarna Devlin John Spain Associates Ltd. trading as John Spain Associates. VAT No. IE 6416306U

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.

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. Further details on access and servicing are set out in the accompanying Waterman Moylan Report.

Having regard to above, it is considered important that the construction of the Bus Connects scheme does not impact upon the functionality or usability of this space that would have negative effects on the ability for deliveries and loading to take place, and would result in spillover from the segregated yard area onto the public roadway if access facilities are not maintained. The location of the 3Arena in context is shown in the following figures.

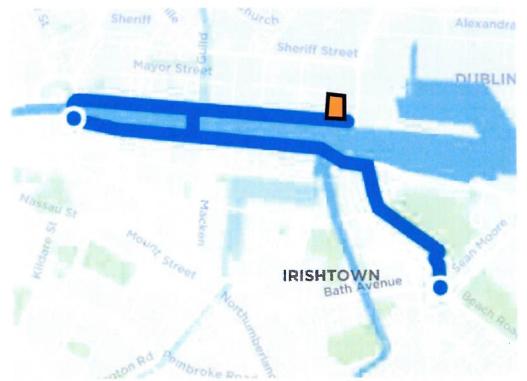


Figure 1: Location of 3Arena in Context of Proposed Scheme



Figure 2: Aerial Location of 3Arena – approximate outline in red (Google Earth)

An aerial image is shown below, noting the primary service accesses, which are set out in further detail in the Waterman Moylan Report:



Figure 3: Aerial of 3Arena – primary service access points (Google Earth)

An extract of the General Arrangement Drawings is below, showing the works immediately proximate to the 3Arena:

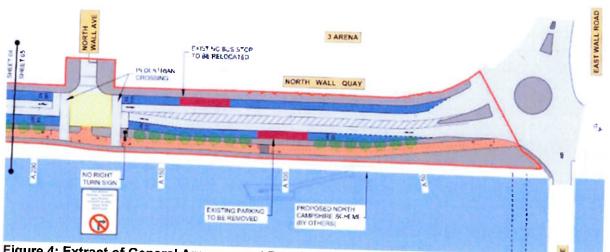


Figure 4: Extract of General Arrangement Drawings from Draft Railway Order

As set out in the Waterman Moylan Report, the full extent of impacts during construction and operation are not adequately set out or assessed, nor are arrangements for access during construction sufficiently detailed. Given the significance of the 3Arena as an operation in the Docklands area of the city and along the proposed bus corridor route, it is of considerable concern to our client that the venue does not appear to have been given adequate specific assessment and consideration in preparing the construction and traffic management plans, as noted by Waterman Moylan:

"It was noted during the preparation of this submission that the planning documentation submitted to an Bord Pleanala including the EIAR did not include any reference to the staging of events at the 3Arena or the need to maintain safe access for such events.

Nor is there any assessment of pedestrian movements generated by events at the 3Arena in Section 6.4 of the planning documentation which assess pedestrian infrastructure rather than pedestrian movements or in Section 6.4.6.3.1 which assesses people movements based on outputs from the NTA model.

These omissions are particularly significant in the case of the 150 events per year at the 3Arena where access for deliveries, collection and audiences of up to 14,000 persons is totally dependent on free movement along the surrounding streets particularly North Wall Quay."

Dublin City Development Plan 2022-2028 & North Lotts and Grand Canal Dock SDZ

Chapter 12 of the Dublin City Development Plan acknowledges the importance of the 3Arena as a cultural facility, stating that "The establishment and subsequent expansion of the Point (now 3 Arena) and the Bord Gáis Energy Theatre established new flagship venues on the north and south sides of the river bringing people into Docklands and providing night time animation", while policy CU11 of the Development Plan seeks to Support and encourage the growth of cultural facilities within Docklands. It is therefore important to ensure that the operation of the venue is not adversely impacted by the Bus Connects proposal.

The North Lotts and Grand Canal Dock SDZ acknowledges the importance of the 3Arena (then referred to as the o2) for the overall success of the docklands. Section 4.10.1.2 of the SDZ states that "The opening of the Convention Centre Dublin, the re-engineering of the Point Depot as an internal venue meeting world standards [The O2], and the construction of the new

Beckett Bridge, represent significant infrastructure that will underpin success in Docklands in the decades ahead".

The hosting of the high profile events that the 3Arena is synonymous with is also supported under Policy CR7, in stating that it is an objective "To develop the Docklands cultural tourism itinerary by expanding the range of high-profile events such as commemoration of historical events, musical or circus showcases, water-based activities and family-friendly daytime events and to promote low cost or free public events."

There is therefore a strong emphasis contained in planning policy on maintaining the operational benefits which the 3Arena provides for the Docklands and City as a whole.

Submission

As noted, the primary concerns of our client relate to ensuring that the 3Arena can continue to operate unimpeded by BusConnects. Waterman Moylan Engineers have been commissioned to assess the documentation submitted as part of the application and to ascertain where the works proposed may serve to unduly inhibit the operational abilities of the 3Arena.

The report has identified a number of particular concerns with the proposals, specifically relating to the following points (see Section 4 of the Waterman Moylan Report):

- Deficiencies in EIAR, relating to staging of events at the 3Arena
- Access to the 3Arena during the construction phase
- Effectiveness of proposed communications plan
- · Continued access where practicable
- Maintaining production deliveries
- HGV restricted zones

Following on from this, the Waterman Moylan report recommends a number of considerations which should be taken into account when deciding on the application (see Section 5 of the Waterman Moylan Report). These points are reproduced below and it is respectfully requested that An Bord Pleanala request such information and commitments from the applicant to be included as part of the application documentation or at a minimum, imposed by condition. The points are set out as they relate to operational and construction stages, or both where relevant.

Construction and Operational Stage Considerations

North Wall Avenue

"Two- way traffic shall be maintained at all times in both directions on North Wall Avenue"

HGV Restricted Zone

"Sherriff Street Upper and North Wall Avenue should both be classified as HGV Designated Routes to facilitate production deliveries between the 3Arena and Dublin Port."

Construction Stage Considerations

Scheduling of Works

"For the duration of the construction phase, Bus Connects and the appointed Contractor shall consult with the operators of the 3Arena and schedule construction works affecting the 3Arena for periods to suit the Event Diary at the 3Arena."

Working Hours

"All night works should cease at 9.00 pm in good time to facilitate the free and safe movement of departing patrons along North Wall Quay commencing from 10.00 pm after an event."

Deliveries and Waste Collection

"For the duration of the construction phase, access shall be made available on a 24/7 365 basis for delivery trucks, waste collection freighters and contractors to the front and rear of the 3Arena."

<u>Production Deliveries for Touring Shows</u>

"For the duration of the construction phase and when required by the Event Diary, access for articulated trucks to the service doors at the northwest corner of the 3Arena shall be maintained for a period extending from 48 hours before an event until 24 hours after an event.

On occasions when there may be a requirement for a longer timeframe than 48 hours before an event, access shall be provided in conjunction with the operators of the 3Arena"

Alternative Access During Construction

"For the duration of the construction phase and where an alternative access for vehicles and / or people to the 3Arena is proposed by Bus Connects and/or the Contractor, the route(s) shall be safe, suitable and of adequate capacity to cater for the traffic movements and / or crowd flows generated by the 3Arena."

Audience Arrival and Departure

"For the duration of the construction phase and when required by the Event Diary, a safe pedestrian route with clear width of not less than 3.0 metres shall be maintained for the full length of North Wall Quay and Custom House Quay from the 3Arena to the Custom House for a period commencing not less than 12 hours before an event and concluding 6 hours after the event."

Operational Stage Considerations

No Right Turn to North Wall Avenue

"After completion of the construction and during the operational phase, the exceptions to the proposed right turn ban at the junction North Wall Quay and North Wall Avenue shall be extended to include access for production deliveries to the 3Arena."

Relocation of Bus Stops

"To avoid blocking the existing service yard, the existing bus stop on the north side of North Wall Quay (7623) and the proposed bus stop at the existing car parking on the south side of North Wall Quay shall both be relocated so as not to interfere with the operation of the service yard at the front of the 3Arena."

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. The 3Arena can host up to 14,000 fans in its Amphitheatre style auditorium. Our client is concerned due to an apparent lack of consideration regarding the operational

needs of the 3Arena. As previously emphasised, high capacity events with large crowds are a regular occurrence at the 3Arena, often with multiple events taking place each week.

Furthermore, any proposals which will inhibit access and servicing arrangements for delivery trucks and vans will jeopardise the ability for performances to be held with adverse impacts on traffic movements in the area, including bus services. To this effect, it is essential that access in both directions for trucks along North Wall Avenue is maintained, and that the current bus stops at the entrance to the service yard at North Wall Quay are relocated to aid pedestrian safety.

In addition, provisions for audience arrival and departures are sought to be provided to ensure safe and efficient access and egress of patrons.

It is therefore respectfully submitted that the application is required to provide more details toward access and impacts during the construction and operational phases, and to provide assurances that the operations of the 3Arena will not be impacted during the construction phase.

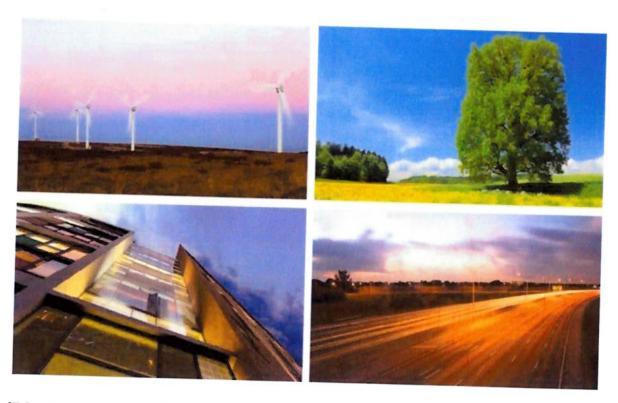
Please acknowledge receipt of this submission.

Yours sincerely,

John Spain Associates

APPENDIX 1: Waterman Moylan Submission Document					





Ringsend to City Centre Core Bus Corridor Scheme

Submission to An Bord Pleanala on behalf of 3Arena, North Wall Quay, Dublin 1 (ABP Ref: KA29N.317735).

September 2023

Waterman Moylan Consulting Engineers Limited

Block S. Eastpoint Business Park, Alfie Byrne Road, Dublin D03 H3F4 www.waterman-moylan.ie



Client Name:

Amphitheatre Ireland Limited

Document Reference:

14-024r.012

Project Number:

14-024

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015)

Issue

Date

Prepared by

Checked by

Approved by

Issue 1

28 Sept 2023

B McCann

J Gibbons

J Gibbons

Comments



Disclaimer

This report has been prepared by Waterman Moylan, with all reasonable skill, care and diligence within the terms of the Contract with the Client, incorporation of our General Terms and Conditions of Business and taking account of the resources devoted to us by agreement with the Client.

We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above

This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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1. Introduction

1.1 Introduction

This submission has been prepared by Waterman Moylan on behalf of Amphitheatre Ireland Ltd in response to an application by Bus Connects to An Bord Pleanala on 3rd August 2023 for a proposed road development consisting of the Ringsend to City Centre Core Bus Corridor Scheme (ABP Ref: KA29N.317735).

The primary purpose of this submission is to ensure that the routes to and from the 3Arena for the audience, servicing and production deliveries are not affected during the construction and operational phases of the Ringsend to City Centre Core Bus Corridor Scheme.

1.2 Location

The 3Arena is located on the north bank of the River Liffey in Dublin 1 at the eastern end of North Wall Quay adjacent to the junction with East Wall Road and the Tom Clarke East Link Bridge.

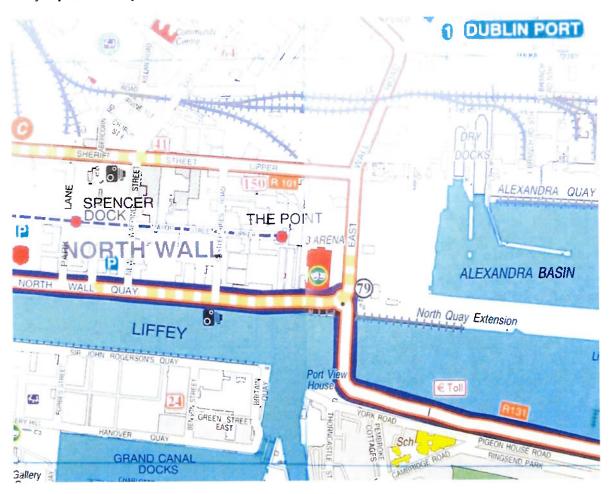


Figure 1:Location Map

1.3 3Arena

The 3Arena is a multi-purpose entertainment venue located on North Wall Quay. It was originally developed in 1988 as the Point Depot from a redundant railway warehouse constructed by the Great Southern and Western Railway in 1878.

In 2007, the Point Depot closed and was totally reconstructed on a smaller site without a car park.It reopened as The 02 in December 2008.

The reconstructed venue hosts up to 150 events each year and has a capacity of up to 14,000 persons for concerts and musical shows.

The lands previously occupied by the car park at the Point Depot have since been redeveloped as a District Centre known as the Point Village.

There is no car parking for patrons at the 3Arena. Since December 2009, the adjoining Point Square has been the eastern terminus of the LUAS Red Line.

The audience movements, servicing and production deliveries at the 3Arena are described later in this submission.



Figure 2 Frontage of 3Arena on North Wall Quay

2. Ringsend to City Centre Core Bus Corridor Scheme

2.1 Description - Section 1c

The eastern end of North Wall Quay is located in Section 1c of the Proposed Scheme. Section 1c encompasses a length of approximately 920m along the North Wall Quay between the Samuel Beckett Bridge and the Tom Clarke East Link Bridge. See Figure 3.

The construction activities at Section 1c for the Proposed Scheme will comprise pavement reconstruction, widening, and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction activities will also consist of additional signage, new road markings, new and amended traffic signal infrastructure, new street furniture.

The Scherzer Bridges at the Royal Canal will be deconstructed, relocated and reinstated, with both Scherzer Bridges at this location restored for occasional opening. The pedestrian and cycle bridges adjacent to the Scherzer Bridges will be removed, and a new replacement carriageway bridge will be constructed.

Trees will be removed along Section 1c. However new trees are proposed to replace them as part of the Proposed Scheme. Some minor utility diversions and / or protections will be required. No new drainage works are proposed at this section of the Proposed Scheme.

The expected construction duration will be approximately 24 months. See figure 4.

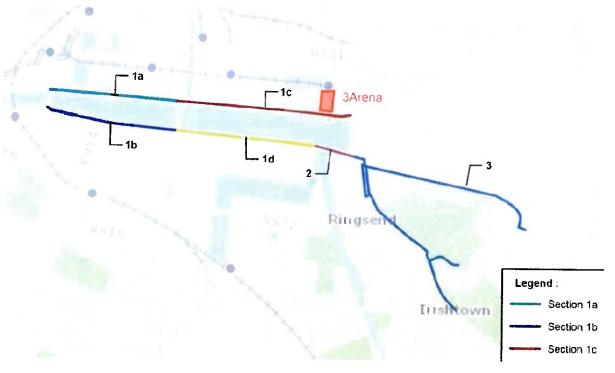


Figure 3 Locations of Sections (Extract from Bus Connects Figure 5.1)

Section No.	Approximate Construction Duration	Approximate Length (m)	Year 1				Year 2				Year 3	
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
Section 1a	24 months	640										
Section 1b	9 months	780										+-
Section 1c	24 months	920										+
Section 1d	12 months	680										+
Section 2	30 months	Structure										
Section 3	12 months	1,000										

Figure 4 Construction Program

(Extract from Bus Connects Table 5.2)

2.2 Traffic Management

Prior to commencing the construction works, temporary traffic management measures will be installed. The temporary traffic management measures will include lane closures, road closures and diversions.

When roads and streets are being upgraded, there will be some temporary disruption / alterations access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to businesses affected by the works, at all times, where practicable.

Details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

Where footpaths are affected by construction, a safe route will be provided past the works area, and where practicable, provisions for matching existing facilities for pedestrians will be made.

2.3 Road Closures and Diversions - Section 1c

During the Construction Phase at Section 1c, works will be carried out in short sections along the north quays. The works will be carried out on one side of the carriageway, with traffic reduced to a single lane in each direction and realigned to the other side of the carriageway.

General traffic inbound to the City Centre will be diverted from East Wall Road onto Sheriff Street Upper (Section 1c), and along Seville Place, and Amiens Street (Section 1a), to facilitate public transport priority inbound, along the north quays, as shown in Figure 5.

While this diversion will be used by general traffic inbound, a 7.5t weight restriction on the western end of Sheriff Street (between Abercom Road and Guild Street) will restrict Heavy Goods Vehicle (HGV) use of the diversion. Instead, HGVs will use the various other designated HGV routes, as permitted, to reach their destination.

2.4 Traffic Management

Prior to commencing the construction works, temporary traffic management measures will be installed. The temporary traffic management measures will include lane closures, road closures and diversions.

When roads and streets are being upgraded, there will be some temporary disruption / alterations access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to businesses affected by the works, at all times, where practicable.

Details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

Where footpaths are affected by construction, a safe route will be provided past the works area, and where practicable, provisions for matching existing facilities for pedestrians will be made.

Further information on the HGV weight limit and designated HGV routes is provided in Chapter 6 (Traffic & Transport) of this EIAR. General traffic inbound will continue to be diverted along Amiens Street in Section 1c. General traffic and public transport traffic outbound from the City Centre will be reduced to a shared single lane along the north quays.

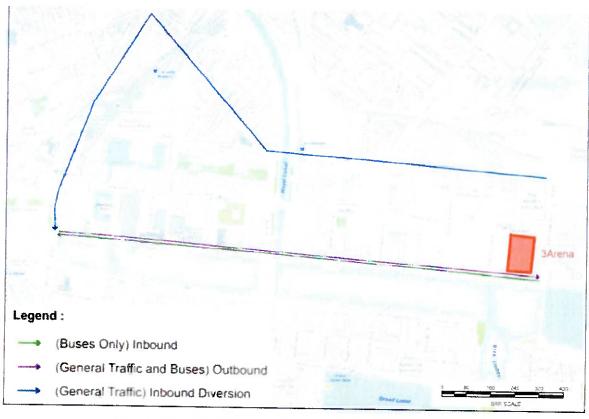


Figure 5 Traffic Management Diversion Section 1a and Section 1c (Extract from Bus Connects Figure 5.8)

2.5 Works at 3Arena

The works in the area of the 3Arena are shown on Figure 6 and will include:-

- Reconstruction of the existing North Wall Quay / North Wall Avenue junction into a 3-arm signal junction with no right turn for westbound traffic from North Wall Quay into North Wall Avenue except for buses, taxis and cycles.
- Relocation of existing bus stop 7623 in front of the 3Arena to a new location.
- New kerbs and resurfacing of the roads, footpaths, and cycle tracks.
- Retention of the existing roundabout at junction North Wall Quay and East Wall Road pending change by Dublin City Council to a signal junction in a separate scheme.

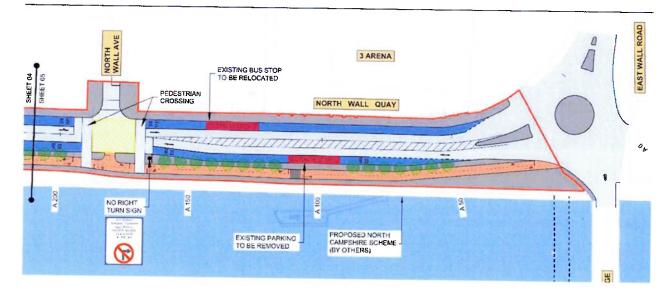


Figure 6 Proposed Layout at 3 Arena

(Extract from Bus Connects General Arrangement Drawing Sheet 5

2.6 Working Hours

The envisaged working hours for the Proposed Scheme in Section 5.10.3 of the planning documentation are 07.00 - 23.00 weekdays and 08.00 - 16.30 on Saturdays. Nighttime and Sunday working is also envisaged for works that cannot be undertaken during the day.

The vast bulk of shows at the 3Arena finish between 10.30 and 11.00 pm after which up to 14,000 persons exit the building in a relatively short period.

Construction works in the late evening up to 23.00 could seriously interfere with the safety of the large number of patrons using North Wall Quay to access the City Centre after an event.

2.7 Mitigation Measures

The mitigation measures proposed in the planning documentation submitted to An Bord Pleanala include a Construction Environmental management Plan (CEMP) whose purpose is to set out the management framework for the delivery of the proposed construction works.

The CEMP includes a Construction Traffic Management Plan (CTMP). The purpose of the CTMP is to demonstrate that the residual, impacts of the construction phase can be minimised and that the transport related activities can be carried out with minimum disruption to other road users. The CTMP was also prepared for the purpose of identifying feasible, appropriate and safe methods of access for construction traffic to the Proposed Scheme.

The mitigation measures include a Communications Plan between local stakeholders and the contract team during the works.

2.8 Construction Environmental Management Plan (CEMP)

Extracts from the CEMP are reproduced below:-

5.1.6 Communications

The procedures adopted for internal and external communication of information regarding the specific elements of the Proposed Scheme will be agreed between the NTA and the appointed contractor prior to construction as set out in the Construction Contract.

The appointed contractor will put in place a Communications Plan in accordance with the Employer's Requirements. The Communications Plan will provide a mechanism for members of the public to communicate with the NTA and the appointed contractor, and for the NTA and the appointed contractor to communicate important information on various aspects of the Proposed Scheme to the public.

The Communications Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such as boundary works, road closures and diversions, and any mitigating actions that are being taken to minimise such disruption.

2.9 Construction Traffic Management Plan (CTMP)

Extracts from the CTMP in relation to traffic management, access and pedestrians are reproduced below.

Table 5.4 Traffic Management Provisions of the CTMP

		participation for a roug entire posses of mine.
Section 1c	24 months	 Works will be managed in short sections to minimise disruption. One lane of traffic will be maintained in each direction with phased lane closures in place as required; General traffic inbound to the City Centre will be diverted from East Wall Road, along Sheriff Street Upper, onto Seville Place and Amiens Street to facilitate inbound public transport priority; General traffic and public transport traffic outbound from the City Centre will be reduced to a shared single lane; and During works at the new and relocated bridges at the Royal Canal, traffic will be reduced to a single lane shuttle, controlled by a stop / go system of temporary traffic lights for a period of up to 10 months on either side of the carriageway (20 months in total).

5.2.3.1 Access and Egress

The appointed contractor shall provide advanced warning signs, in accordance with the Traffic Signs Manual (DTTAS 2019a), on approach to the proposed access locations, and entry and exit points throughout the live working area.

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.

5.2.3.4 Pedestrian and Cyclist Provisions

The measures set out in Section 8.2.8 of the Traffic Signs Manual (DTTAS 2019a) will be implemented, wherever practicable, to ensure the safety of all road users, in particular pedestrians (including able-bodied pedestrians, wheel-chair users, mobility impaired pedestrians, pushchair users) and cyclists. Therefore, where footpaths or cycle tracks are affected by construction, a safe route will be provided past the work area, and where practicable, provisions for matching existing facilities for pedestrians and cyclists will be made.

5.2.3.6 Parking and Access

When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme.

Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times.

The CTMP has been prepared to demonstrate the manner in which the interface between the public and construction-related traffic will be managed and how vehicular movement will be controlled. It will be a condition of the Employer's Requirements that the successful appointed contractor, immediately following appointment, must detail in the CTMP the manner in which it is intended to effectively implement all the applicable mitigation measures identified in this EIAR and any additional measures required pursuant to conditions imposed by An Bord Pleanála, should they grant approval.

2.10 Contractor Input

The appointed contractor will be obliged to prepare a comprehensive Construction Traffic Management Plan (CTMP).

In preparing the CTMP for the proposed works, the appointed contractor will be required to give consideration where practicable to facilitate and identify opportunities for the maximum movement of people during the construction period through implementing the following hierarchy of transport mode users:

- · Pedestrians.
- · Cyclists.
- · Public Transport.
- General Traffic.

The planning documents make no mention of the 14,000 persons travelling to or from shows and events at the 3Arena.

Access will however be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase.

3. Operations at 3Arena

3.1 Types of Events

The events hosted at the 3Arena include any or all of the five generic categories set out below:

- · Assembly Political Conventions, Religious Gatherings and Seminars.
- Concerts Classic, Folk, Popular and Rock.
- Display Exhibitions, Fashion Shows, Product Launches and Gala Dinners.
- Sports Badminton, Basketball, Boxing, Darts, Football, Ice Hockey, Ice Skating, Martial Arts, Tennis and Wrestling.
- Theatre Ballet, Circus, Dance, Drama, Musical and Opera.

3.2 Delivery, Collection and Servicing Facilities

The 3 Arena includes dedicated loading and servicing areas both within and on the west side of the venue. These facilities comprise:

- Access doors to the six-bay service area / scene dock with access doors onto the Point Square.
 - Access to these areas is from the eastern end of Mayor Street. Departure from the service area is back along a Mayor Street with a hammerhead type turning area in Point Square.
- Internal storage areas at the rear and sides of the stage accessed from the service road along the western side of the building.
 - Departure from this one-way service road is onto North Wall Quay.
- Service yard at the front of the building accessed from North Wall Quay.

The access to this yard is blocked on a daily basis by the operation of the two bus stops on North wall Quay in front of the venue. particularly around evening rush hour when artistes are trying to access the building via this route.

The operators of 3Arena have never been consulted about the location of these bus stops prior to their installation, a major oversight on behalf of the public transport authorities.

3.3 Food, Beverage and Merchandising Deliveries

Food, beverage and merchandising deliveries are delivered by a variety of vehicles at a variety of times.

Waste is also collected by a variety of vehicles at a variety of times.

These deliveries and collections are generally on a different timescale to the production deliveries described below.

3.4 Production Deliveries for Touring Shows

Production deliveries to the 3Arena for touring shows can comprise a variable number of vehicles ranging from one to forty depending on the event. Most but not all of the vehicles are 16 metre long articulated pantechnicons which mostly originate outside the island of Ireland and access the 3Arena from Dublin Port.

The locations of the access, service areas, turning area and egress are illustrated on Figure 7. The service area has a standing capacity for up to 6 x 16 metre articulated vehicles and the one-way service road has a nose to tail capacity for a further three such vehicles.

In the event that the production convoy exceeds the capacity of the service area and service road during a get-in, the unloaded incoming vehicles are held off-site at a suitable location in the adjacent docklands area and called up by radio as space becomes available. The location of the off-site holding area can vary and delivery vehicles do not generally stand on the surrounding streets.

Empty production vehicles waiting to load after an event will be held off site also in the same area until the audience have cleared the service road and then called by radio in sequence for loading.

The Event Safety Management Plan sets out the detailed operational arrangements for the service area and service road. Generally, no production vehicles access the service area, turning area or service road for a minimum period of 20 minutes after the conclusion of an event so as to facilitate the dispersal of departing audiences.

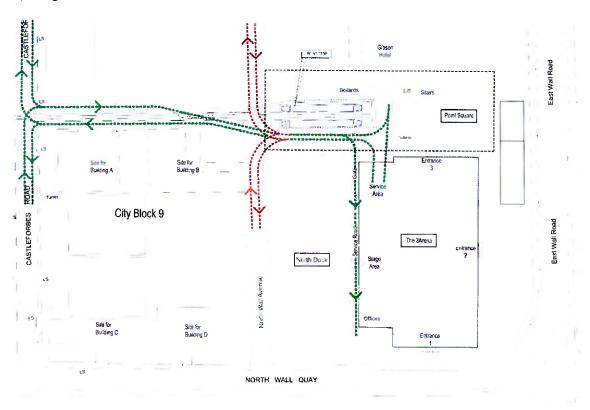


Figure 7 Production Delivery Routes

3.5 Audience Arrivals

The entry arrangements for audiences up to 14,000 persons to the 3Arena are entrance specific and issued with an individual bar code requiring the holder to enter through the specified doors at Entrance 1, 2 or 3.

Mayor Street (1,955 persons), Point Square (8,415 persons) and the area between the venue and East Wall Road (6,736 persons) all play vital roles in the entry arrangements for the venue.

3.6 Queuing Before Events

Temporary crowd barriers are provided on the north and / or east side of the venue when required to create holding areas for queueing patrons until the doors open.

This procedure is implemented by a team of stewards as required for particular events.

3.7 Audience Entry

The 3Arena has three pedestrian entrances to cater for the capacity audience of 14,000 persons:

Entrance 1: North Wall Quay 4,000 persons
 Entrance 2: East Wall Road 6,000 persons
 Entrance 3: Point Square 4,000 persons

■ Total 14,000 persons

In general, people attending events at the 3Arena enter and leave by the same route but in a shorter more concentrated period.

3.8 Audience Departures

The departure arrangements for an audience of 14,000 persons from the 3Arena are Mayor Street (1,955 persons), Point Square (8,415 persons) and the area between the venue and East Wall Road (6,736 persons) all play vital roles in the egress arrangements for the venue.

The routes and areas occupied by departing patrons are illustrated on Figures 8 and 9.

For public safety, it is essential that these areas are maintained free from obstruction at the appropriate times for the ongoing safe departure of patrons from the 3Arena.

3.9 Emergency Routes

The emergency exit routes and the routes for emergency services to the venue are illustrated on Figure 10.

For public safety, it is essential that these routes are maintained free from obstruction at all times both before and after events if the venue is to continue to operate safely.

The layout of the 3Arena provides for fire tender access around the full perimeter of the venue. A comprehensive access arrangement which must be maintained clear before, during and after events is part of the Fire Certificate issued by Dublin City Council for the venue.

3.10 Getting to The 3Arena

For a number of years, a Transport Guide prepared by the operators of the 3Arena was available to the patrons of the venue. The Guide provided information for patrons on travelling to and from the venue.

The emphasis in the Transport Guide was on the use of public transport for travel to the venue having regard to the restricted availability of car parking in the surrounding area. In addition to the strong promotion of public transport, the emphasis was on reducing and managing the volume of car traffic to the venue.

Patrons booking tickets for the 3Arena are now advised that:-

Traveling to 3Arena couldn't be easier. We are situated in the heart of Dublin's docklands which is very well served by public transport including Bus, Rail and Dart services, all of which will leave you within no more than a 20-minute walk of the venue.

We encourage you to use public transport when attending any of our shows, not only to reduce traffic congestion in the area but also to reduce the number of cars on our roads as we all do our bit to live a more carbon-friendly and sustainable life.

You can travel to our doorstep via the Luas Red Line and you can switch from the Green line in the city centre if you are traveling from a different direction. There are extra trams on show nights to cater for the large numbers travelling to and from the 3Arena. A full schedule and live information are available on www.luas.ie.

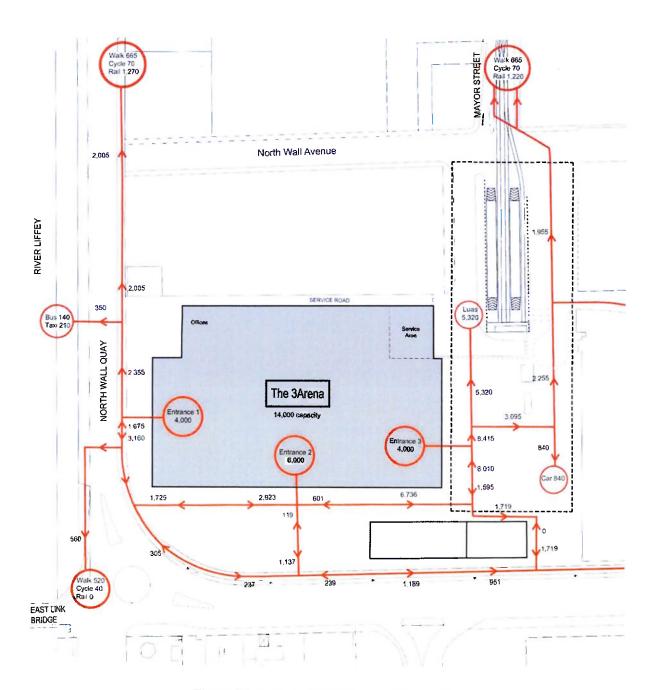


Figure 8 Audience Departure - Exit Flow Routes

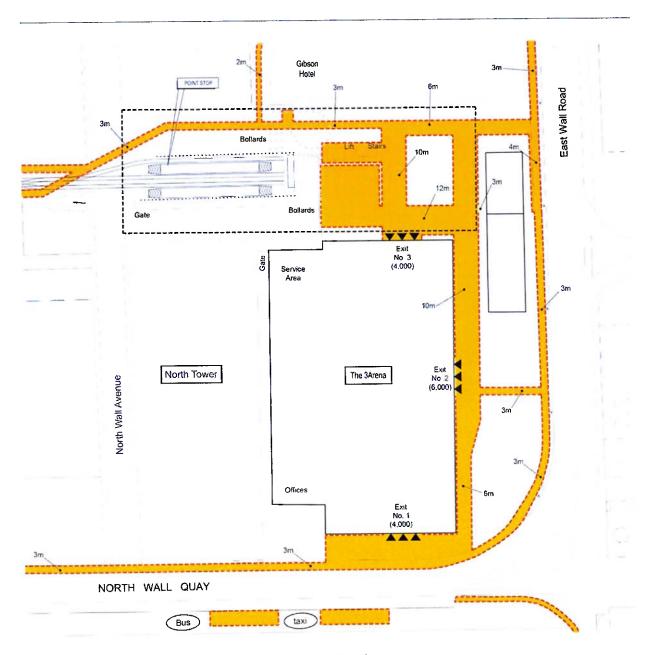


Figure 9 Exit Flow Areas

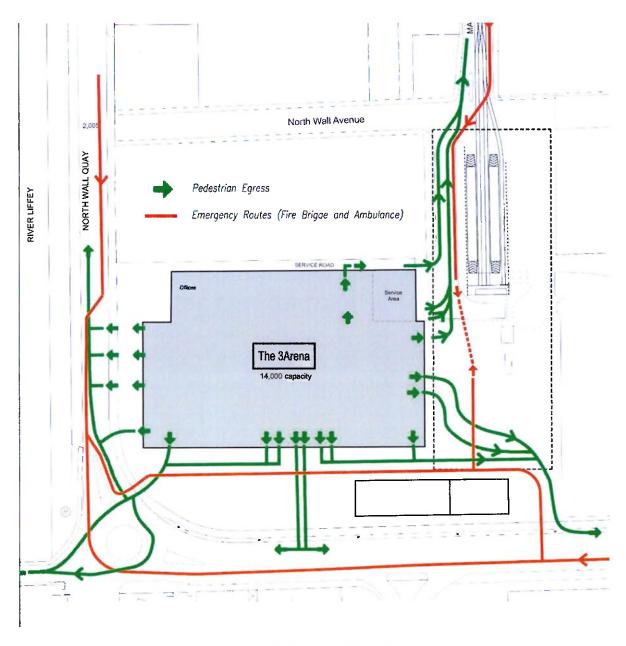


Figure 10 Emergency Routes

4. Particular Concerns

4.1 Deficiencies in EIAR

It was noted during the preparation of this submission that the planning documentation submitted to an Bord Pleanala including the EIAR did not include any reference to the staging of events at the 3Arena or the need to maintain safe access for such events.

Nor is there any assessment of pedestrian movements generated by events at the 3Arena in Section 6.4 of the planning documentation which assess pedestrian infrastructure rather than pedestrian movements or in Section 6.4.6.3.1 which assesses people movements based on outputs from the NTA model.

These omissions are particularly significant in the case of the 150 events per year at the 3Arena where access for deliveries, collection and audiences of up to 14,000 persons is totally dependent on free movement along the surrounding streets particularly North Wall Quay.

4.2 Access During Construction Phase

Of particular operation concern to the operators of the 3Arena is the potentially disruptive construction phase of the Ringsend to City Centre Core Bus Corridor.

For the venue to continue to operate safely, it is essential that the access routes, delivery routes and emergency routes around the venue remain clear and open with adequate capacity to cater for the vehicular and pedestrian numbers generated by the venue.

4.3 Working Hours

The vast bulk of shows at the 3Arena finish between 10.30 and 11.00 pm after which up to 14,000 persons exit the building in a relatively short period.

Construction works in the late evening up to 11 pm could seriously interfere with the safety of the large number of patrons who walk along North Wall Quay to access the City Centre after an event.

To mitigate against this, all night works on the Proposed Scheme should cease in good time to facilitate the free and safe movement of departing patrons along North Wall Quay.

4.4 Hours of Communications Plan

While the Communications Plan will include procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their property such road closures and diversions, there is no commitment to maintain access other than advising what mitigating actions are being taken to minimise such disruption.

4.5 Continued Access Where Practicable

Notwithstanding any conditions that may be imposed by An Bord Pleanala, the day-to-day management of access during the construction phase will fall on the appointed Contractor who is not party to the planning process.

On the basis of the documentation submitted to An Bord Pleanala by Bus Connects, the Contractor will not be required to maintain access to business premises at all times but only where practicable.

4.6 Production Deliveries

Proposals to restrict the existing right turn from North Wall Way into North Wall Avenue to buses, taxis and cyclists will sever the primary route for production related traffic between the 3Arena and Dublin Port.

Production deliveries are a vital and essential part of the operation of The 3Arena. They comprise ten to forty articulated trucks arriving between 6am and 1pm and departing between 11pm and 5am after the event.

The existing delivery route is from North Wall Quay, North Wall Avenue and Mayor Street Upper to the service doors at the northwest corner of the venue. This route can be isolated from audience movements, both before and after events.

It is essential to the operation of the 3Arena that this delivery route be kept open for all productions that require deliveries from Dublin Port or elsewhere on the island of Ireland.

4.7 HGV Restricted Zone

The existing HGV Restricted Zone is shown in Figure 11. From Figure 11, it will be seen that the only designated HGV Route between Dublin Port and the 3Arena is via East Wall Road, North Wall Quay and North Wall Avenue.

If this route is severed during the Operational Stage by the introduction of a no right turn from North Wall Quay to North Wall Avenue, it will no longer be possible to effect production deliveries to the 3Arena as the only alternative route via Sherriff Street Upper to North wall Avenue is not a designated HGV Route.



Figure 11 HGV Restricted Zone (Extract from Bus Connects Diagram 6.7)

5. Submission

5.1 Introduction

If the 3Arena is to continue to operate safely during the construction stage of the Ringsend to City Centre Core Bus Corridor Scheme, it is essential that access be maintained for events at the 3Arena.

In the absence of any safeguards in the planning documentation, An Bord Pleanala is requested to impose conditions relating to continued access to the 3Arena in any approval that may be granted to Bus Connects.

Subject to the approval of An Bord Pleanala, drafts of conditions are set out below.

5.2 Scheduling of Works

For the duration of the construction phase, Bus Connects and the appointed Contractor shall consult with the operators of the 3Arena and schedule construction works affecting access to the 3Arena for periods to suit the Event Diary at the 3Arena.

5.3 Working Hours

All night works should cease at 9.00 pm in good time to facilitate the free and safe movement of departing patrons along North Wall Quay commencing from 10.00 pm after an event.

5.4 Deliveries and Waste Collection

For the duration of the construction phase, access shall be made available on a 24/7 365 basis for delivery trucks, waste collection freighters and contractors to the front and rear of the 3Arena.

5.5 Production Deliveries for Touring Shows

For the duration of the construction phase and when required by the Event Diary, access for articulated trucks to the service doors at the northwest corner of the 3Arena shall be maintained for a period extending from 48 hours before an event until 24 hours after an event.

On occasions when there may be a requirement for a longer timeframe than 48 hours before an event., access shall be provided in conjunction with the operators of the 3Arena.

5.6 Audience Arrival and Departure

For the duration of the construction phase and when required by the Event Diary, a safe pedestrian route with clear width of not less than 3.0 metres shall be maintained for the full length of North Wall Quay and Custom House Quay from the 3Arena to the Custom House for a period commencing not less than 12 hours before an event and concluding 6 hours after the event.

5.7 No Right Turn to North Wall Avenue

After completion of the construction and during the operational phase, the exceptions to the proposed right turn ban at the junction North Wall Quay and North Wall Avenue shall be extended to include access for production deliveries to the 3Arena.

5.8 North Wall Avenue

Two- way traffic shall be maintained at all times in both directions on North Wall Avenue

5.9 HGV Restricted Zone

Sherriff Street Upper and North Wall Avenue should both be classified as HGV Designated Routes to facilitate production deliveries between the 3Arena and Dublin Port.

5.10 Relocation of Bus Stops

To avoid blocking the existing service yard, the existing bus stop on the north side of North Wall Quay (7623) and the proposed bus stop at the existing car parking on the south side of North Wall Quay shall both be relocated so as not to interfere with the operation of the service yard at the front of the 3Arena.

5.11 Alternative Access During Construction

For the duration of the construction phase and where an alternative access for vehicles and / or people to the 3Arena is proposed by Bus Connects and/or the Contractor, the route(s) shall be safe, suitable and of adequate capacity to cater for the traffic movements and / or crowd flows generated by the 3Arena.

UK and Ireland Office Locations

