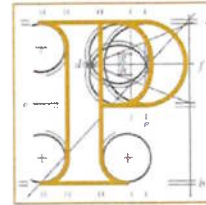


Our Case Number: ABP-317679-23

Your Reference: Custom House Docks Management Ltd



**An
Bord
Pleanála**

Tom Phillips & Associates
80 Harcourt Street
Dublin 2
D02 F449

Date: 04 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 in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

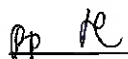
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

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,



Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

Teil
Glaio Áitiúil
Facs
Láithreán Gréasáin
Riomphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
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: Tuesday 3 October 2023 13:25
To: sine@tpa.ie
Subject: RE: Submission - ABP Refs. HA29N.317679 & KA29N.317735

A Chara,

We acknowledge receipt of your email; official acknowledgement of your submission will issue in due course.

Kind Regards,

Lauren Griffin

From: Sine Kelly <sine@tpa.ie>
Sent: Friday, September 29, 2023 2:44 PM
To: LAPS <laps@pleanala.ie>
Cc: Casey, Raymond (Apleona Ireland Ltd.) <ray.casey@apleona.com>; Smith, John Paul (Apleona Ireland Ltd.) <john-paul.smith@apleona.com>
Subject: Submission - ABP Refs. HA29N.317679 & KA29N.317735

To whom it concerns

Please find attached a submission in respect of an Application for a proposed road development for the Ringsend to City Centre Core Bus Corridor Scheme (ABP Reference HA29N.317679) and associated Compulsory Purchase Order (ABP Reference KA29N.317735) being made on behalf of our Clients Custom House Docks Management Ltd and Custom House Docks Basement Management Ltd.

This submission is not accompanied by a fee on the basis that our Clients' land is proposed to be acquired under the CPO under Plot Lists 1003(1).1c, 1003(2).1g, 1003(3).1z, 1003(4).2c and 1003(5).2z (as confirmed by An Bord Pleanála).

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

Kind regards

Síne

Síne Kelly
Associate



Contact

80 Harcourt Street
Dublin 2
D02 F449
T +353 1 478 6055
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Mob.: 087 274 0125

w www.tpa.ie
e info@tpa.ie



Tom Phillips and Associates Limited:

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An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Friday, 29th September 2023
[By email laps@pleanala.ie]

Dear Sir / Madam

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

Application ABP Reference HA29N.317679

CPO ABP Reference KA29N.317735

- 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, in association with NRB Consulting Engineers, to prepare this submission.

This submission is two-fold and is in respect of:

1. An application, made by the National Transport Authority (NTA), for a proposed road development for the Ringsend to City Centre Core Bus Corridor Scheme ('Proposed Bus Corridor Scheme') pursuant to section 51(3)(a) of the *Roads Act, 1993* (as amended) (ABP Reference HA29N.317679); and
2. The Compulsory Purchase Order notice served by the NTA in respect of lands associated with the aforementioned application associated with the Ringsend to City Centre Core Bus Corridor Scheme (ABP Reference KA29N.317735).

This submission is not accompanied by a fee on the basis that our Clients' land is proposed to be acquired under the CPO (as confirmed by An Bord Pleanála) under Plot Lists 1003(1).1c, 1003(2).1g, 1003(3).1z, 1003(4).2c and 1003(5).2z as described in Section 2.0 below.

In accordance with statutory public notice, this submission has been made to An Bord Pleanála before 5.30pm on 3rd October 2023. For information purposes, we enclose the public notice as Appendix A.

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.

TOWN PLANNING CONSULTANTS



Custom House Docks Management Ltd is in the control of common areas around the IFSC in Custom House Docks and George's Dock in Dublin 1, including open spaces, roadways and accesses / egresses to and from these roadways. Figure 1.1 illustrates the areas in the control of Custom House Docks Management Ltd.

Custom House Docks Basement Management Ltd is in the control of the basement (which includes car parking) beneath IFSC House, International House and La Touche House. This basement is accessed via Custom House Quay, illustrated on Figure 1.2 below.

Our Clients' lands serve a significant number of businesses in the IFSC, accommodating several key and high-profile entities including:

- International Underwriting & Investment (IIU);
- Susquehanna International Group (SIG);
- EPIC & CHQ Building, which includes the following tenants:
 - EPIC The Irish Emigration Museum – 400,000 visitors per year;
 - EPIC Museum gift shop;
 - Irish Family History centre;
 - Flyfit Gym
 - Urban Brewing
 - Ely Restaurant
 - Dogpatch Labs (Ireland's largest and premier startup hub)
 - The NDRC (Government accelerator)
 - HBAN – Halo Business Angel Network
 - Starbucks Coffee
 - Mitchells Off licence
 - Freshii
 - Seven Wonders
 - Bakehouse
 - Toss'd Noodles
 - During 2024 and 2025, two major developments will be progressed: (i) a major food hall and market of over 2,000 sq m will be built in the CHQ Building, (ii) EPIC Museum will be building and launching of an expanded event, exhibition and gala dinner space over 1,400 sq m in partnership with Failte Ireland;
- Trinity College (Stack B Campus);
- KPMG;
- Bank of Montreal;
- Wells Fargo;
- Intessa Sanpaolo;
- Crowley Millar Solicitors;



- McKeever Rowan Solicitors;
- Walkers Global Law Firm;
- Roberts Nathans;
- Citi Bank;
- The Spencer Hotel;
- The Hilton Garden Hotel;
- The Charities Regulator; and
- The Insurance Institute.

There are upwards of 2,000 office workers employed in the estate.

This submission relates to the common areas around the Custom House Docks in Dublin 1, including open spaces, pedestrian walkways and accesses / egresses, roadways and vehicular accesses / egresses to and from these routes and also car park areas, including basement car parks, that will be affected (and by default, the tenants listed above that will also be affected as a result) by the CPO and detailed proposal relating to the Proposed Bus Corridor Scheme.

Portions of our Client's lands are also being temporarily and permanently acquired through a CPO process for the purposes of constructing and operating the Bus Connects scheme.

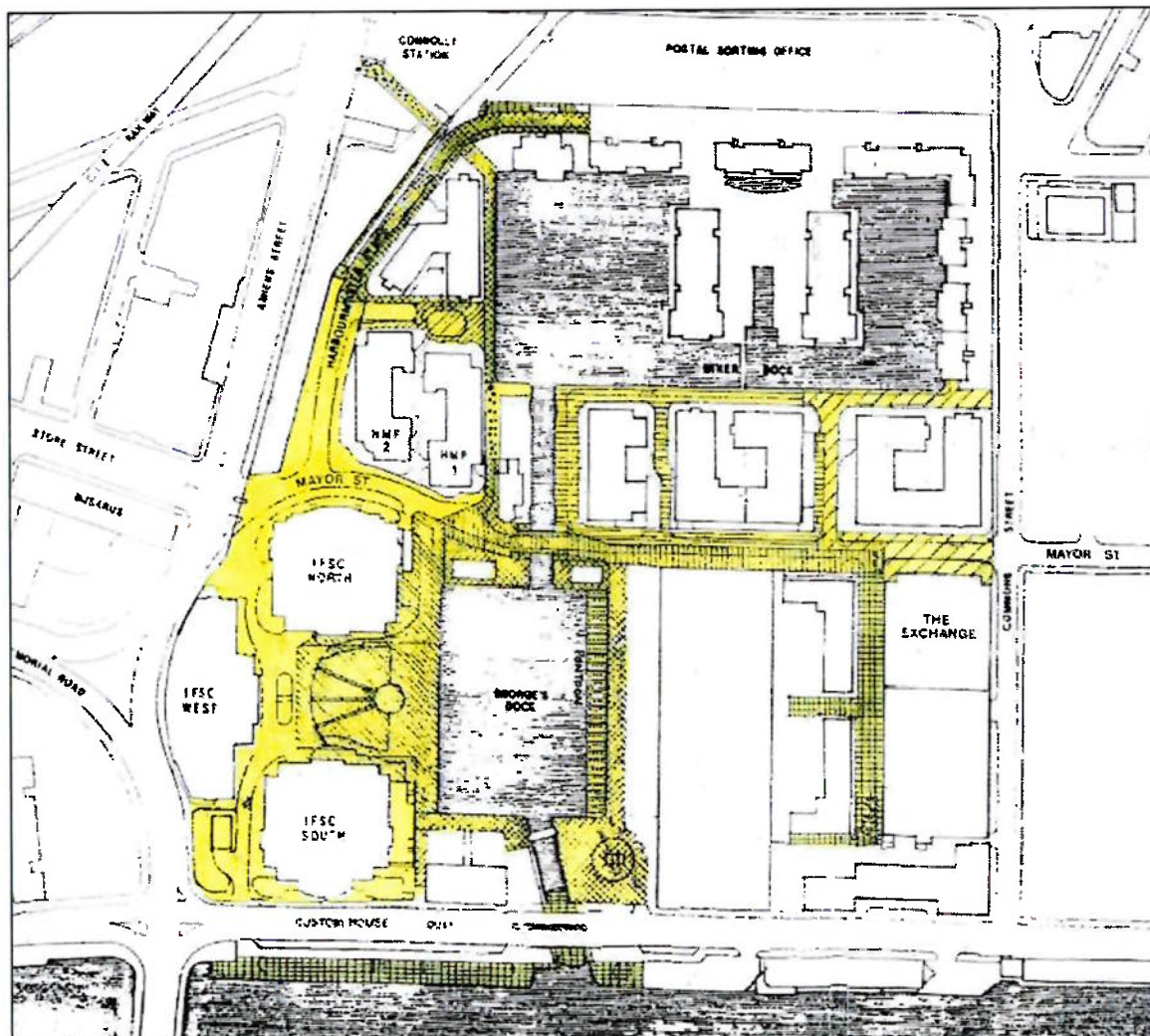


Figure 1.1: The lands coloured yellow is the area of land under the control of the Custom House Docks Management Ltd, extracted from a conveyance map. Some of these routeways lead into car park areas (including basement level car parks) that are in the control of Custom House Docks Basement Management Ltd.

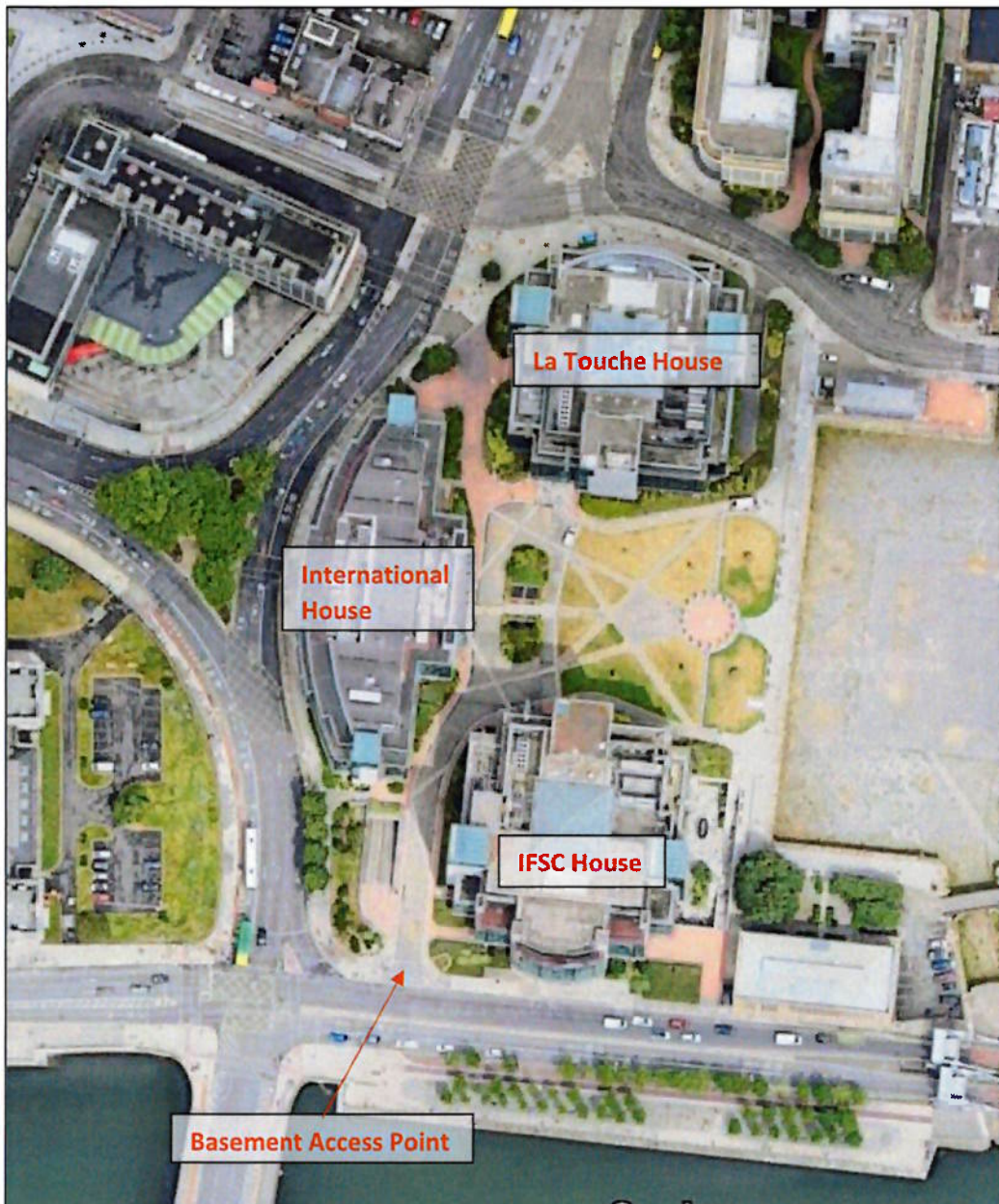


Figure 1.2: The location of the properties that are serviced with basements (including car parking) that are in the control of Custom House Docks Basement Management Ltd, extracted from Google Earth.

From the outset, we highlight our Clients' support for the Ringsend to City Centre Core Bus Connects project having regard to the proposed enhanced bus priority measures and the improvements to pedestrian and cyclist infrastructure. Our Clients further acknowledges that the Proposed Bus Corridor Scheme will alleviate traffic congestion in and around the area.

However, our Clients are concerned that the successful operation of the accesses / egresses to and from the parking areas in Custom House Dock area of the IFSC is safeguarded during the Board's assessment of the application, as well as during the construction and operation stages of the project.



1.1 The Subject Site and the Proposals

1.1.1 Bus Corridor Scheme Application

Our Clients are in the control of common areas in the Custom House Dock area in the IFSC. These areas include open spaces, roadways and accesses / egresses to and from these routes and also car park areas, including basement car parks and are indicated on the yellow marked areas in Figure 1.1 below.

The lands affected by the Ringsend to City Centre Core Bus Connects Scheme are primarily located in the roadways leading on and off of Custom House Quay, with the associated CPO affecting lands directly west of the CHQ Building, north of the Scherzer Bridge.

Access to the site's car parking areas (including basements) is via a variety of roadways leading on and off of Custom House Quay. The changes proposed to these are a cause of concern to our Clients.

1.2 Compulsory Purchase Order (CPO)

The NTA served a 'Notice of Compulsory Purchase' on the landowner on 3rd August 2023, regarding the acquisition of land at Custom House Docks to facilitate the construction of the Proposed Bus Corridor Scheme in Dublin City.



2.0 HOW THE LANDS ARE AFFECTED BY THE CPO

This section provides an overview of how the lands are affected by the proposed CPO on a permanent and temporary basis and our Clients' observations in relation to same.

2.1 Identification of the Lands

The relevant lands are located directly south of George's Dock and west of the CHQ Building directly north and northeast of the Scherzer Bridges.

The lands subject to the permanent land take include:

1. 1003(1).1c;
2. 1003(2).1g; and
3. 1003(3).1z.

The lands subject to the temporary land take include:

1. 1003(4).2c; and
2. 1003(5).2z.

Figure 2.1 below illustrates these land portions, with Figures 2.3 and 2.4 providing an extract from the CPO Schedules Part I and Part II.

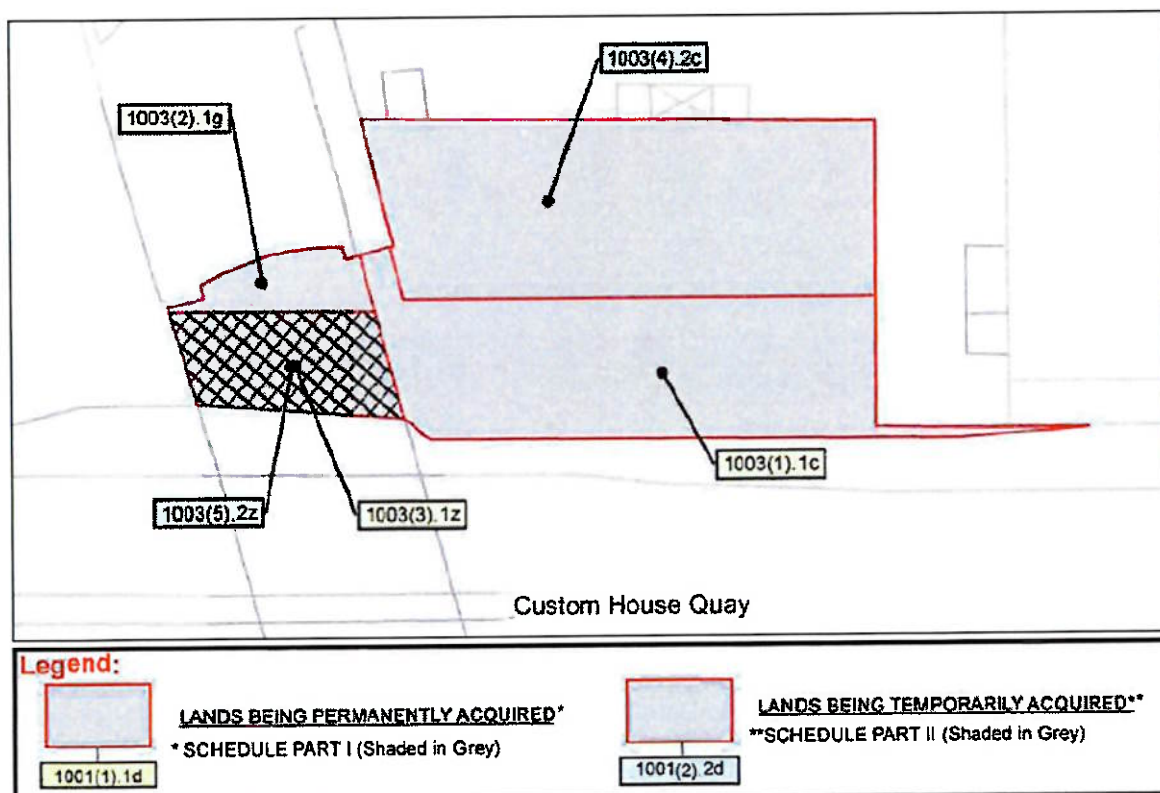


Figure 2.1: Extract from Dwg. No. 0016-SM-0050 Rev. M01 from File Name *Lands to be Compulsorily Acquired Server Map* prepared by the NTA, dated 22nd June 2023 showing the proposed permanent and temporary land take at the subject lands.

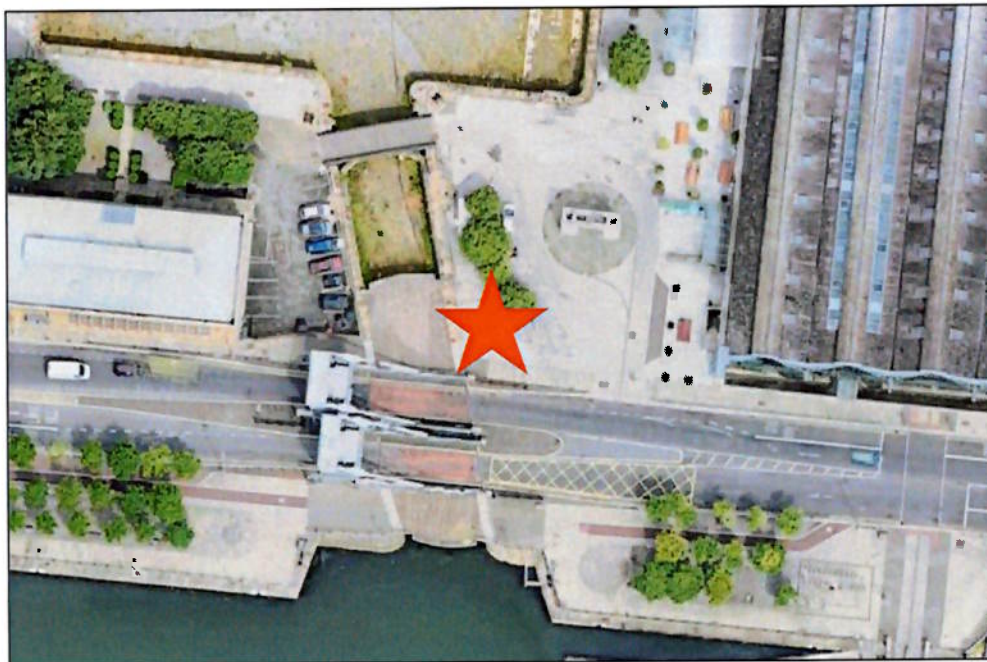


Figure 2.2: Google Earth aerial photograph illustrating the general location of the lands subject of the CPO (temporary and permanent).



**SCHEDULE
PART I**

Lands Being Permanently Acquired

Land other than land consisting of a house or houses unfit for human habitation and not capable of being rendered fit for human habitation at reasonable expense

Number on map deposited at NTA	Quantity, Description, and situation of land		Owners or Reputed Owners	Lessees or Reputed Lessees	Occupiers
1003(1).1c	Area (Ha): Area (m2): Description: County: Address:	0.02705 270.5 Commercial Dublin Public space at George's Dock and CHQ Building, Custom House Quay, Dublin 1	CHQ Dublin Ltd, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01YY59 Custom House Docks Management Ltd., Apleona Real Estate Limited, Landscape House, Landscape Road, Churchtown, Dublin 14 D14A6P3 Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F	None	Owner(s)
1003(2).1g	Area (Ha): Area (m2): Description: County: Address:	0.00346 34.6 Riverbed Dublin Public space at George's Dock and CHQ Building, Custom House Quay, Dublin 1	CHQ Dublin Ltd, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01YY59 Custom House Docks Management Ltd., Apleona Real Estate Limited, Landscape House, Landscape Road, Churchtown, Dublin 14 D14A6P3 Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F	None	Owner(s)
1003(3).1z	Area (Ha): Area (m2): Description: County: Address:	0.00767 76.7 Airspace Dublin Public space at George's Dock and CHQ Building, Custom House Quay, Dublin 1 Freehold acquisition of airspace from a level of 3.095m above Ordnance Datum Malin Head. Shown as hatched area on deposit map.	CHQ Dublin Ltd, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01YY59 Custom House Docks Management Ltd., Apleona Real Estate Limited, Landscape House, Landscape Road, Churchtown, Dublin 14 D14A6P3 Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F	None	Owner(s)

Figure 2.3: Extracts from Schedule Part I Lands Being Permanently Acquired from Ringsend to City Centre Core Bus Corridor Scheme Compulsory Purchase Order, 2023.



**SCHEDULE
PART II**

Lands Being Temporarily Acquired

Land other than land consisting of a house or houses unfit for human habitation and not capable of being rendered fit for human habitation at reasonable expense

Number on map deposited at NTA	Quantity, Description, and situation of land		Owners or Reputed Owners	Lessees or Reputed Lessees	Occupiers
1003(4).2c	Area (Ha): Area (m2): Description: County: Address:	0.03329 332.9 Commercial Dublin Public space at George's Dock and CHQ Building, Custom House Quay, Dublin 1	CHQ Dublin Ltd, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01YY59 Custom House Docks Management Ltd., Apleona Real Estate Limited, Landscape House, Landscape Road, Churchtown, Dublin 14 D14A6P3 Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F	None	Owner(s)
Number on map deposited at NTA	Quantity, Description, and situation of land		Owners or Reputed Owners	Lessees or Reputed Lessees	Occupiers
1003(5).2z	Area (Ha): Area (m2): Description: County: Address:	0.00767 76.7 Airspace Dublin Public space at George's Dock and CHQ Building, Custom House Quay, Dublin 1 Temporary acquisition of airspace from a level of 2m below Ordnance Datum Malin Head and above. Shown as hatched area on deposit map.	CHQ Dublin Ltd, Unit 7, CHQ Building, Custom House Quay, Dublin 1, D01YY59 Custom House Docks Management Ltd., Apleona Real Estate Limited, Landscape House, Landscape Road, Churchtown, Dublin 14 D14A6P3 Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F	None	Owner(s)

Figure 2.4: Extracts from Schedule Part II Lands Being Permanently Acquired from Ringsend to City Centre Core Bus Corridor Scheme Compulsory Purchase Order, 2023.

2.2 Key Issues Arising from CPO

On review of the General Arrangement Drawings for the Proposed Bus Corridor Scheme lodged with the Board that it appears that the lands are required to facilitate the relocation of the Scherzer Bridges and the works associated with same, along with altered bridge at George's Dock, footpath and hard standing area.

It is noted that the area subject to the temporary CPO is larger than the permanent land-take area and on review of Chapter 5.0 Construction of the EIAR that this is to facilitate the provision of a construction compound (Compound R1, which will have two different layouts before and after the removal of the Scherzer Bridges). See Figures 2.5 and 2.6 below.

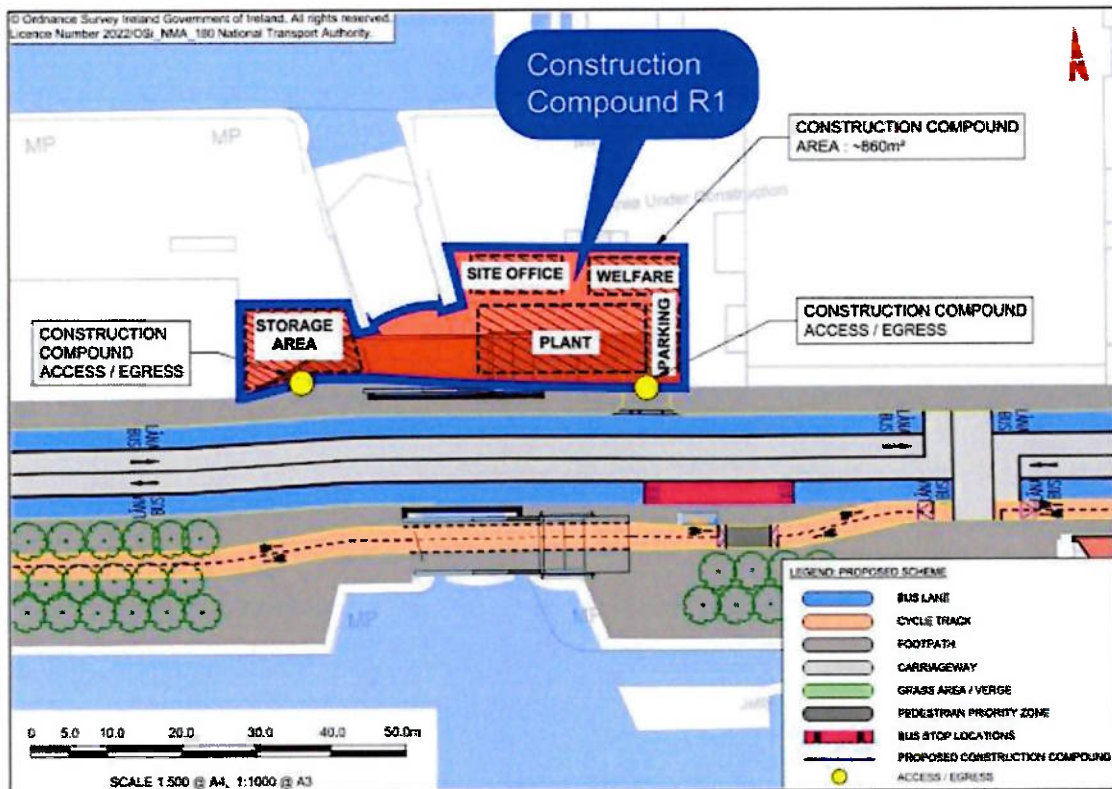


Figure 2.5: Location and extent of Construction Compound R1 in size located on our Client's lands. (Source: Extracted from Figure 5.1 of the EIAR.)

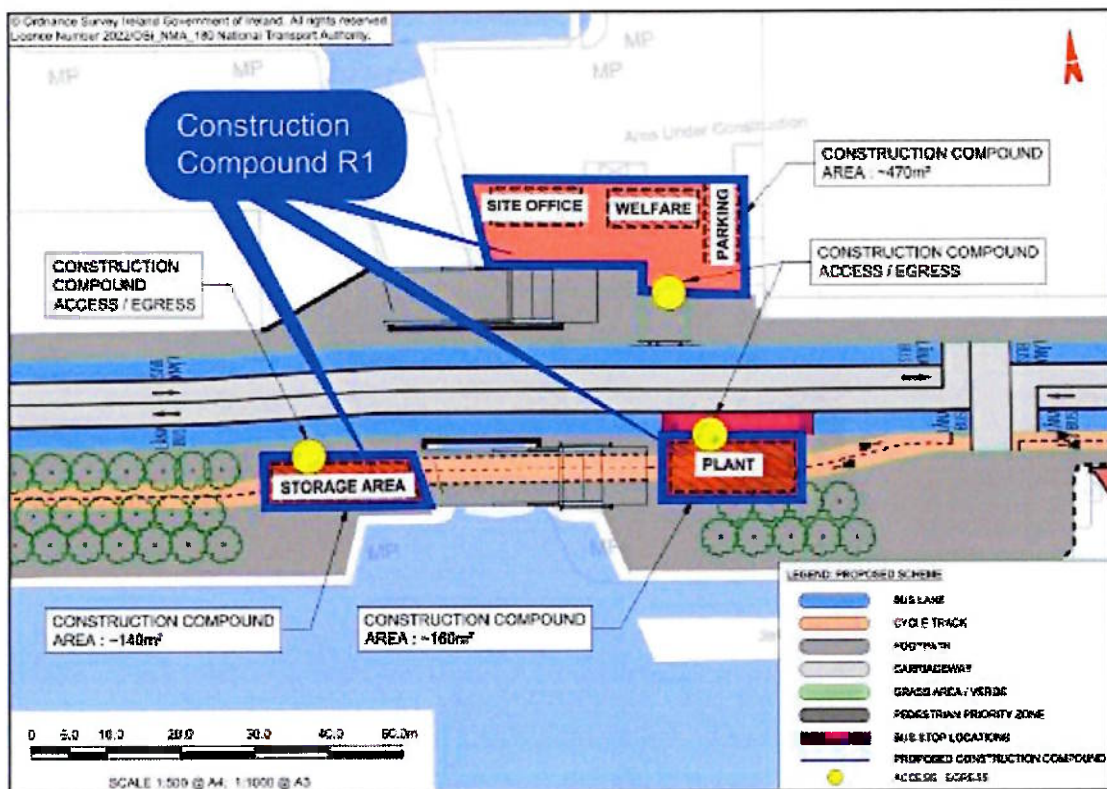


Figure 2.6: Location and extent of Construction Compound R1 after relocation of the Scherzer Bridges. (Source: Extracted from Figure 5.2 of the EIAR.)



Our Clients wish to highlight, however, that the CPO does not clarify or describe the full nature of the works proposed that result in the requirement to acquire the relevant lands on a temporary and permanent basis.

Our Clients are concerned regarding the duration required for the temporary acquisition. Section 5.3.1 of the EIAR states that the expected construction duration will be approximately 24 months for Section 1a Talbot Bridge to Samuel Beckett Bridge – North Quays, in which the subject lands are located. Confirmation is requested from the NTA as to whether the temporary acquisition will be for 24 months or longer? Detail on the finishes to be installed on the areas that are returned to our Clients at the end of the temporary acquisition period is also requested.

Following from this, our Clients have significant concern regarding the potential for impeded pedestrian access to and from the CHQ Building and EPIC Museum. It is highlighted that the pedestrian access and egress into the IFSC and the CHQ Building / EPIC Museum around the triumphal arch at the CPO must be maintained for visitors and businesses to the area. It appears from Figures 2.5 and 2.6 that the main entrance to the CHQ Building (to the southwest) will be majorly impacted upon by the proposed CPO, even if it is during the construction stage, this will be very disruptive to the CHQ's tenants and the Museum. Circa 2.5 million pass in and out of the CHQ building per annum, which translates to anywhere between c. 4,000-8,000 people per day, depending on the events that might be held therein. Many other millions pass along the very busy pedestrian spine (internally within the buildings and externally to the west of the CHQ Building) linking the wider area with the IFSC between George's Dock and CHQ to and from Custom House Quay and Mayor Street to and from George's Dock LUAS stop, Connolly Station, Busáras or Amiens Street.

We draw the Board's attention in particular to Figure 2.6 which appears to show that no pedestrian access will be available whatsoever between Custom House Quay and George's Dock via the external space to the west of the CHQ Building once the Scherzer Bridges are relocated. The importance of the CHQ building's access and the routes around the building for pedestrian permeability cannot be underestimated. In this regard, the proximity of the two Compound R1 layouts are unacceptable request alterations to protect pedestrian traffic flows on an ongoing basis during the construction stage. Further, we raise 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. There is also concern that the hoarding may create a potential bind-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.

It is highlighted that there are drainage culverts at George's Dock that would require protection during the works but this also raises the query of what entity would become responsible for these areas on completion of the CPO, particularly as only a portion of the bridge over the link between George's Dock and the River Liffey will be transferred to the NTA? The ongoing future maintenance of this is key to ensure it functions correctly.

Furthermore, in the event of approval from the Board, the CPO does not provide a timeline of events up to the finalisation of the CPO and payment of the compensation.

Finally, our Clients express concern at the Proposed Bus Corridor Scheme works as outlined in the application with the Board and how the Scheme's implementation could impact on the



future valuation of the lands to be acquired and also the balance of the lands not being acquired by the CPO. We seek that the value of the lands are not impacted upon negatively as a result of the proposed works.

These are key areas that our Clients require clarity and further information on, as well as alterations to the layouts of Compound R1, prior to the Board approving the CPO.

3.0 HOW THE LANDS ARE AFFECTED BY THE APPLICATION

Our Clients have 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. This is further detailed below.

3.1 Lands Affected

To reiterate from above, our Clients' concerns relate to ensuring that the IFSC area basement car parks and access to other car parks enjoy continued, unimpeded access. Access to the basement beneath IFSC House, La Touche House and International House is via Custom House Quay, with access to other car parks via Commons Street from Custom House Quays / North Wall Quay. (Car parks served by Commons Street include those used by customers of Park Rite and IFSC car park and tenants of The Exchange building.)

However, our Clients note with significant concern that the arrangements proposed to deliver the Proposed Bus Corridor Scheme result in significantly impeded access, which will have a detrimental impact on the users of those car parks whom our Clients represent.

3.1.1 Removal of Right Turn onto Commons Street Travelling From East

At present, to gain access to car parking areas on Commons Street when travelling from the east via North Wall Quay, a short right-turning lane exists. However, the Proposed Bus Corridor Scheme illustrates prohibition of right turning traffic from North Wall Quay onto Commons Street, which will have a significant impact on the users of the car parks on that street as well as the vehicles that use Commons Street for tenant deliveries, servicing and waste collection.

This is illustrated in the annotated NTA Drawing extract included below as Figure 3.1.

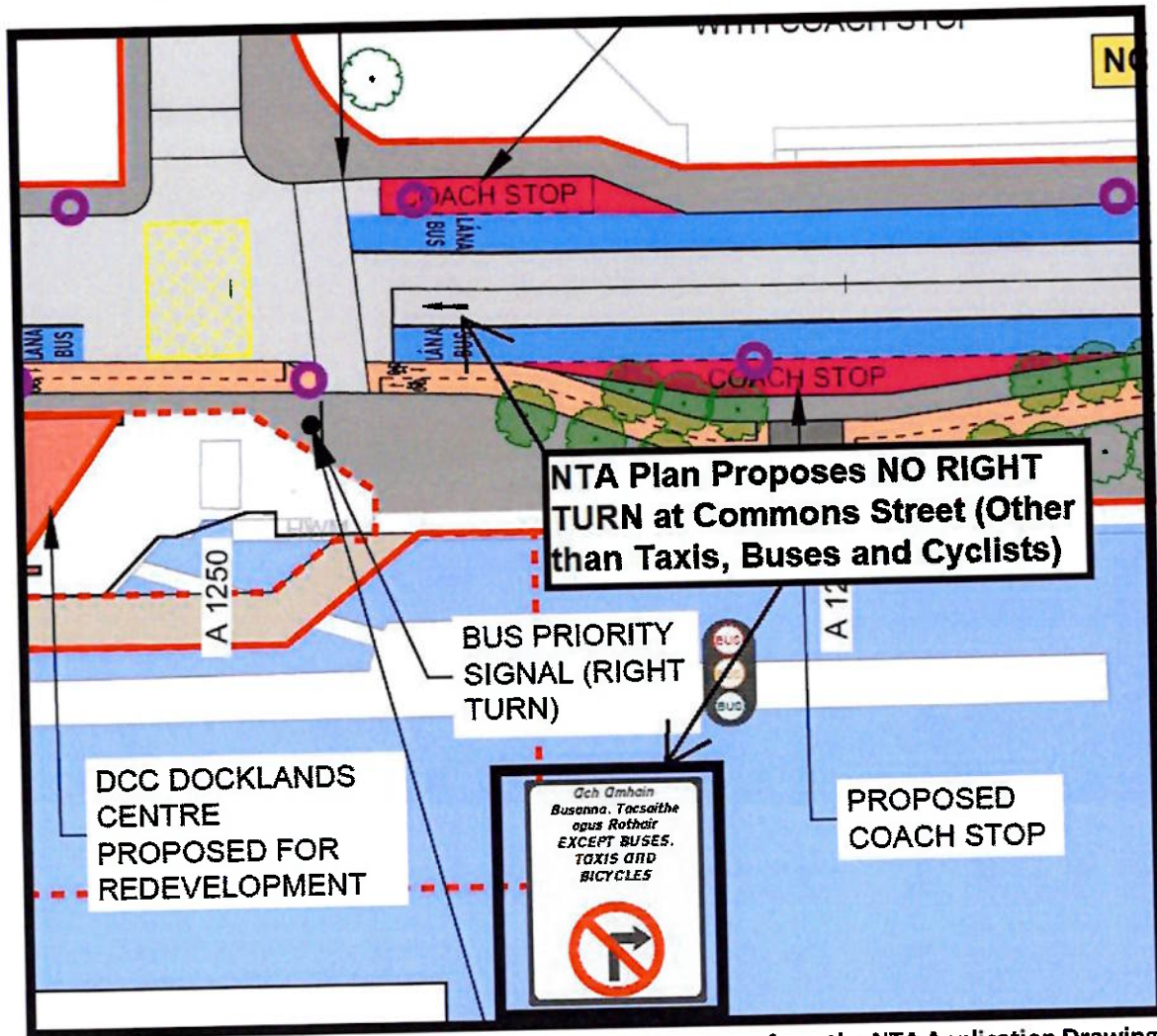


Figure 3.1: NRB Consulting Engineers' annotated extract from the NTA Application Drawings prepared. (Source: General Arrangement Sheet 02 of 12.)

We highlight that Commons Street provides access for the majority of traffic accessing the International Financial Services Centre (IFSC), and we include below a Google Streetview Image showing the access to the 370 space IFSC Car Park (operated by Park-Rite).



Figure 3.2: NRB Consulting Engineer's annotated Google Streetview image showing Commons Street IFSC Carpark.

In the event that the NTA proceed with plans to restrict access to Commons Street as planned, this will have a hugely negative impact upon the entire IFSC (and on the viability and accessibility of the long-established car park) as well as on the ability for the tenants of these buildings to be serviced by delivery and waste vehicles.

The resulting diverted route for traffic to access the IFSC and the car park is illustrated on the Google Streetview Aerial image below. Not only will the private car be affected, but also delivery and service vehicles will also be pushed into the more residential areas of this part of the City, which may result in adverse impacts on these residents, notwithstanding the significant impact it would have on the tenant's ability to have their properties serviced fully and without impediment.

This forced alternative route would add approximately 1km to each journey, and even if the very real commercial implications are disregarded, this in itself will have a very significant negative environmental impact associated with the increased travel journey times.

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 3.4.

This right turn feature can easily be accommodated in the NTA design with minimal effect. 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 request and encourage the NTA and ABP to maintain the right turn lane and remove the right turn prohibition at this junction so as to minimise the adverse effects on the entire IFSC and its accessibility for our Clients' lands and the associated tenants of buildings using this route.

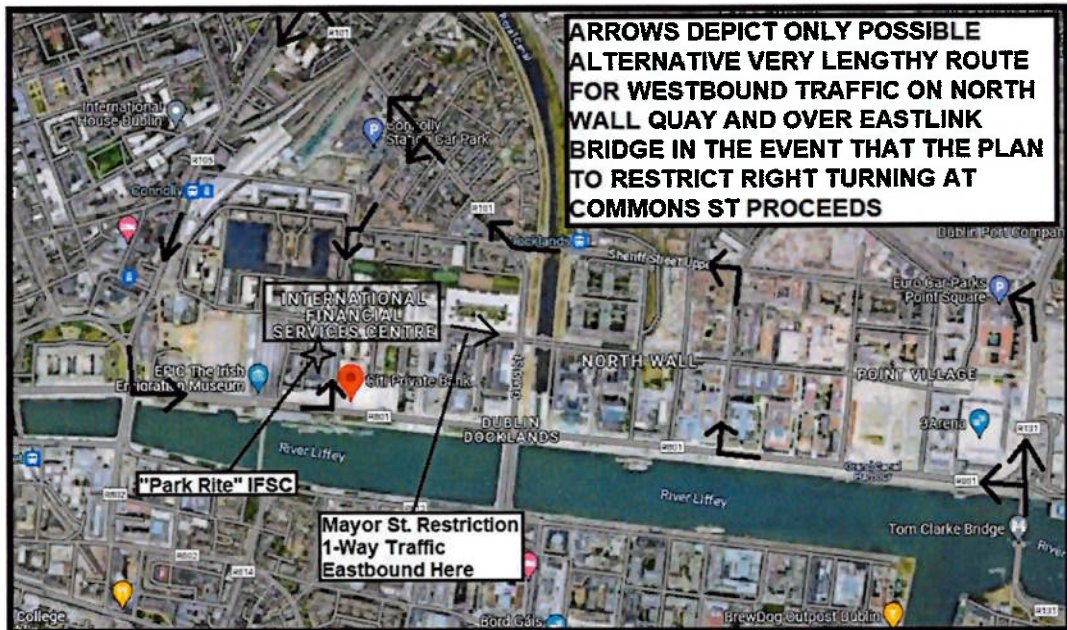


Figure 3.3: NRB Consulting Engineer’s annotated Google Aerial Streetview of additional travel distance/route.



Figure 3.4: NRB Consulting Engineer’s Annotated Google Aerial Streetview of existing right turn lane.



3.2 Potential Disruptions

The proposed construction works, due to their immediate proximity to our Clients' lands and neighbouring buildings, will result in significant diversions, closures, restricted access and construction-related traffic on the area for a prolonged period of time. The likely traffic related impacts that will result from these should not be underestimated.

Furthermore, our Client is concerned that the implementation of the Proposed Bus Corridor Scheme could have significant impact on infrastructure and utilities during the construction phase. 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 would require certainty that similar instances would not occur as a result of these works.

In summary, we highlight that the proposed construction works will result in restricted vehicular movements in the IFSC area. The importance of the continued and uninterrupted operation of the IFSC cannot be underestimated.

We trust the Board will take these construction-related concerns into account in assessing the application.

3.3 Delays and Uncertainty

Finally, we further highlight that any decision that is made by An Bord Pleanála to approve the Proposed Bus Corridor Scheme has a myriad consequences for an affected landowner that go beyond the rules governing the assessment of compensation. Primarily, these consequences arise from the uncertainty surrounding the commencement date and date of completion if the Proposed Bus Corridor Scheme is approved, along with the associated CPO.

It is our further opinion that the Board should satisfy itself that the acquiring Authority is bound to proceed in a timely fashion if the Proposed Bus Corridor Scheme is confirmed. We request that the Board impose binding conditions on the acquiring Authority in respect of these programme to give certainty to our Clients in the event of the scheme and the CPO's approval.



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 raises concerns around the CPO in respect of the nature of the works, the timeline to implement and the potential knock-on effect the CPO and works proposed in the application could have on the future valuation of the lands. Our Clients request the re-siting of Compound R1 to protect the pedestrian traffic flow around and into and out of the CHQ Building.

Furthermore, the application raises serious concerns regarding the ability for our Clients' tenants to access and egress car parks, such as IFSC House and access to Commons Street, which provides access to several car parks, as well as ensuring that the servicing of our tenants properties by vehicles requiring access to Commons Street are unaffected. We suggest the NTA makes minor alterations to allow these accesses to be maintained.

In this context, we highlight the potential significant impact that the construction of the Proposed Bus Corridor Scheme will have upon access to the IFSC car parks, including the significant challenge that will arise in respect of maintaining a access and egress to the car parks.

It is therefore imperative that the proposed works and associated impacts upon the IFSC, Custom House Quay area and North Wall Quay area, specifically access and egress to the roadways and basements, including the consequent connectivity to the wider city area that is currently enjoyed by our Clients are given full consideration by An Bord Pleanála during the application process and by the relevant authorities throughout the construction process.

Our Clients 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,


Síne Kelly
Associate
Tom Phillips + Associates




APPENDIX A: Copy of the Public Notice in respect of the Ringsend to City Centre Core Bus Corridor Scheme Application.




NTA
Údarás Náisiúnta Iompair
National Transport Authority



BUS CONNECTS
SUSTAINABLE TRANSPORT FOR A BETTER CITY



Riadas na hÉireann
Government of Ireland



Tionscadal Éireann
Project Ireland
2040

FORM OF NOTICE TO BE PUBLISHED PURSUANT TO SECTION 51(3)(a) OF THE ROADS ACT 1993 (AS AMENDED) IN RELATION TO AN APPLICATION FOR APPROVAL OF A PROPOSED ROAD DEVELOPMENT AND THE SUBMISSION OF AN ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND A NATURA IMPACT STATEMENT.

RINGSEND TO CITY CENTRE CORE BUS CORRIDOR SCHEME

The National Transport Authority (NTA) has applied under section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála ("the Board") for approval in relation to a proposed road development consisting of:

The construction of the Ringsend to City Centre Core Bus Corridor Scheme which has an overall length of approximately 3.2 km on both sides of the River Liffey, and is routed for 1.6 km along the R801 road on Custom House Quay and North Wall Quay on the northside of the River Liffey, and for 1.6 km along the R813 road on City Quay and Sir John Rogerson's Quay on the southside of the River Liffey including the provision of a new opening public transport bridge over the River Dodder from Sir John Rogerson's Quay to the R131 East Link Road at Ringsend. In addition a cycle route will continue over a length of 1.1 km from York Road, Ringsend, via Pembroke Cottages and Cambridge Park through Ringsend Park and along Strand Street and Pembroke Street, Inishown, terminating at Sean Moore Road, all in the County of Dublin and within the Dublin City Council (DCC) administrative area, comprising inter alia:

- 3.2 km of bus priority infrastructure and traffic management;
- 4.3 km of cycling infrastructure and facilities;
- A new opening public transport and pedestrian/cyclist bridge over the River Dodder at Ringsend;
- Relocation and refurbishment of 2 pairs of existing opening bridges over canals at Custom House Quay and North Wall Quay;
- 2 new road bridges over canals at Custom House Quay and North Wall Quay;
- 2 new pedestrian board walks overhanging the River Liffey at Custom House Quay and North Wall Quay;
- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works;
- Provision of 13 signal junction upgrades and associated ancillary works;
- Provision of 16 new/refurbished raised table facilities;
- Reconfiguration of existing bus stops resulting in 12 new bus stops and overall 20 number bus stop facilities;
- Public Realm works including landscaping, planting, street furniture, street lighting, boundary walls and sustainable urban drainage (SUDs) measures;
- Roads associated earthworks including excavation of unacceptable material, importation of material, temporary storage of materials;
- Provision of road pavement, signing, lining and ancillary works;
- Provision of gates, fencing and boundary treatment works;
- Provision of new and diverted drainage infrastructure;
- Diversion of utilities and services including associated ancillary works, and
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping works;

together with all ancillary and consequential works associated therewith.

The location of the proposed road development is illustrated in the accompanying map. The NTA has submitted to the Board the Environmental Impact Assessment Report prepared in accordance with Section 50 of the Roads Act 1993 (as amended) and Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 in respect of the proposed road development.

A Natura Impact Statement has also been prepared and has been submitted to the Board in respect of the proposed road development under Part XAB of the Planning and Development Act 2000 (as amended).

A copy of the application documentation, Environmental Impact Assessment Report and the Natura Impact Statement may be inspected at the following locations on working days during the opening hours listed below from Wednesday 9th of August 2023 to Tuesday 3rd of October 2023.

National Transport Authority
Dán Seáine
Harcourt Lane
Dublin 2, D02 WT20

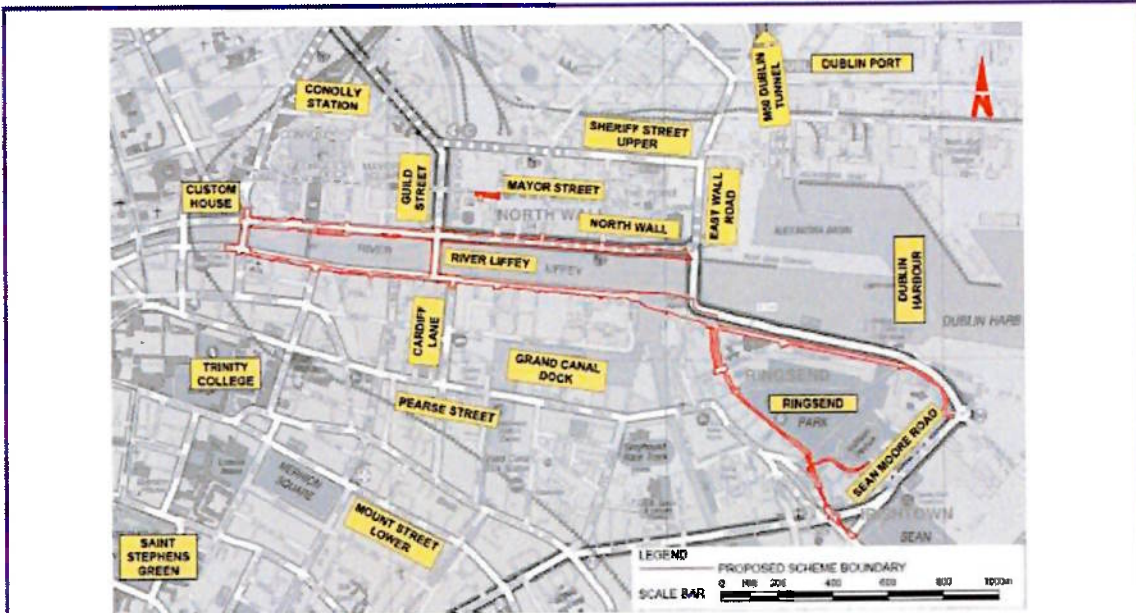
Opening Hours
Monday to Friday 9:15 to 16:00

An Bord Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Opening Hours
Monday to Friday 9:15 to 17:30

Custom House Docks, IFSC
Ringsend to City Centre Core Bus Connects Application & CPO

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A copy of Environmental Impact Assessment Report (EIAR) (or part(s) thereof) and/ or the Natura Impact Statement (NIS) may be purchased from the National Transport Authority on payment of the following fees:

EIAR Volume 1	Non-Technical Summary	€15
EIAR Volume 2	Main Text	€150
EIAR Volume 3	EIAR Figures	€200
EIAR Volume 4	EIAR Appendices	€150
NIS	Natura Impact Statement	€90

from Wednesday 9th of August 2023 to Tuesday 3rd of October 2023.

Such purchase requests may be sent to National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2, D02 WT20 or info@busconnects.ie or by calling 1800 303 653.

A copy of the application documentation, EIAR and NIS may be inspected and downloaded free of charge at the National Transport Authority website for the Ringsend to City Centre Core Bus Corridor Scheme at: www.ringsendcitycentre.ie

The Board may, in relation to an application for approval under section 51 of the Roads Act 1993 (as amended), by order, approve the proposed road development with or without modifications or it may refuse such development or any part thereof.

Submissions/observations may be made in writing to the Board at An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902 in relation to:

- the likely effects on the environment of the proposed road development, if carried out;
- the implications of the proposed road development, if carried out, for proper planning and sustainable development in the area in which it is proposed to situate the proposed road development; and

- the likely significant effects of the proposed road development on a European site
- between Wednesday 9th of August 2023 to Tuesday 3rd of October 2023.

Any submissions/observations must be accompanied by a fee of €50 and must be received by the Board not later than 5.30 p.m. on Tuesday 3rd of October 2023. This fee will not apply to certain prescribed bodies including those specified in section 51(3)(b) of the Roads Act 1993 (as amended) or to landowners and others with a legal interest in land who are objecting to compulsory acquisition of land in which they have such an interest in a compulsory acquisition case.

Submissions/observations can also be made on the An Bord Pleanála website at the following address: <https://online.pleanala.ie/en-IE/nd/observation>.

Any enquiries relating to the application process should be directed to the Strategic Infrastructure Development Section of An Bord Pleanála (Tel. 01-8588100).

A person may question the validity of any decision by the Board on a proposed road development by way of an application for judicial review under the Rules of the Superior Courts (and in particular Order 84 of the Rules of the Superior Courts contained in S.I. No. 15 of 1986 as amended) and in accordance with sections 50, 50A and 50B of the Planning and Development Act 2000 (as amended).

Practical information on the review mechanism can be accessed under the heading: "Legal Notices - Judicial Review Notice" on An Bord Pleanála website <https://www.pleanala.ie/en-IE/Judicial-Review-Notice>. This information is also available on the Citizens Information Service website www.citizensinformation.ie

Dated this day 3rd of August 2023

Aidan Gallagher
Head of BusConnects Dublin Infrastructure
National Transport Authority