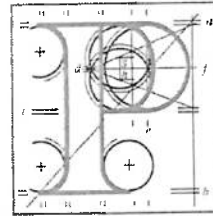


Our Case Number: ABP-317742-23

Your Reference: Melcorpo Commercial Properties Limited



**An
Bord
Pleanála**

BMA Planning
Taney Hall
Eglinton Terrace
Dundrum
Dublin 14
D14 C7F7

Date: 17 October 2023

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin City Centre.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission on behalf of your client in relation to the case mentioned above and will take it into consideration in its determination of the matter.

Please be advised that those listed on the Compulsory Purchase Order schedule associated with this application are not required to pay the €50 fee associated with this case. As your client is listed on the schedule, a refund of €50 will be issued to you under separate cover.

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

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

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

BL50A

Tel (01) 858 8100
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Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

AN BORD PLEANÁLA
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA
LDG- 06 7489-23
ABP- BL-002335-23
10 OCT 2023
Fee: € 50 Type: Cheque
Time: 09:37 By: Courier

09/10/2023

SUBMISSION TO PROPOSED LOCAL AUTHORITY ROADS DEVELOPMENT APPLICATION

BORD REF. HA27.317742

RE: BUS CONNECTS BRAY TO CITY CENTRE BUS CORRIDOR SCHEME

APPLICANT: NATIONAL TRANSPORT AUTHORITY

Dear Sir/ Madam,

On behalf of Melcorpo Commercial Properties Unlimited (hereafter "Melcorpo") of 18 Church Road, Ballybrack, Glenageary, Dublin, we have been instructed to make the following submission to the proposed Local Authority Roads Development Application for the Bray to City Centre Core Bus Corridor Scheme (Bord Ref. HA27.317442).

As detailed below, our client's property at Castle Street Shopping Centre, Castle Street, Bray will be significantly impacted by the proposed development. Castle Street Shopping Centre currently has good access from Castle Street and Lower Dargle Road with 137no. car parking spaces provided within the grounds of the Shopping Centre for use by customers.

If the proposed development is approved in its current form, access to and car parking within the Shopping Centre will be diminished considerably with associated significant impacts on customers, tenants and the viability of the Shopping Centre. The documents submitted with the application do not indicate that these impacts are adequately assessed or mitigated, as detailed further below.

The statutory fee of €50 is enclosed.

CASTLE STREET SHOPPING CENTRE

Castle Street Shopping Centre is situated on Castle Street, Bray which forms the northern extension to Main Street via Fran O'Toole Bridge. The Lower Dargle Road bounds the shopping centre to the south, with Castle Street forming the eastern and northern boundaries to the site. Brabazon

Cottages, St. Laurence's Terrace and associated rear garden/ yard areas define the western boundary to the Castle Street Shopping Centre.

The shopping centre comprises a 1 and 2 storey L-shaped block with continuous built frontage to the Lower Dargle Road. To Castle Street, the shopping centre building is set back from the carriageway and footpath to accommodate a surface car park (137no. spaces) and circulation areas. Access and egress from the shopping centre is provided from both Lower Dargle Road and Castle Street. The centre is anchored by Supervalu and other occupiers include EuroGiant, Starbucks, Lloyds Pharmacy, Peter Mark, Eir and others.



Figure 1: Location and Extent of Castle Street Shopping Centre, Castle Street, Bray

PROPOSED DEVELOPMENT / LANDS TO BE ACQUIRED

As part of the Bus Connects scheme, it is proposed that Castle Street will be widened to accommodate additional bus lane infrastructure which will necessitate the acquisition of Shopping Centre car park areas and setting back of the boundary to Castle Street. As a result, the car parking layout and circulation areas will be moved south and revised including resurfacing and relining works.

Figure 2 below is an extract from the Deposit Map for Castle Street Shopping Centre illustrating the lands to be permanently and temporarily acquired.

Appendix A contains copies of the relevant General Arrangement Plan and Deposit Map relating to the Bus Connects scheme.

Lands within the Shopping Centre demise will be acquired on a temporary and permanent basis as follows: -

Plots 1036(1).1c, 1036(2).1c and 1036(3).1c (All to be Permanently Acquired)

These plots, with a combined area of c.470sq.m, are located along the northern edge of the existing Castle Street Shopping Centre car park and directly adjoining Castle Street. It is proposed that these plots will be permanently acquired to facilitate the widening of Castle Street required to accommodate the proposed Bus Corridor and revised footpath and cycle path layouts.

These plots are within the ownership of Wicklow County Council. Melcorpo currently has a leasehold interest in these plots.

Plot 1036(4).2c (Temporarily Acquired)

This plot comprises the entire of the existing surface car park at Castle Street (c. 3,951sq.m). The lands are proposed to be temporarily acquired to allow for the resurfacing and relining of the Castle Street Shopping Centre car park. The construction works are anticipated to take 9 months.

This plot is part owned by Melcorpo and Wicklow Co. Co. Melcorpo have a leasehold interest in the lands owned by Wicklow Co. Co. The lands within Melcorpo ownership are outlined in blue within **Figure 2**.

All of the lands to be acquired are zoned 'TC – Town Centre' in the *Bray Municipal District Local Area Plan 2018 – 2024*.

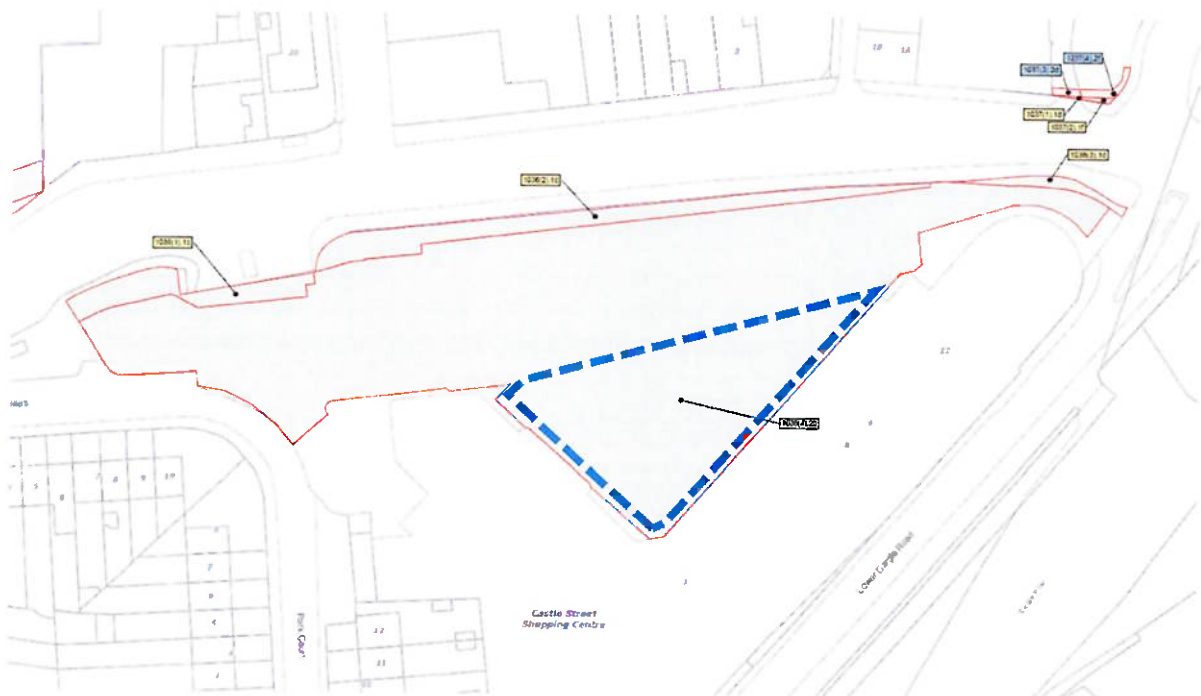


Figure 2: Extract from Deposit Map for Castle Street Shopping Centre (Dwg. no. 0013-DM-0001)
(Melcorpo owned lands are outlined blue. Melcorpo also have a leasehold interest in the remaining lands to be acquired)

GROUNDS OF OBJECTION

Impact on Access to Castle Street Shopping Centre

As part of the proposed Bus Connects scheme and to tie-in with a separate proposal for an upgrade to the adjoining Fran O'Toole Bridge, the Bus Connects proposals include a revision to the Lower Dargle Road junction into the Castle Street Shopping Centre site. At this location, it is proposed that the existing two-way access and egress traffic lanes will be reduced to one traffic lane facilitating inbound access to the Shopping Centre only.

As a result of this revised access to the Shopping Centre, all departures from the Shopping Centre will be directed to the Castle Street exit and those that would have used the Lower Dargle Road exit will likely turn right onto Castle Street.

NRB Consulting Engineers, working on behalf of Melcorpo, have undertaken an analysis of the likely impact of the revised access and egress arrangements from Castle Street Shopping Centre and this is enclosed as **Appendix B**. Regarding the increased traffic movements at the Shopping Centre/ Castle Street junction, the NRB analysis confirms there will be 45-49% increase in the numbers of vehicles turning right onto Castle Street from the Shopping Centre during the PM peak periods. As a result,

there will likely be increased queues and delays at this junction, including significant increased queuing and delays for customers within the Shopping Centre.

In terms of customer convenience and accessibility, the proposed altered access arrangements arising from the Bus Connects proposal, will have a significant, adverse and long term impact on the safe and efficient operation of the Shopping Centre car park. In this context, our client has very serious concerns regarding the proposed Bus Connects scheme and the extent to which the impacts of the proposal have been assessed within the application documents, including the Environmental Impact Assessment Report.

As an outcome to this submission our client requests that the Bus Connects proposals ceases at the northern end of the Castle Street Shopping Centre site. Ending the Bus Connects proposals at that location would maintain the existing access arrangements to the Shopping Centre from Lower Dargle Road and Castle Street and prevent the significant, adverse and long term impacts that are likely to arise from the project.

Loss of Car Parking / Reduced Circulation

The setting back of the Shopping Centre boundary to Castle Street into the Shopping Centre site will result in the reconfiguration of the car park including the loss of car parking spaces and narrowing of circulation routes.

The existing Shopping Centre car park comprises a total of 137no. spaces. The revised layout results in the loss of 13no. car parking spaces reducing the total car parking provision within the site to 124no. car parking spaces – a reduction of c.10%. In addition, the encroachment of the Bus Connects proposal into the site results in the width of the internal access roads within the car park being reduced.

The NRB Consulting Engineers analysis within **Appendix B** also includes a car parking accumulation study to assess the availability of car parking provision within the Shopping Centre. The study notes that the availability of adequate car parking is a key issue for retail developments to minimise search and wait times for customers and to allow for additional demand at seasonal/ peak periods. The car parking assessment concludes that the reduction in car parking on site will mean that car parking demand will frequently match or exceed car parking provision. As a result, customers will experience increased search and wait times and there will be limited additional parking available for seasonal/ peak periods.

Any alteration to the Shopping Centre environment that will make the centre less accessible for customers cars is very concerning for our client. The loss of car parking and reduced circulation will

make the Shopping Centre less convenient for customers and has the potential to impact severely on the level of customers visiting the centre.

On the basis of the above, the Bus Connects proposal should not extend south to include the Castle Street Shopping Centre frontage and car and the project should be truncated at the northern end of the Castle Street Shopping Centre.

Impact on Tenants / Devaluation of Shopping Centre

The proposed revisions to the car park layout and circulation route and access points to the Shopping Centre will also impact on the operation and servicing of the Shopping Centre.

Tenants will need to alter servicing arrangements and schedules to ensure that service vans and trucks can access the revised car parking layout, including the narrower circulation routes. In addition, due to the increased potential for conflict with queuing and searching customer traffic, service vehicles may need to alter servicing arrangements to outside store opening times.

All of the above places additional burdens on existing tenants and has the potential to impact their core function which is to provide ease of access to goods and services for customers.

For the above reasons, the proposed Bus Connects scheme should not extend to include any lands within the Castle Street Shopping Centre demise and any grant of permission should amend the scheme accordingly.

Construction Impacts and Disruption

The construction aspects of the proposed Bus Connects project are described within Chapter 5 of the EIA. The resurfacing and lining works within the Shopping Centre car parking are noted and the intention to undertake the works in a phased manner to keep the car park operational is welcome.

However, the expected duration of the works is approximately 9 months and this is of great concern to our client. Works of that duration will have a significant impact on access for customers and servicing of the shopping centre and will likely result in a loss of trade, some of which is unlikely to return to the centre on completion of the works.

In addition, works of a 9 month duration also have the potential to extend over the winter/ Christmas period and this would be completely unacceptable to our client and the Shopping Centre tenants.

The construction impacts and disruption arising from the project will severely impact the operation of Castle Street Shopping Centre. The project should be amended to exclude the Castle Street Shopping Centre lands on this basis.

Adequacy of EIAR

The above grounds of objection raise concerns with regard to the likely significant impacts that will occur to the Castle Street Shopping Centre in relation to: -

- Access to Castle Street Shopping Centre
- Loss of Car Parking/ Reduced Circulation
- Impact on Tenants/ Devaluation of Shopping Centre
- Construction Impacts and Disruption.

Chapter 6 - Traffic and Transport of the EIAR does not consider the impact of access to Castle Street Shopping Centre which is a significant gap in the assessment. In our view, the EIAR is inadequate on the basis that it does not consider the impact of a 45% increase of vehicles turning right onto Castle Street from the Shopping Centre.

Regarding the loss of car parking, the EIAR concludes that the impact is “negative, slight and long-term”. The loss of 10% of the existing car parking spaces is not, in our view, a slight negative impact on the existing car park.

Chapter 10 - Population of the EIAR considers the land take impacts on commercial premises, including Castle Street Shopping Centre, during the construction phase of the development. There is no assessment of the land take impacts on commercial premises during the operational phase.

This submission has demonstrated that the proposed development will have a significant adverse impact on customers and tenants within the Castle Street Shopping Centre, reducing the accessibility to the centre and the attractiveness of the centre for customers and tenants alike. The result will be a devaluation of the centre, the impact of which has not been assessed in the EIAR.

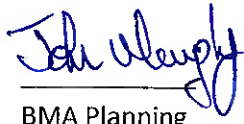
On the basis of the above the Bus Connects Scheme should be amended to exclude any Castle Street Shopping Centre lands.

CONCLUSION

We trust our clients’ concerns will be taken in consideration by An Bord Pleanala in the assessment of the proposed Bus Connects scheme.

Please keep us informed of the progress in relation to the proposed Compulsory Purchase Order.

Yours sincerely,


BMA Planning

APPENDIX A

**Bus Connects Bray to City Centre - General Arrangement Plan (Sheet 52)
and Deposit Map (Sheet 1)**

APPENDIX B

Analysis of Impact of Bus Connects Bray to City Centre on Castle Street Shopping Centre Lands
NRB Consulting Engineers

05 October 2023
23-050/BMcM

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Dear Sir/Madam,

CASTLE STREET SHOPPING CENTRE – IMPACT OF BUSCONNECTS BRAY TO CITY CENTRE CORE BUS CORRIDOR

NRB are appointed as Traffic/Transportation & Roads Consultant in connection with the above development and have undertaken a review of the NTA proposals and their potential impact on the operation of the existing development from a roads, car parking and operational viewpoint.

NRB undertook a review of the NTA drawing Titled “Bray to City Centre Scheme, Proposed Castle Street Car Parking Layout”, by Jacobs, dated 31/08/21, with comments provided below.

12-hour classified interval turning movement surveys were undertaken of the junctions, shown below in **Figure 1.1**, including for a weekday and weekend (Saturday). This included the two development access junctions, so an assessment could be undertaken on the levels of traffic using either junction. This allowed an assessment of the potential impact of the BusConnects proposals on the existing operation of the site, including the proposed reduction of the current entry/exit off Dargle Road to 1 lane entry-only.

Furthermore, the initial car parking occupation was counted, and a car parking accumulation study extrapolated from the traffic surveys which demonstrated the occupancy of the car park over the day and the potential impact of the reduction in car parking numbers.



We have set out below a number of topics for discussion including the following:

- A review of the NTA drawing Titled Bray to City Centre Scheme, Proposed Castle Street Car Parking Layout,
- Site Access Junctions Turning Movement Surveys Results and,
- Car Parking Accumulation Study.



Figure 1.1: Junction Turning Count Locations

1. NTA / Jacobs Layout - Bray to City Centre Scheme, Proposed Castle Street Car Parking Layout

Due to the provision of the BusConnects scheme, it is required to widen the existing road carriageway into the existing shopping centre car park which requires reconfiguration of the Castle Street Shopping Centre Car Park including re-surfacing and lining works.

This requires moving the existing parking spaces further south due to the land-take, which involves removing some of the car park spaces, with the reduction in car parking spaces noted below. Overall manoeuvrability is theoretically similar to before; however, the width of internal car park access routes is narrower than currently exists and than customers are accustomed to.

The existing number of spaces, the number of car parking spaces lost, and the number of remaining spaces are set out below:

- Existing Car Parking Spaces – 137 No
- Car Park Spaces removed (NTA's Layout) – 13 No
- Remaining Car Park spaces (NTA's Layout) – 124 No

The reduction of 13 car parking spaces, from 137 no. car parking spaces to 124 no. car parking spaces, results in a reduction of 9.5% of total existing spaces.

2. Site Access Junctions Turning Movement Surveys Results

NRB have assessed 12-hour classified interval turning movement surveys undertaken at the Site Access Junctions and the Castle Street / Lower Dargle Road Junction. These surveys of the existing junctions were carried out during Thursday 25th May and Saturday 27th May 2023, between 7am to 7pm.

As shown in Tables 2.1 and 2.2, the majority of the trips generated by the existing store, gain access to the development via the Castle Street Junction, with 86% and 87% accessing via this junction during the Thursday & Saturday respectively.

Table 2.1: Existing Turning Movements at Site Access Junctions on Thursday 25th May

Thursday 25th May 2023 7am to 7pm (All Values in PCU)						
	Arrivals		Departures		Total	Total %
	Right Turn	Left Turn	Right Turn	Left Turn		
Castle Street Junction	670	641	339	1047	2697	86%
Lower Dargle Road	6	273	2	150	431	14%
*Primarily Cyclists					3128	100%



Table 2.2: Existing Turning Movements at Site Access Junctions on Saturday 27th May

Saturday 27th May 2023 7am to 7pm (All Values in PCU)						
	Arrivals		Departures		Total	Total %
	Right Turn	Left Turn	Right Turn	Left Turn		
Castle Street Junction	705	705	361	1101	2872	87%
Lower Dargle Road	5	244	7	171	426	13%
*Primarily Cyclists					3298	100%

2a. Changes to Traffic Flows with Altered Car Park

The NTA propose to reduce the existing traffic lane from the Lower Dargle Road from a two-way road, to one-way inbound only.

The total 12-hour departures from the SuperValu Car Park from the Lower Dargle Road exit, during Thursday 25th May was 152 PCU, while during Saturday 27th May it was 178 PCU. With the removal of the exit lane, all of these traffic movements will have to divert to exit to the Castle Street junction and are likely to turn right from this junction.

This results in an increase of 45% (152/339) during Thursday, and 49% (178/361) during Saturday, in terms of the numbers of vehicles turning right from the Castle Street access. This has the potential to increase the existing queues and delays at this junction, in particular during the PM peak periods.

Network flow diagrams are included in Appendix A herewith, which shows the 12-hour, the AM, and the PM peak for the existing and future scenarios, and the increased number of vehicles on the Castle Street Junction.

Car Parking Accumulation Study

An on-site car park capacity survey carried out at a weekday and weekend at the Castle Street Car Parking to assess the availability of parking provision over a 12-hour period between 7am and 7pm, during Thursday 25th May and Saturday 27th May 2023.

For Retail Developments, “Operational Parking” Provision is necessary to minimise congestion on site and waiting times to access the site and also to allow for seasonal/peak periods – A convenience retail Car Park should have extra spaces to accommodate Search Times, Blocked Spaces and peak Demand. We have increased the total accumulation by 15% to reflect this requirement.

The maximum parking demand at any one time over Thursday 25th May was 136, which occurred over a 15-minute period between 11:30 and 11:45, which is less than the 137 no. car parking spaces provided on site. However, when the number of car parking spaces are reduced to 124, the parking demand will exceed supply at 10:15am and for a 2-hour period between 11am and 1pm, as is shown in Figure 3.1 below.

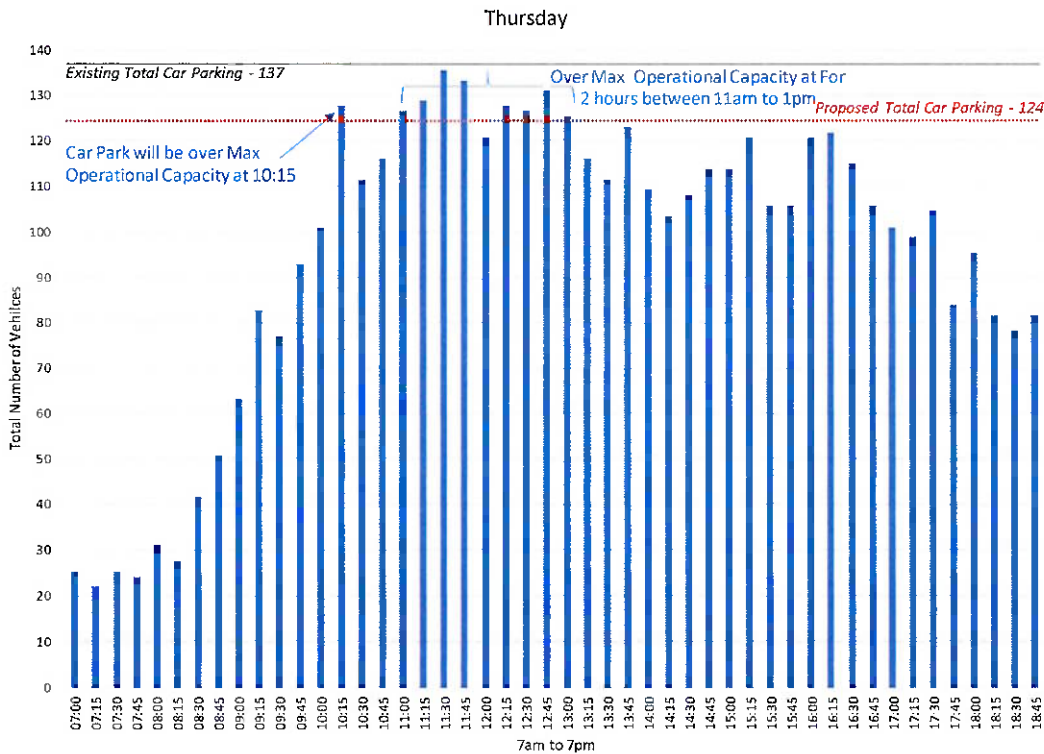


Figure 3.1: Existing Parking Demand with Operational Parking Provision - Thursdays 25th May 2023

The maximum parking demand at any one time over Saturday 27th May was 124, which occurred over a 15-minute period between 10:45 and 11:00, which is less than the 137 no. car parking spaces provided on site. However, when the number of car parking spaces are reduced to 124, the parking demand will match supply at 10:45am, as is shown in Figure 3.2 below.

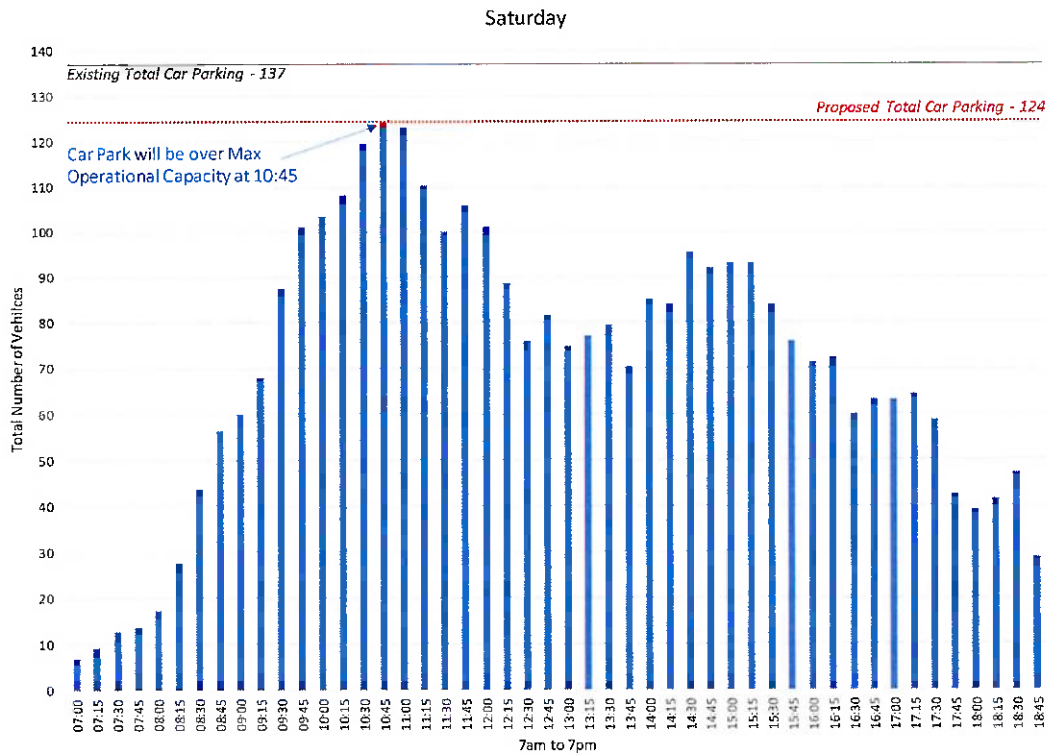


Figure 3.2: Existing Parking Demand with Operational Parking Provision - Saturday 25th May 2023

The Parking Accumulation Study demonstrates that the 12 Hour maximum Parking Demand (including Operational Parking of 15% extra) exceeds the proposed number of car parking spaces for over 2 hours on a weekday and will match it on a Saturday.



Proposed Layout

NRB have assessed the proposed NTA layout, in consultation with the primary stakeholders, and have altered the car parking layout it to accommodate the various HGV tracking movements to suit the operations of the site. NRB also endeavoured to maximise the number of car parking spaces. However, given the new constraints on site, a maximum total of 125no. car parking spaces were achievable, just 1no. car parking space greater than the NTA layout.

Based on our assessment we believe that the reduction in car parking numbers, will have an impact on the operation of the car park during seasonal/peak periods, with longer search times for customers. This will likely have a knock-on effect on Store Turnover, as parking availability is a fundamental requirement of convenience retailers.

Furthermore, customers may face longer delays when exiting the car park, particularly for those turning right out from the site.

Many customers are particular in terms of their choice of shopping destination, ease of accessibility and availability of parking are key considerations.

We look forward to discussing the content of this letter with you.

Yours sincerely,

Brian McMahon

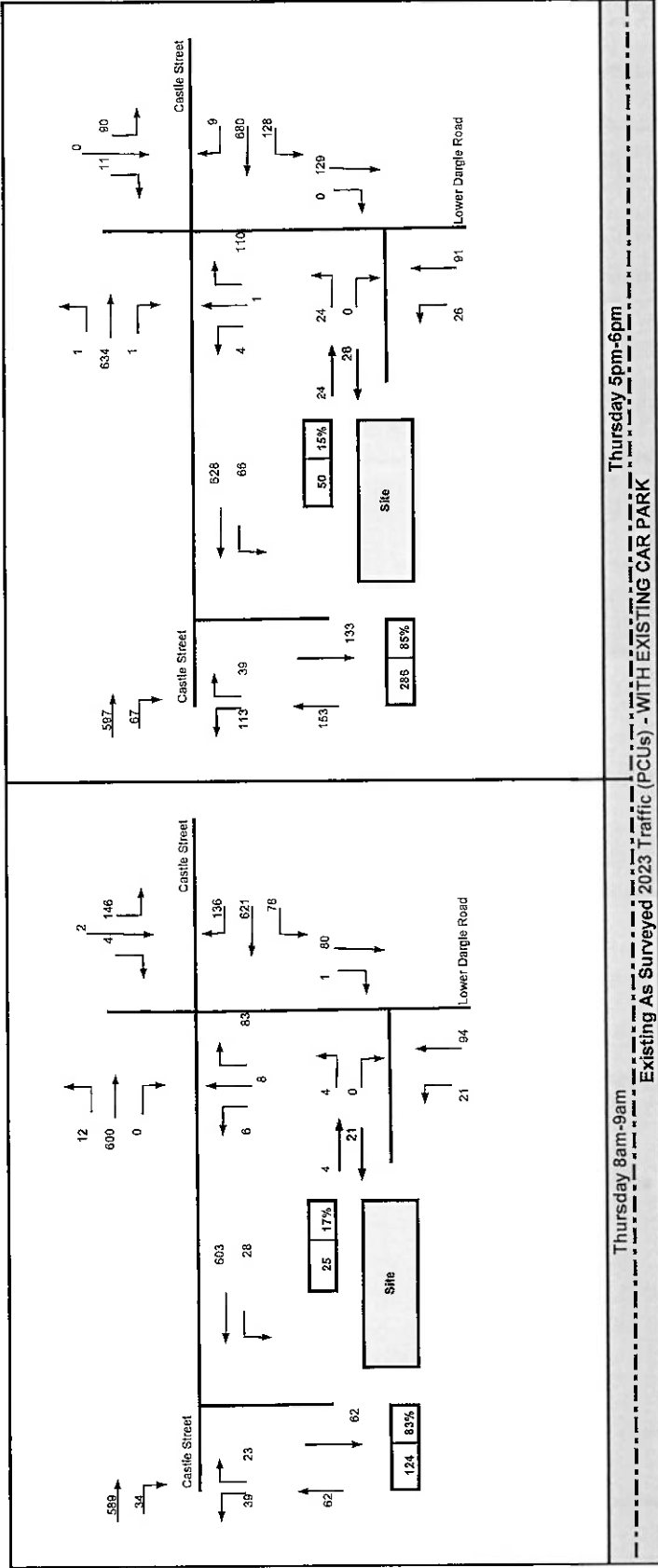
Brian McMahon
Chartered Engineer
Director

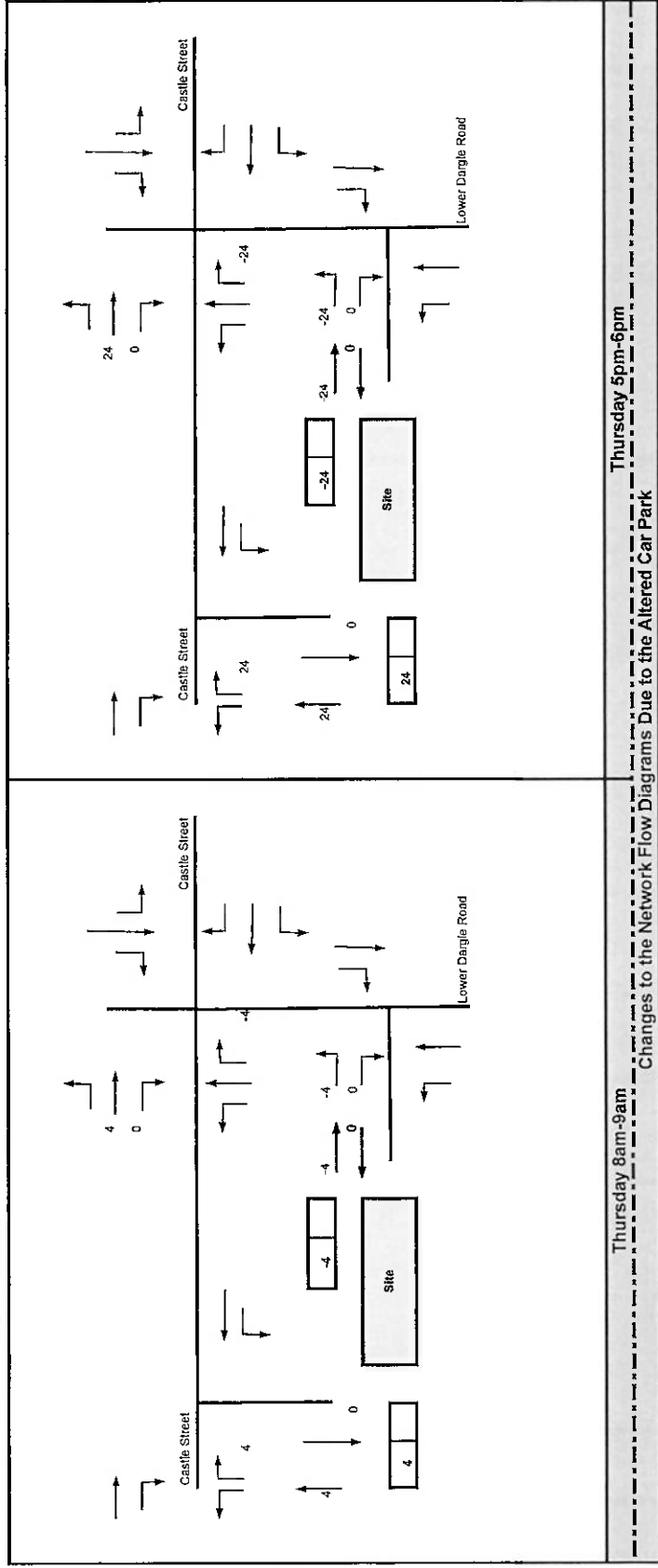
APPENDICES - CONTENT

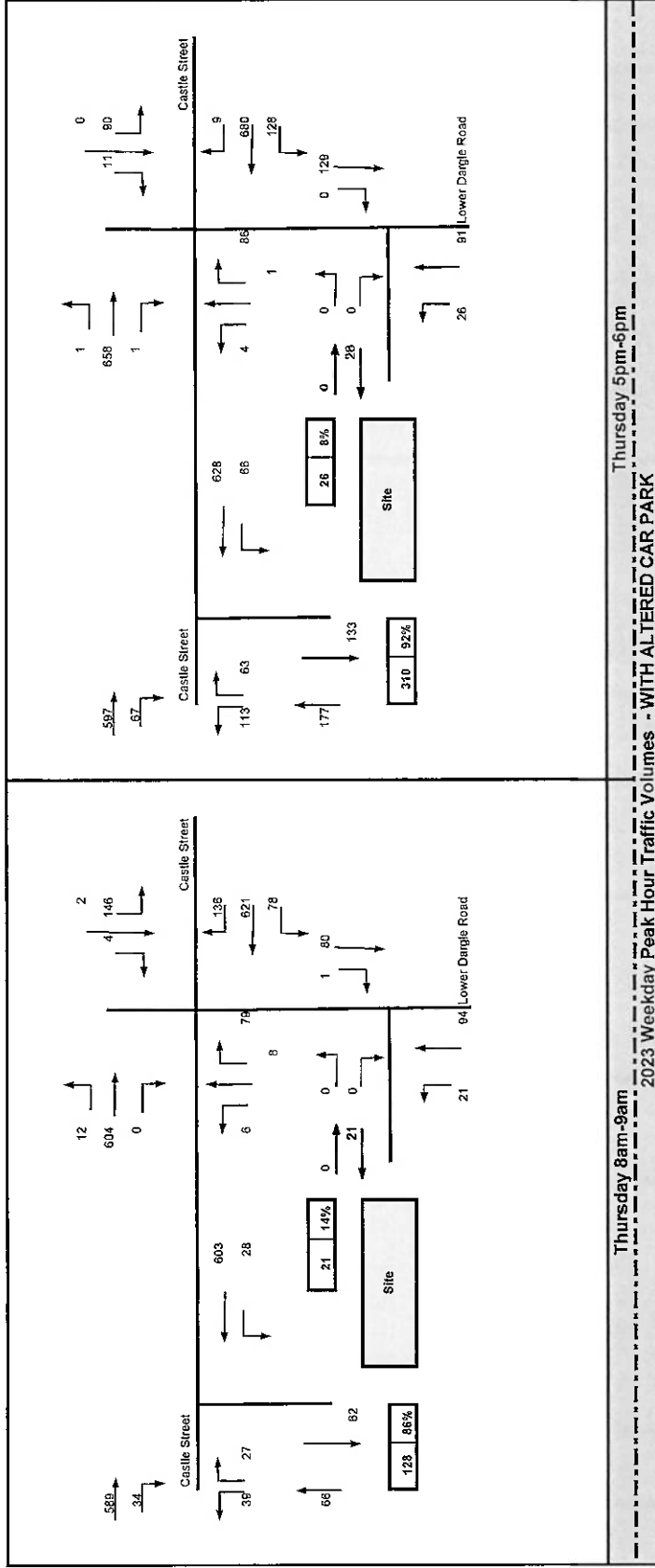
A	Network Flow Diagrams
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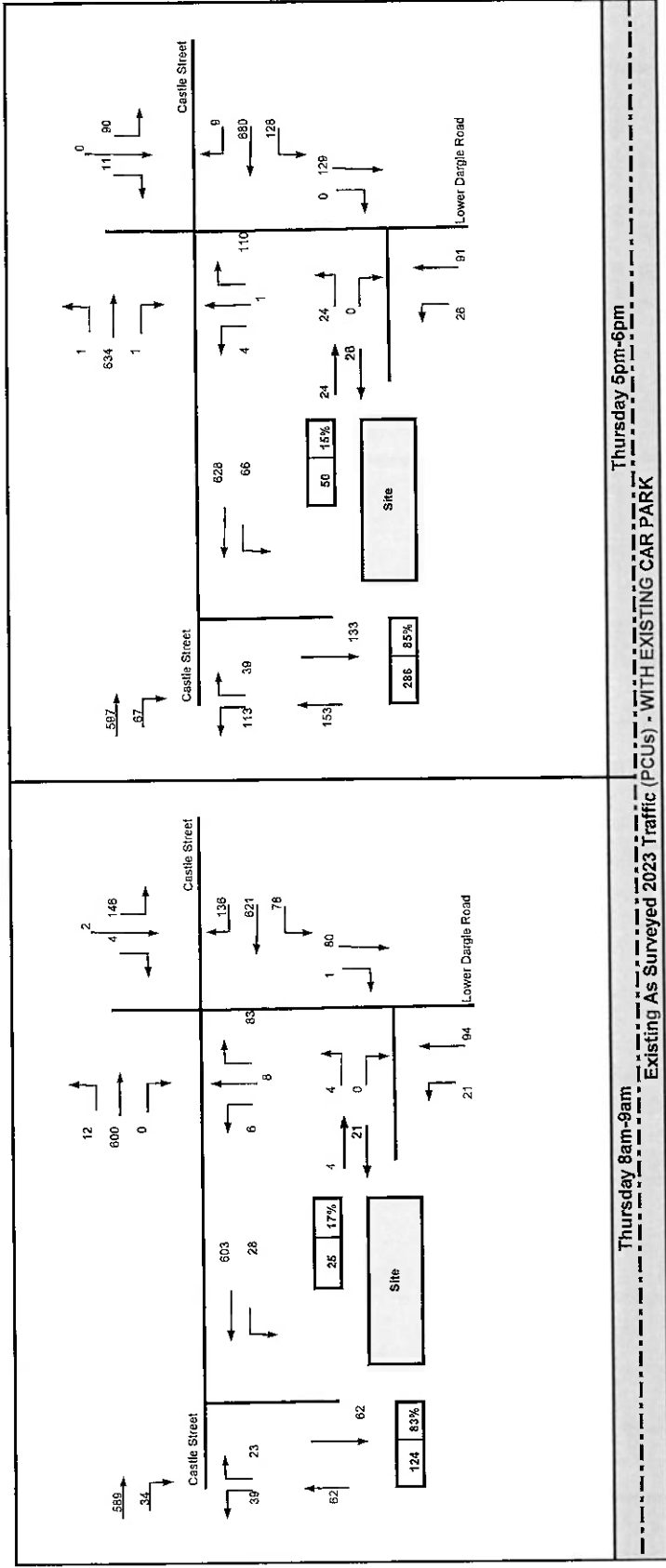
APPENDIX A

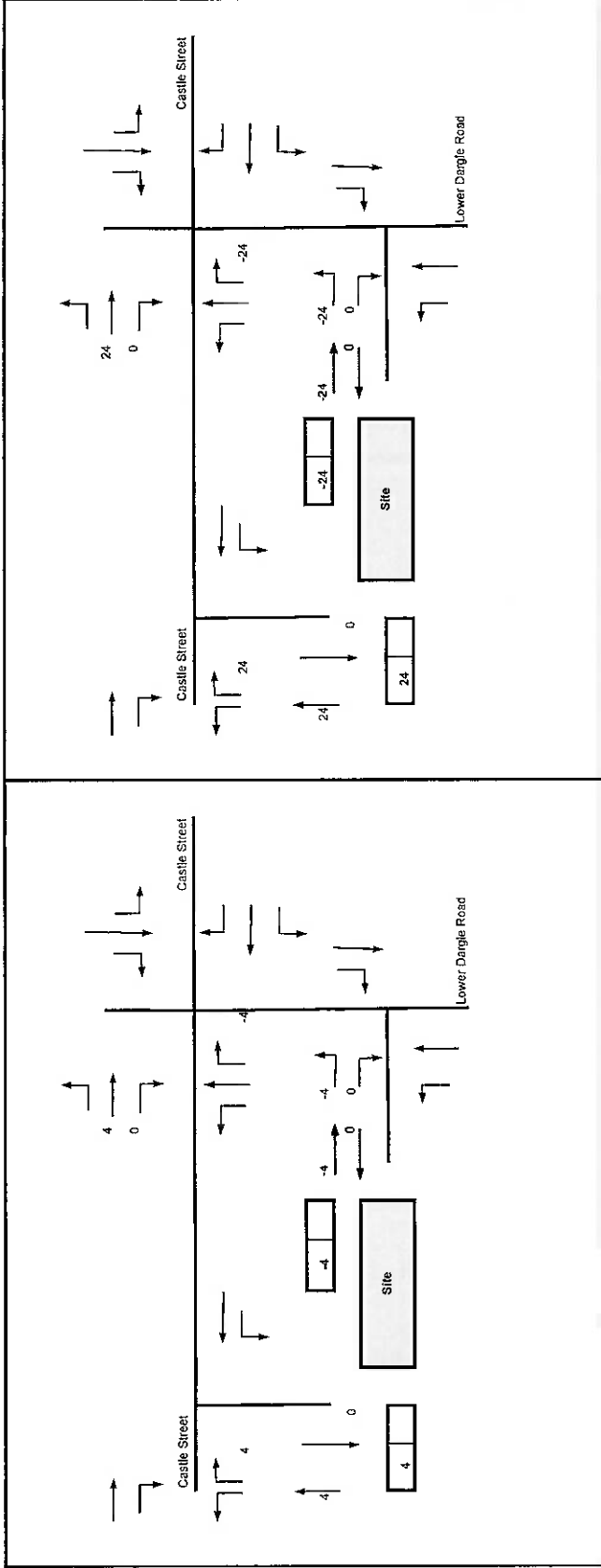
Network Flow Diagrams



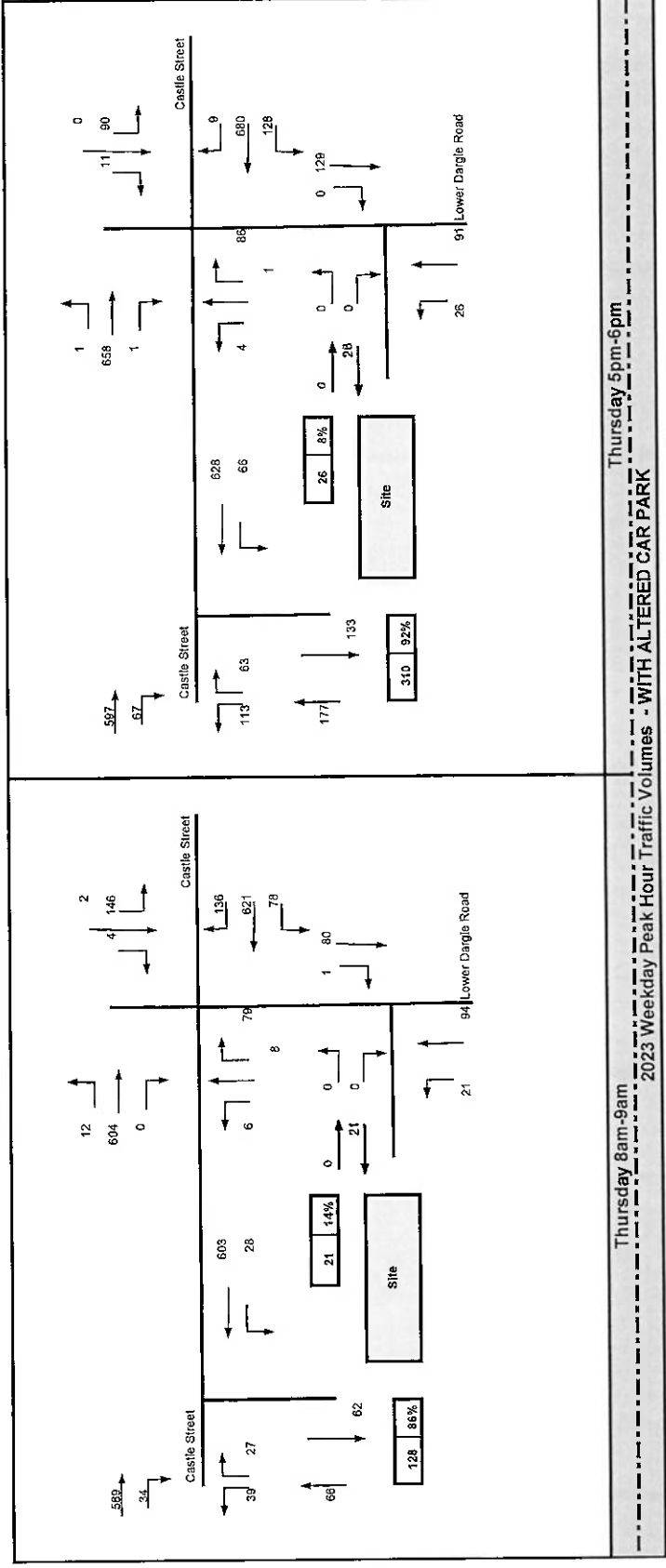


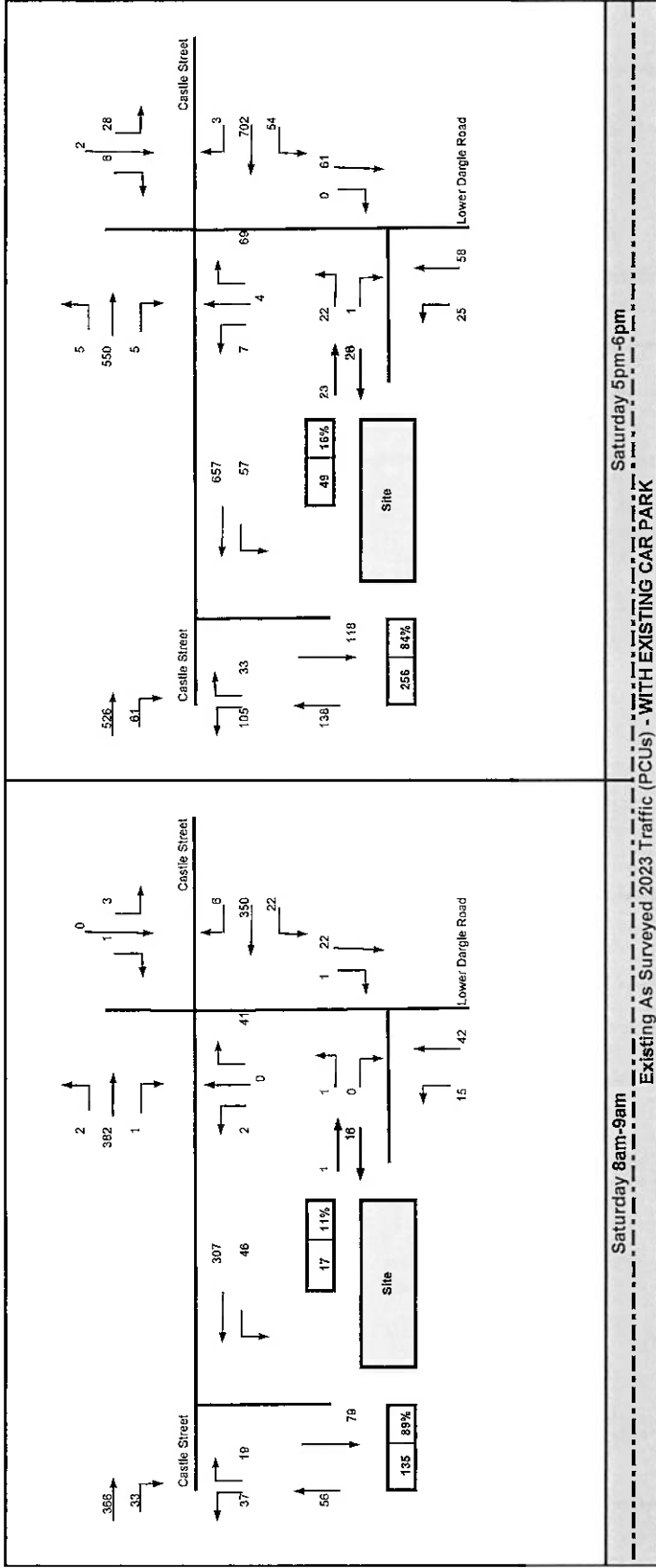


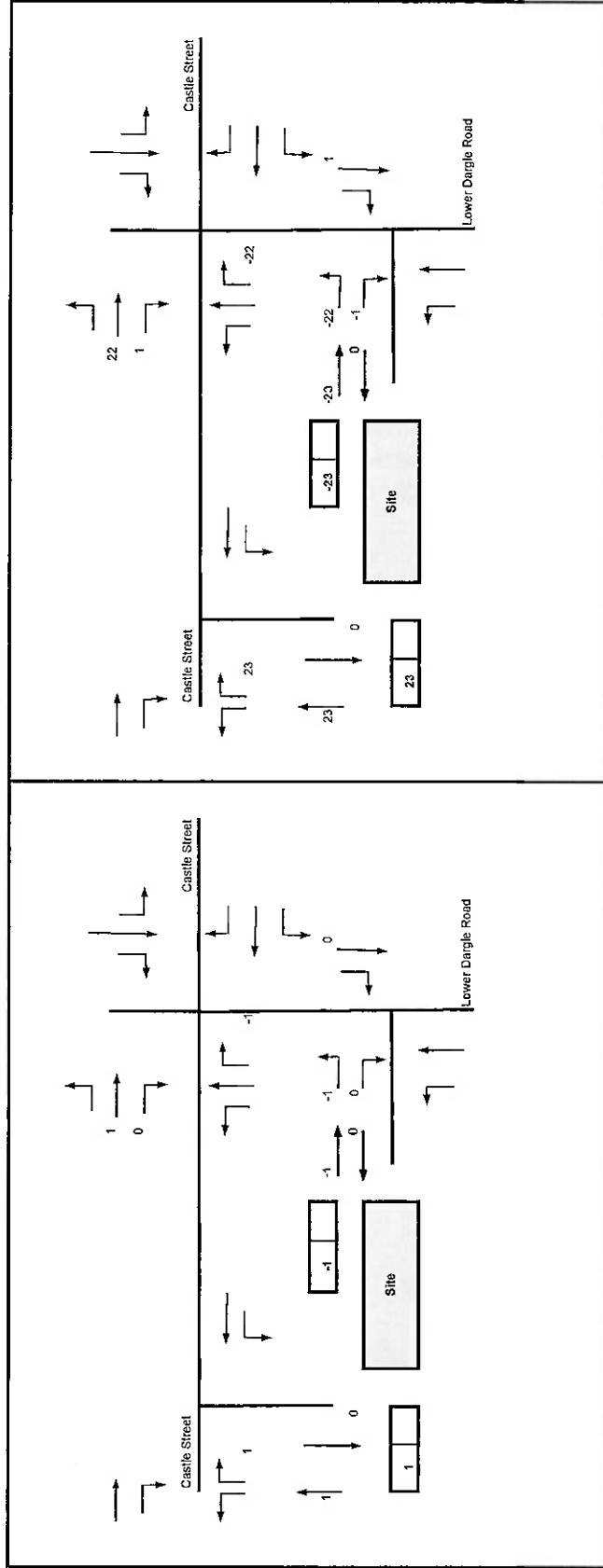




Thursday 8am-9am
 Changes to the Network Flow Diagrams Due to the Altered Car Park
 Thursday 5pm-6pm







Saturday 8am-9am Saturday 5pm-6pm
 Changes to the Network Flow Diagrams Due to the Altered Car Park

