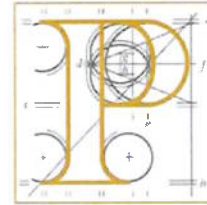


Our Case Number: ABP-317679-23

Your Reference: Park Rite & IFSC Car Park



**An
Bord
Pleanála**

Waterman Moylan
Engineering Consultants
Block S
EastPoint Business Park
Alfie Byrne Road
Dublin 3
D03H3F4

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 accept this letter as a receipt for the fee of €50 that you have paid.

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.

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

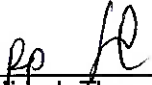
Tel
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(01) 858 8100
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www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Yours faithfully,



Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

Teil
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Láithreán Gréasáin
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Our Ref : 17-040.010
Your Ref : KA 29N. 317735
E-mail : b.mccann@waterman-moylan.ie
Date : 2nd October 2023

An Bord Pleanála,
64 Marlborough Street,
Dublin D01 V902

RE: Ringsend to City Centre Core Bus Corridor Scheme (ABP Ref: KA 29N.317735)

Dear Sirs,

The attached observation on the application by BusConnects for the Ringsend to City Centre Core Bus Corridor Scheme is on behalf of

ParkRite,	and	IFSC Car Park,
2 Custom House Plaza,		Commons Street,
Harbourmaster Place,		North Dock,
IFSC,		Dublin D01 DA34
Dublin D01 V9 V4		

The fee of 50.00 is being paid by credit card.

Please contact the writer with any queries.

Yours sincerely,



Brian McCann
Consultant
Waterman Moylan

Encl (1)

c.c. Mark Feeney, ParkRite

17-040

ABP Ref: KA29N.317735

Ringsend to City Centre Core Bus Corridor

Observation from Park Rite on behalf of the
IFSC Car Park, Commons Street, Dublin 1.

2nd October 2023



Waterman Moylan
Engineering Consultants

Introduction

This observation has been prepared by Waterman Moylan on behalf of Park Rite and the IFSC Car Park, Commons Street, Dublin 1.

The observation addresses the operational and financial threats to the operation of the IFSC Car Park arising from proposals by Bus Connects for the Ringsend to City Centre Core Bus Corridor. Scheme, an application for which was lodged with An Bord Pleanála in August 2023.

Previous Submission

A submission on the importance of access from North Wall Quay to the IFSC Car Park was lodged with Bus Connects on 11th February 2022.

Background

The IFSC Car Park was opened by CHDDCL about 1994. The car park has 370 spaces including 2 disabled spaces. The operational hours for the car park are 06h30 – 00h00 Monday to Friday, 08h00 to 00h00 on Saturday and 09h00 to 00h00 on Sunday.

The area served by the IFSC Car Park is primarily the footprint of the IFSC which is located within the catchment area of the car park. However, the IFSC Car Park also serves the International Financial Services Centre which has an employment population of 14,000 people, the Hilton Garden Hotel, CHQ, CCD, 3Arena, Epic and other venues.

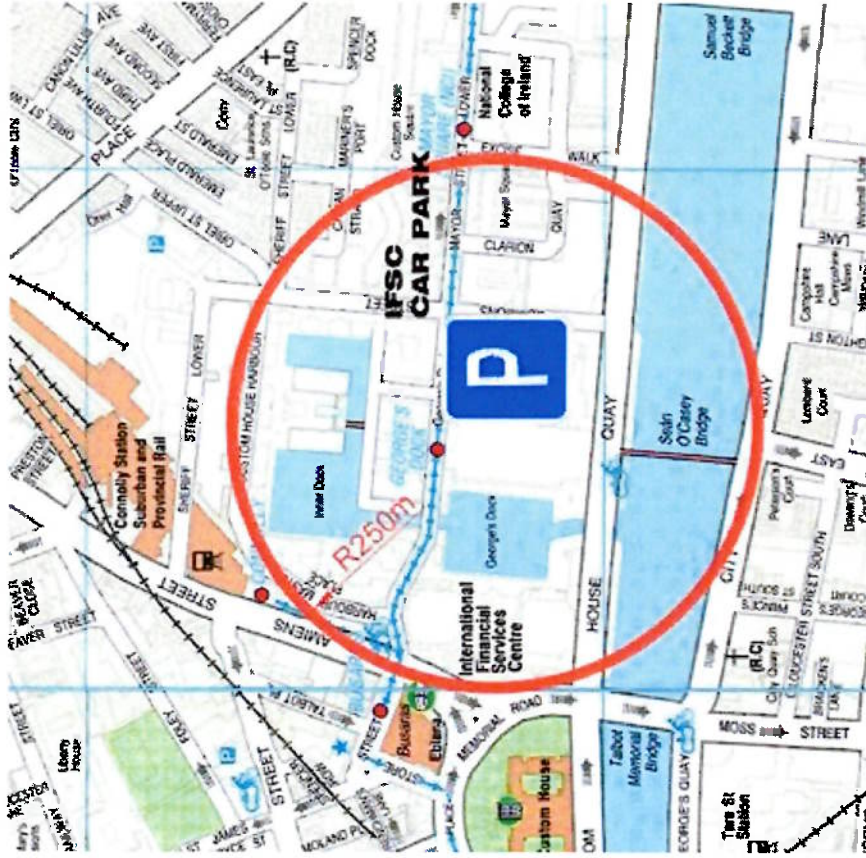


Figure 1 Location Map



Figure 2 Existing Right Turn from North Wall Quay to Commons Street

Existing Access

The primary access route to the IFSC car park is from the North Quays. Some 40% of arrivals are from the east by right turn off North Wall Quay and 50% from the west by left turn off North Wall Quay . The remaining 10% access the car park from Seville Place via Oriel Street Upper. The current proposals by Bus Connects would eliminate the right turn access from North Wall Quay yo Commons Street thereby increasing the proportion arriving from Seville Place to 50%.

Traditionally and up to the time of writing in September 2023, both a right turn and left turn have been permitted and available from Custom House Quay into Commons Street as illustrated in this aerial photo in Figure 2.

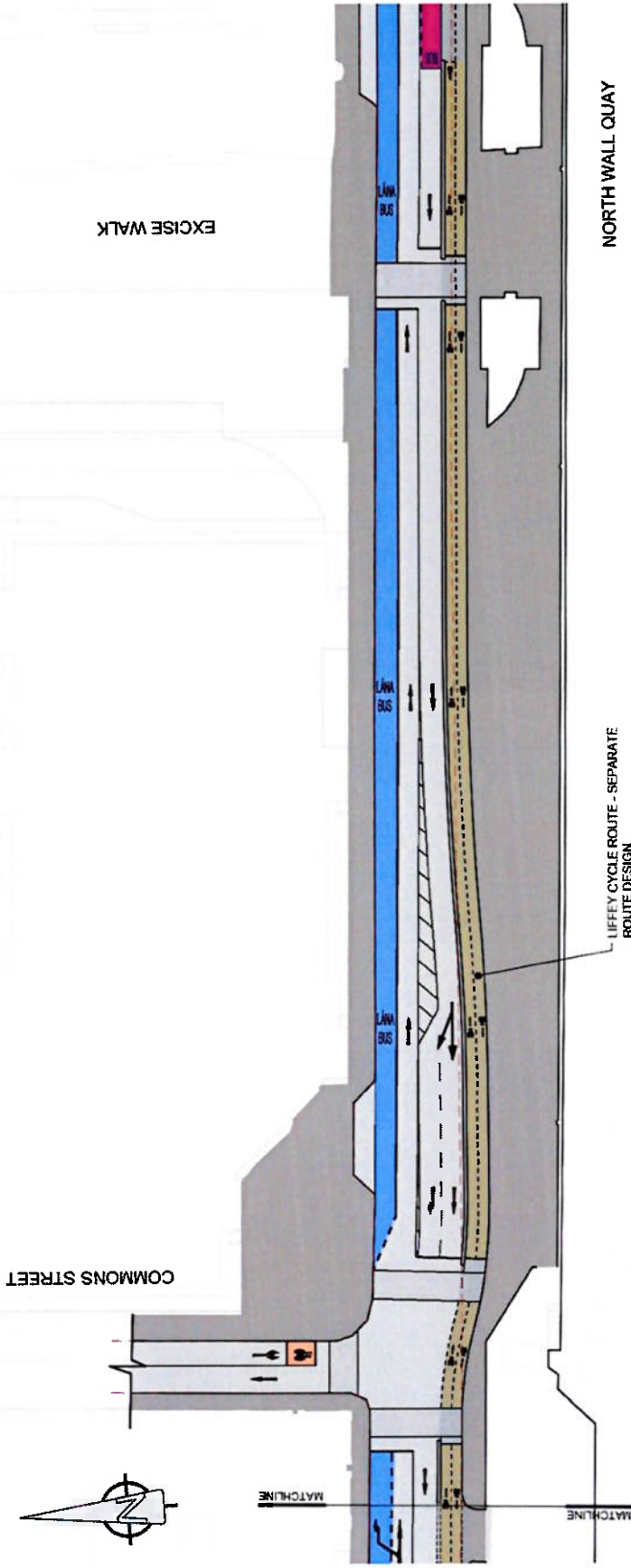


Figure 3 Existing Right Turn from North Wall Quay to Commons Street
 (Extract from Map,2 of Options Study 2017)

Bus Connects Options Study 2017

The original proposals for the Commons Street junction published by Bus Connects in 2017 included for a right turn lane from North Wall to Commons Street and the IFSC Car Park as shown in Figure 3. Figure 3 is an extract from Map 2 of the Options Study for the Ringsend to City Centre Core Bus Corridor issued by Bus Connects in October 2017.

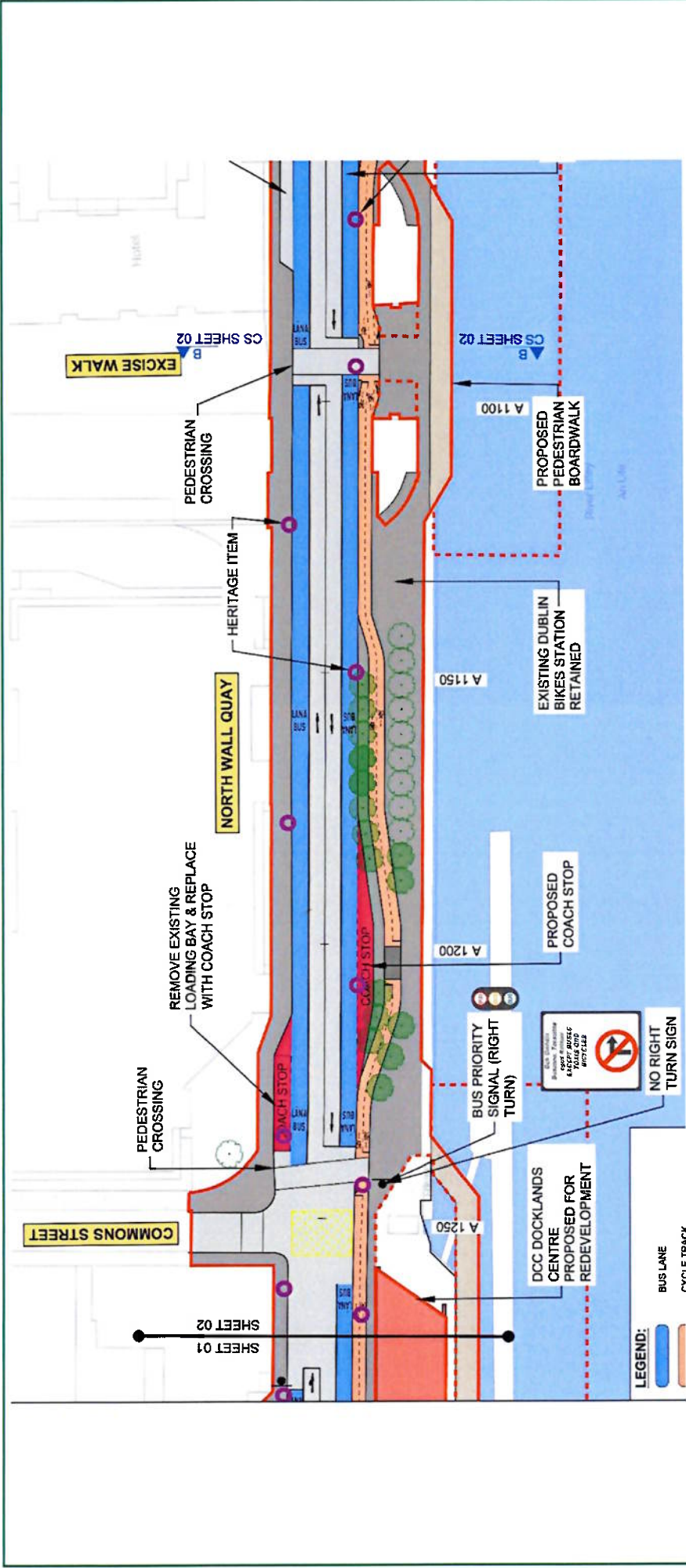


Figure 4 Ban on Right Turn from North Wall Quay to Commons Street
 (Extract from General Arrangement Sheet 2 2023)

Ringsend to City Centre Core Bus Corridor Scheme 2023

The current proposals for the Commons Street junction included in the application to An Bord Pleanála in August 2023 includes for a ban on the right turn lane from North Wall to the IFSC Car Park as shown in Figure 4. The ban will not apply to buses, taxis or bicycles. The alternative access proposed is a diversion of 40% of incoming customers from North Wall Quay to Seville Place and through the residential areas including Oriel Street Upper.

Financial Viability

The current proposals for the Commons Street junction incorporating a ban on the right turn from North Wall Quay to Commons Street will affect up to 40% of the incoming customers to the car park.

If 50% of these customers divert via Seville Place and the remaining 50% park elsewhere, the negative impact on the IFSC Car Park will be significant.

A reduction in the number of parking events accompanied by a reduction in turnover could result in the closure of the car park.

In these circumstances, the IFSC Car Park would no longer be able to fulfil its function of serving the International Financial Services Centre and supporting service area.

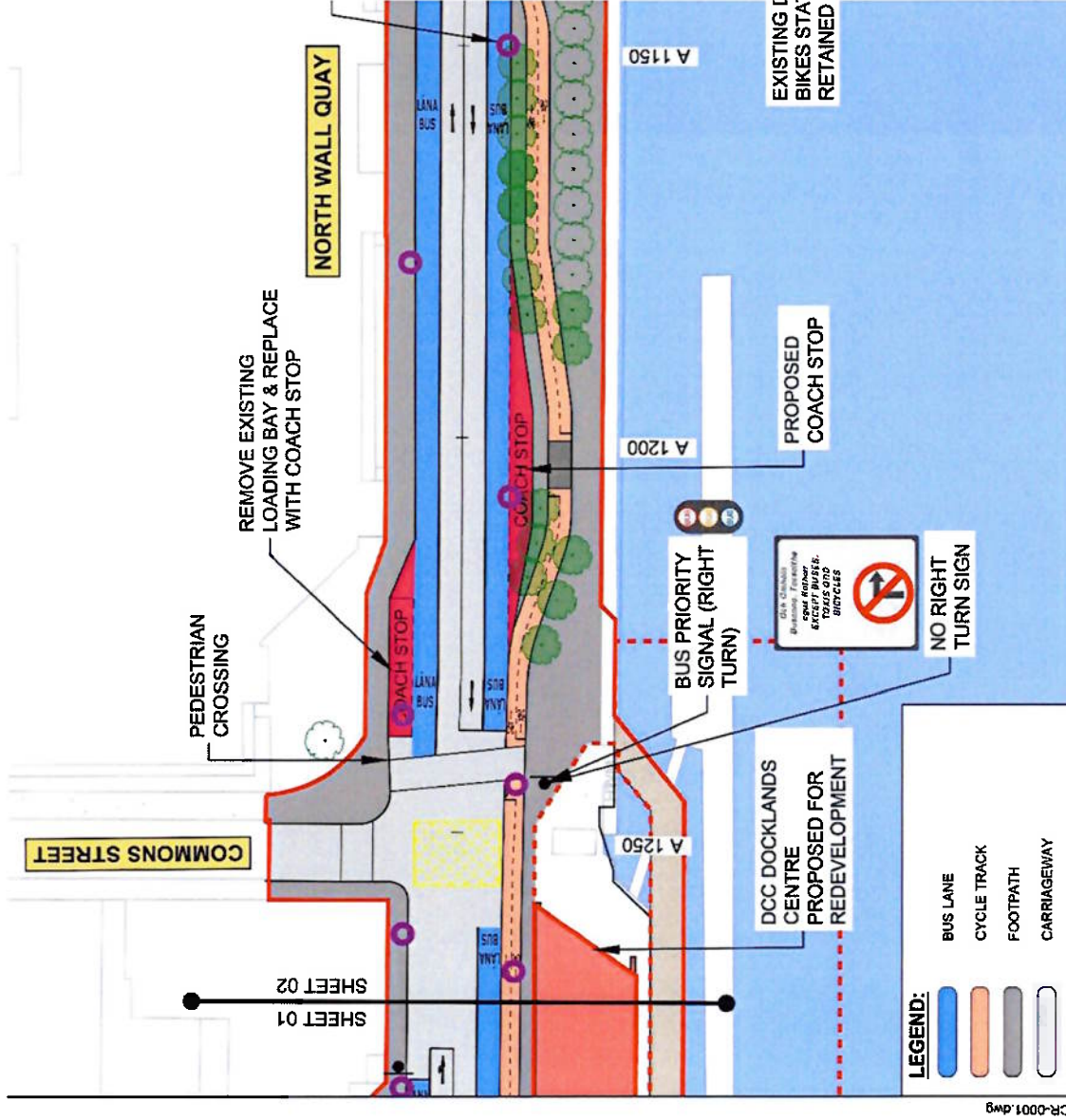


Figure 5 Ban on Right Turn from North Wall Quay to Commons Street

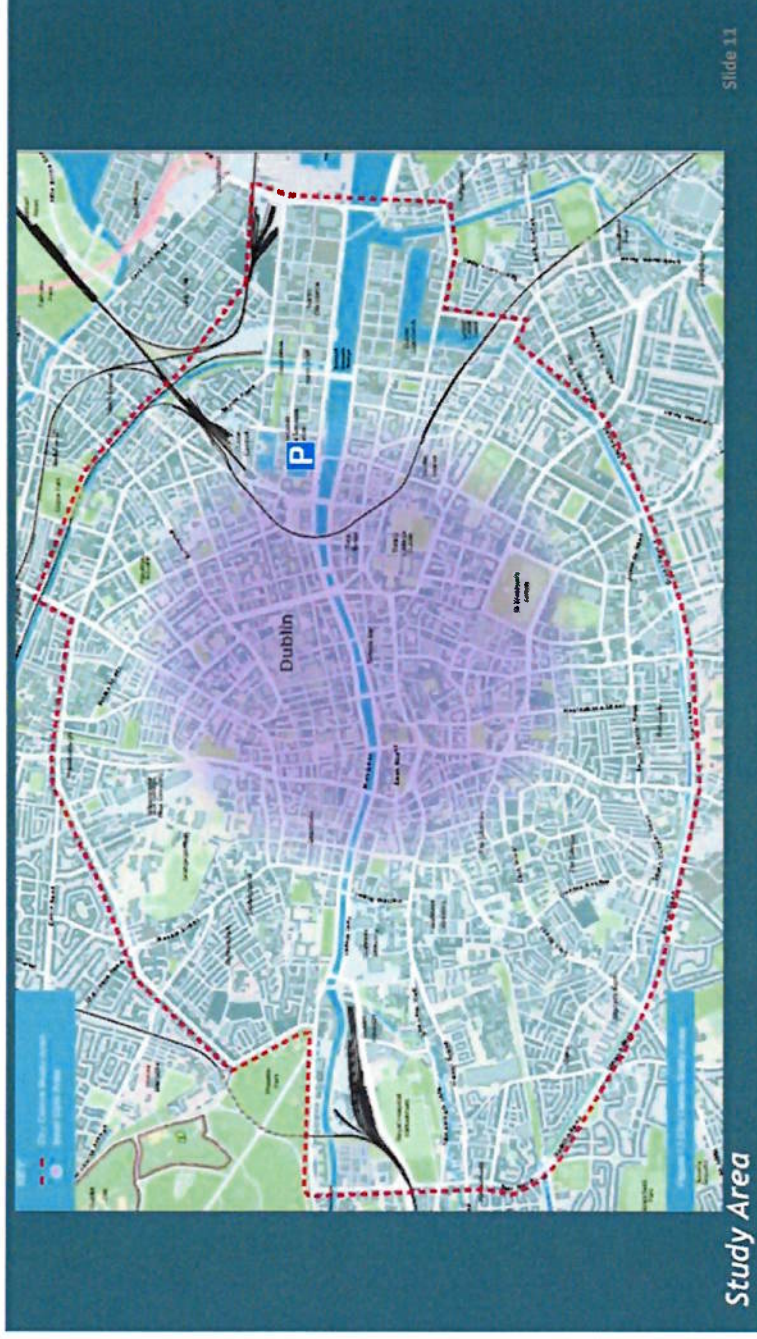


Figure 6 Study Area for the Draft Dublin City Centre Transport Plan 2023 (Slide 11)

Draft Dublin City Centre Transport Plan 2023

The proposals set out in the Dublin City Centre Traffic Plan 2023 envisage large sections of the streets in the City Centre reserved for public transport and cyclists. The centre of the Study Area which has a diameter of about 2.5 km is located in the Ormond Quay area. The IFSC Car Park is ideally located on the edge of the Study Area.

It is the perfect location for incoming drivers to park on the edge of the City Centre and continue onwards into the City Centre by public transport. To fulfil this function, it is essential that the existing access from North Wall Quay be supported and maintained.

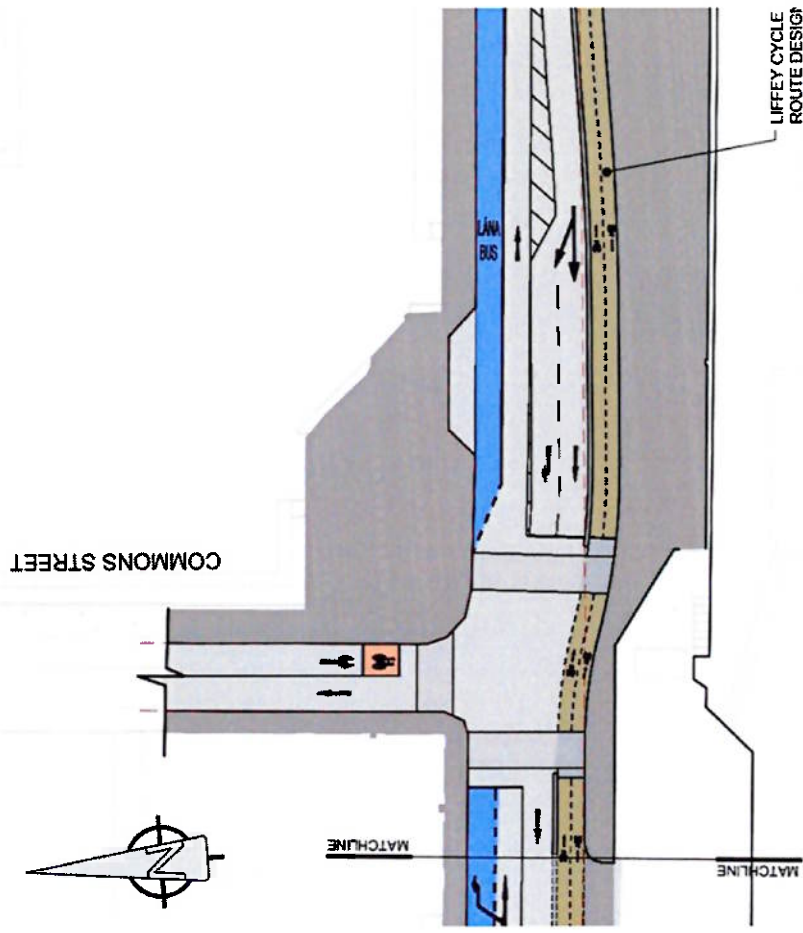


Figure 7 Essential Access to the IFSC Car Park

Submission

On behalf of Park Rite and the IFSC Car Park, we make the following submission:-

- The negative impact of the removal of the right turn from North Wall Quay to Commons Street on the operation of the IFSC Car Park has not been properly assessed in the planning application documentation submitted to An Bord Pleanála for the Ringsend to City Centre Core Bus Corridor.
- The proposal submitted and illustrated in Figure 4 includes 'No right-turn for general traffic with the removal of the existing right-turn lane to accommodate continuous westbound bus lane. Alternative access from the north via Seville Place.'
- The proposal does, however, include a westbound right turn from North Wall Quay into Commons Street for Bus Eireann services
- It is submitted that the existing right turn from North Wall Quay for access into Commons Street as shown in Figure 3 should be retained and supported as it is essential to the ongoing operation and financial viability of the IFSC Car Park.
- If the right turn from North Wall Quay is removed, the access to the IFSC Car Park will be seriously reduced and the number of parking events will be reduced by up to 40% thereby threatening the financial viability of the car park. In addition, traffic to the car park will be diverted unnecessarily to residential streets including Oriel Street Upper .

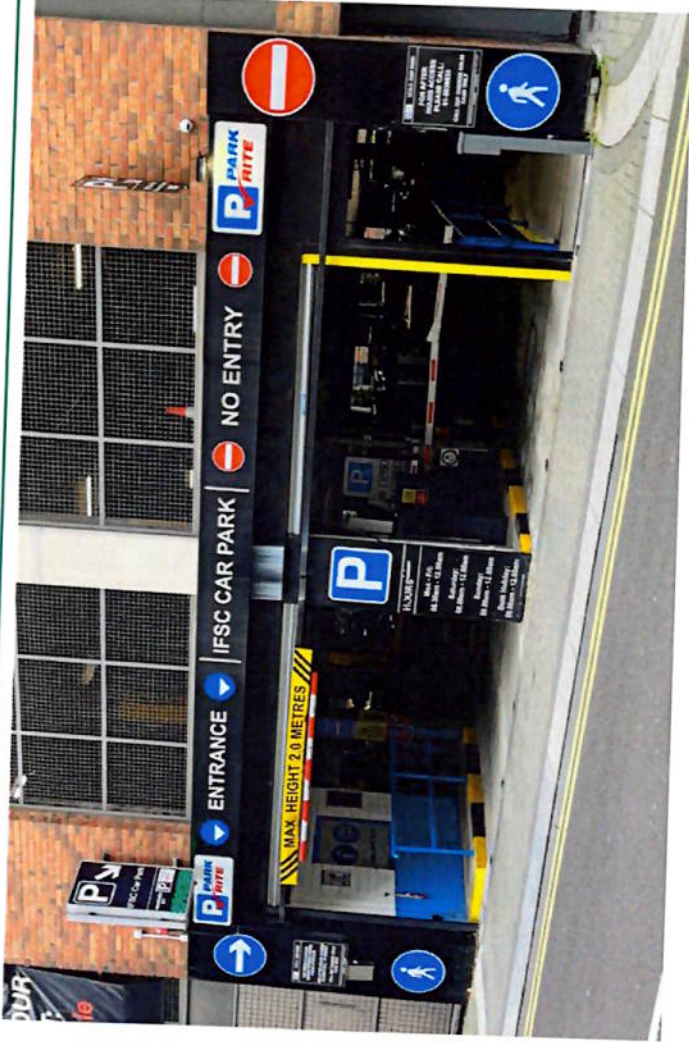


Figure 8 Access to IFSC Car Park on Commons Street

Summary

For the past 29 years, the IFSC Car Park has served the commercial and leisure needs of the surrounding area including hotels, venues and offices. It is ideally located on the perimeter of the City Centre for incoming drivers to park and continue on by public transport.

Current proposals for the Ringsend to City Centre Core Bus Corridor Scheme threaten the accessibility and financial viability of the car park by the imposition of traffic management measures particularly the proposed ban on the right turn from North Wall Quay to Commons Street.

It is submitted that the right turns for westbound traffic on the north quays should be retained not just where required for public transport but also where required for essential access to public facilities such as the IFSC Car Park. Failure to do so will lead to traffic being diverted through residential areas.