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An Bord Pleanála
64 Marlborough Street,
Dublin 1.
2ND April 2015

An Bord Pleanála Ref: PA 0034

Proposed Alexandra Basin Redevelopment

Reply to Request for Further Information

Attention of Mr. Kieran Somers Executive Officer

Dear Sir

I refer to your request for further information in your letter of 25th February 2015 and set out our reply below.

1.0 Item 1

The Board notes that the proposed demolition of the quay wall at Alexandra Basin will necessitate the removal of an underwater cable (the North Wall-Poolbeg 220kV cable) and the provision of a replacement cable. The Board notes that limited information is presented on what the works involve and the potential implications of these works on the environment and habitats particularly during construction. In this context the applicant is requested to submit a revised EIS, including an assessment of cumulative impacts of these works, and a revised NIS to allow the Board to complete an EIA and AA.

1.1 Response

The issue of the replacement underwater cable was considered in the application, the additional information previously submitted and the written evidence of Dr Alan Barr at the oral hearing and is set out in the attached revisions to the EIS in Section 2.

Initially at the time the application was made there was limited information available on the nature of the works. However, more detail was available when the reply to the previous Request for Further Information was submitted to the Board on the 18th August 2014. By the time of the oral hearing there was sufficient detail available to the consultants for them to reach a conclusion that there would be no potential significant in-combination or cumulative effects arising from the works that would affect the integrity of the European sites. Moreover the works, which involve the removal of an existing cable and the provision of a replacement underground cable, will not give rise to any significant impact on the environment.

Since the holding of the oral hearing, further design work has been carried out by ESB and Eirgrid who are the bodies responsible for the replacement cable and the removal of the existing cable. Based on this work a full description of the proposed works as well as the methodology to be followed in its construction is now available. This description of the design and proposed methodology is set out at Section 14 of the revised EIS, which is submitted by the applicant herewith.

In addition, this information has also been set out in an Appropriate Assessment Stage 1 Screening report attached as Appendix F to the NIS, which has been prepared in relation to the cable replacement project. This screening document was prepared for Eirgrid/ESB. It is included in this submission for the assistance of the Board in conducting its assessment of the potential cumulative impacts of the cable replacement project in combination with the ABR Project.

The potential impacts and the conclusions reached in relation to those potential impacts are set out under the various topic headings in the revisions to the EIS.

The revisions conclude that in relation to the many environmental topics, there will be no significant impacts, whether in combination or cumulatively with the ABR project arising from the installation of the new cable and the de-commissioning of the existing cable.

The revised NIS also considers the likely environmental effects of the cable project and concludes that in combination or cumulatively the project will not give rise to any potential significant effects on any European site.

2.0 Item 2

The proposed development facilitates inter alia, a significant increase in the cruise ship traffic visiting Dublin Port which presents an opportunity to deliver substantially improved integration and connectivity between the Port and the City. Having regard to:

- *The roads/road traffic matters arising which include the closure of a number of existing roads serving the Port, the associated redistribution of traffic within the Port Estate towards Promenade Road and the provision of a signalised junction in lieu of Point Roundabout as well as the provision of a corridor to accommodate a future Eastern Bypass;*
- *The need to accommodate substantial coach traffic to serve cruise passengers, preferably in a high amenity environment, and the associated access/egress, set down and parking arrangements arising from same;*
- *The proposed Conservation Strategy which makes provision for public access to Interpretive Zone 1 and controlled access to Interpretive Zone 2 and the Conservation Zone (Graving Dock No. 1; and*
- *The scope to provide attractive, high quality, pedestrian and public transport links between the Port and the City in view of the site's close proximity to the City Quays and campshires and to the Luas (red line) terminus;*

The Board is not satisfied that the quality of linkage between the proposed development and the City has been adequately demonstrated. The applicant is requested to submit details supported by appropriate drawings, clearly illustrating how it is proposed to improve integration between the proposed development and the City. These details should address in particular the following:

- *Pedestrian connectivity between the Campshire/Quay and Cruise area/ Interpretative zone;*
- *Connectivity between the cruise area and Luas/North Docklands; and*
- *Connectivity for bus traffic to the amenities of the City, which might consider more direct alternatives to the proposed Promenade Road Route.*

2.1 Response

2.1.1 Pedestrian connectivity between the Campshires/Quay and Cruise Area /Interpretive Zone

DPC envisages pedestrian connectivity being achieved between the Campshire/Quay and the Cruise/Interpretive Zone as follows:

- In a visual sense by signalling the presence of a public area and interesting structures thus attracting cruise passengers to visit the area and inducing pedestrian members of the public to cross the road from the Campshires to the Cruise /Interpretive area.
- Directly through physical works by the provision of safe, signalised crossings on East Wall Road.
- By using high quality materials in the public realm areas linking the Campshires to Interpretive Zone 1

Visual Connectivity

The presence of cruise vessels at the berth will provide an attractive visual draw for the public in itself as will the animation created by people movement in an area that is normally associated with goods movement.

As cruise ship calls are seasonal, it was considered important to create a permanent visitor attraction that achieved the twin goals of celebrating the heritage value of the Port and connecting the City and Port across the major road barrier of East Wall Road.

DPC commissioned MOLA Architecture to design such an attraction. Part of the brief to the architects was to create an intriguing visual draw that would attract the cruise passengers and bring them to a point where they would be aware of the accessibility of pedestrian and public transport links to the City Centre and also to attract the public, who are increasingly using the Campshires for recreational purposes (mainly seen at lunchtime and week-ends), to cross into the Port area.

Attached is MOLA Drg. No. 130111-02-9100 which illustrates the interpretive buildings as seen from the Campshires as well as further perspectives of the interpretive buildings with day and dusk views (MOLA Drg. Nos. 130111-02-9101 and 130111-02-9102).

The Board will note the unique building forms which derive from the presentation of the recovered structural block elements from the quay walls as well as the setting within an area landscaped with high quality stone materials and a water pool.

DPC consider that the architects have met the brief admirably and that both cruise passengers and the public will be attracted by the structures to further explore this part of the quayside. The area would also give the public a closer view of the cruise vessels when they are in port.

Physical Works providing Safe Signalised Crossing

The Board will be aware that DPC only controls the lands to its side of the road boundary and that Dublin City Council (DCC) as Roads Authority together with the National Transport Authority (NTA) have responsibility for East Wall Road and the roundabout at the Point/3Arena.

DCC has been actively re-planning the road, pedestrian and cycleway layout on East Wall Road including the elimination of the roundabout at the Point/3Arena and the signalisation of that junction. DCC has recently confirmed in writing to DPC that the necessary funding has been secured and that the works will take place in time to facilitate the intended ABR project works (see attached letter from DCC dated 24th March 2015).

Fig.2.1 below is an extract from the DCC/Arup drawing (Drg. Ref. No.TO100-01) relating to the pertinent section of the improvement scheme at the current Point/3Arena roundabout showing the planned pedestrian crossings.

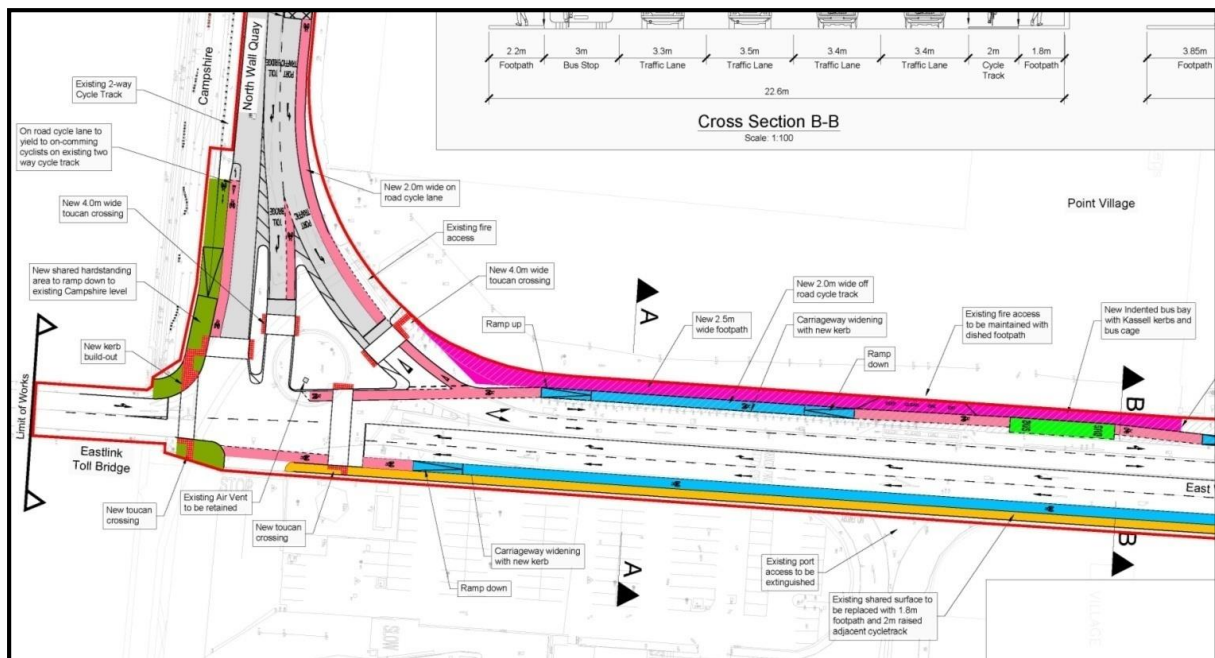


Fig. 2.1

The plan shows a signalised junction in place of the existing roundabout incorporating signalised pedestrian and cycle crossings at the northern side of the East Link Toll Bridge thus creating a direct and safe pedestrian link between the Campshires and the Cruise/Interpretive area.

Also attached are RPS Drgs Nos. IBH0362-RF12-01 and IBH0362-RF12-02 illustrating the proposed cruise passenger connectivity to the Campshire and the Luas. It can be noted that these pedestrian and cycle connectivity proposals are consistent with the application documentation (see Fig. 8.3.11 of Section 8.1 of EIS Volume 1) and the witness statement of Ms Celine Daly of RPS at the Oral Hearing in October 2014.

It is likely that these signalisation works will be finished before the commencement of the ABR project works but certainly before the completion of those works. The connectivity improvements would therefore be in place to accommodate the increase in cruise traffic and the completion of the associated conservation works.

Public Realm Improvements

DPC is prepared to provide funds to DCC to upgrade the quality of the surface finishes within the public realm at this location to create a visual link between the quality finishes at Interpretative Zone 1 of the quayside and the existing Campshires. RPS Drgs. Nos. IBH0362-RF12-01 and IBH0362-RF12-02 show the extent of the area in which the high quality surfaces will be provided (shown hatched in magenta). MOLA Drgs.Nos. 130111-02-2100 Rev AI, 130111-02-2100-1Rev AI, 130111-02-2100-2 Rev AI and 130111-02-2100-3 Rev AI illustrate the detailed manner by which this will be achieved.

The drawings feature granite stone paviors and kerb stones as well as the removal of barriers and redundant signage together with a rationalisation of levels to improve the pedestrian experience, provide wheelchair access and signal the link across East Wall Road. A common design language is created between the Campshires and the Interpretive Zone thus integrating them visually as well as physically.

The gates on the DPC side are being retained as part of the conservation of interesting features in the Port. However, these will be fully opened as previously described in the application on Architectural Drawing No. 130111-2-2100 and Appendix 6 to the Planning Report submitted to the Board entitled *Conservation Strategy for the Alexandra Basin Project- The Design Framework* on page 20 (they can also be opened to a pedestrian width only) to signal the open nature of the interpretive area. (See also MOLA Drg. No.130111-02-9100). This will encourage movement between this area of the Port and the Campshires.

2.1.2 Connectivity between the Cruise Area and Luas/ North Docklands.

The DCC scheme also provides safe direct pedestrian access from the Cruise area to the pavement outside the Point/3Arena and then onto the Luas Terminus and the North Docklands area. (See RPS Drgs. Nos. IBH0362-RF12-01 and IBH0362-RF12-02). The scheme includes the provision of improved signalised pedestrian and cycle facilities and will raise the quality of the cruise passenger experience as passengers walk to the Luas stop. DPC is prepared to fund the upgrading of the surfaces to match those at the Interpretative area/ Campshires up to the Gibson Hotel/commercial complex (see MOLA Drgs. Nos. 130111-02-2100 Rev AI, 130111-02-2100-1 Rev AI, 1130111-02-2100-2 Rev AI and 130111-02-2100-3 Rev AI).

At present, and in the immediate future, the pedestrian desire line from Interpretive Zone 1 to the Luas Terminus is likely to be directly across the existing flagstone and tarmacadam area to the north of the Point/3Arena. If a building is developed in this vicinity sometime in the future as envisaged in the DCC *North Lotts and Grand Canal SDZ Planning Scheme*, the route would skirt around that building.

As the Luas Terminus is located outside the line of vision of those passengers exiting at the quayside, signage will be provided to direct passengers to the Luas (as well as to the City Centre). This can be located within DPC's lands. Rather than add to the existing signs and increase visual clutter, directional signage will be provided in the ground surface, not unlike the signage at the 'Pig Trap' on Sir John Rogerson's Quay. It is illustrated in MOLA Drg. No. 130111-02-2100 Rev AI and highlighted in Fig. 2.2 below.

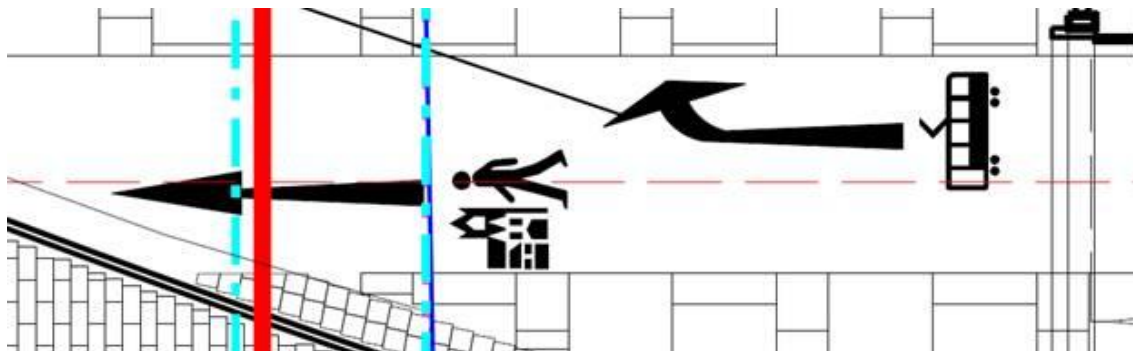


Fig. 2.2

2.1.3 An Integrated Vision

The objective of the improvements at the interface between the Port and City is to contribute to an integrated vision for re-enforcing the connectivity between both areas by

- Using a common design language in the public realm.
- Forming one of a series of linking elements from Custom House Quay to Interpretive Zone 1 and Interpretive Zone 2

These linking elements constitute part of the wider policy by DPC and DCC to re-integrate the City and Port and include individual projects such as the new '*Dublin Ships*' art installations on the Scherzer Bridge at the National

Convention Centre through to the Diving Bell Reconfiguration Project (currently under construction) on Sir John Rogerson's Quay and on to the Interpretive Zones. It will be re-enforced by DCC's two planned additional pedestrian and cycle bridges at Forbes Street and Castleforbes Road (currently the subject of a design tender) as well as the proposed bridge across the mouth of the Dodder. The location of the Luas Terminus close to the Port as well as the recent provision of additional Dublin Bike Scheme Stations throughout Dublin Docklands including a station close to the Point/3Arena facilitates sustainable movement to the Port.

All these initiatives are designed to improve the permeability of the area and encourage the animation of the Quays and connectivity to the Port

MOLA Drg. No. 130111-02-9103 illustrates these elements graphically.

2.1.4 Connectivity for bus traffic to the amenities of the City.

The coach traffic generated by cruise passengers accessing the City Centre will be directed via a route exiting the Port at Alexandra Road. (See RPS Drgs. Nos. IBH0362-RFI2-03 for details of coach routing and IBH0362-RFI2-04 for routing details for taxi/set down and staff vehicles). This would provide a shorter route to City Centre attractions for coaches compared to the Promenade Road route leading to the Dublin Port Tunnel. Coaches will also enter at this location.

It should be borne in mind that cruise passengers will also take coach trips to the Boyne Valley attractions and those in Co. Wicklow and that coaches generally do so via the M50 motorway.

Coaches wishing to access the Dublin Port Tunnel will do so via Promenade Road. However, coaches returning will use the Alexandra Road entry point.

The routing for City Centre coach traffic will have also have the advantage of largely separating it from HGV traffic thus improving the quality of the cruise passenger experience. The DCC scheme for improving East Wall Road does not envisage any vehicular access directly at the cruise vessel berth.

DPC would be happy to accept a condition requiring City Centre passenger coach traffic to use Alexandra Road junction as the main access/exit point in any positive decision by the Board in relation to the proposed development.

As indicated at the oral hearing, the coaches will follow a marshalled route that will be marked out on the existing hard surfaces within the Port area on a temporary basis using painted lines and bollards during the cruise season as shown on RPS Drg. No. IBH0362-RFI2-01.

2.1.5 Connectivity between the Interpretive /Conservation zones

The Board will appreciate the difficulty of public access within a working port where safety and security aspects are paramount. Part of Appendix 6 to the Planning Report submitted to the Board entitled *Conservation Strategy for the Alexandra Basin Redevelopment Project – The Design Framework* details at page 19 the proposed public access. It stated that Interpretative Zone 1 which interfaces with the Campshires would be open to the public and easily accessible through adjacent public access. The other interpretive / conservation zones would be accessible to the public on a pre-arranged, managed and supervised basis. This is because of the above considerations of safety and security and the dispersed location of the interpretive / conservation zones within a busy working port. It is envisaged that interested persons would arrive by arrangement at Dublin Port Centre and be guided and conducted to the areas of interest either on foot or mini-bus. The routing would be flexible, because, as stated at the oral hearing, DPC adjusts routing for goods handling depending on season and the nature of the goods being transported. It does this this by means of temporary road markings, bollards or similar devices (as it does for cruise coaches).

The route from Interpretive Zone 1 to Dublin Port Centre would be by means of the public footpath which will form part of the enhanced DCC scheme.

DPC has a long experience of conducting groups visiting the Port and regularly facilitates visits by public representatives and business, professional, community, student and special interest groups. It also operates an annual 'open day' for the general public. DPC is proficient in conducting such visits and observes strict safety protocols involving:-

- Name-checking and badging
- Supervision by adequate numbers of Dublin Port personnel,
- Access restrictions to hazardous areas
- Supply of safety clothing with 'hi-viz' vests , helmets and footwear

DPC envisages no difficulty in facilitating visits to the conservation / interpretive elements.

2.1.6 Parking Arrangements for coaches

The parking arrangements for the coaches are set out on RPS Drg. No. IBH0362-RF12-05. This drawing is similar to Sketch Drg No. IBH0362/0020, which was tabled at the oral hearing by Ms Celine Daly of RPS. This new drawing shows the set down arrangements for both coach and taxi traffic as well as for parking associated with cruise ships. The area must retain an open character to cater for cargo handling in the cruise off-season given the multi-purpose nature of the new quay. However, the area will be completely clear of such cargo when in use for cruise traffic. The surfaces will be marked, setting out the coach bays, directional routes, taxi locations, parking locations and pedestrian routes.

The surfaces on the new quayside are of a high standard and include coloured tarmac and a linking granite-paved pathway which includes the use of 'way finding' lighting between Interpretive Zone 1 and Zone 2 (that features the restored lighthouse and new stone surround). These are illustrated in the submitted architectural drawings nos. 130111-02-1005, 130111-02-2100 and 130111-02-2101 that accompanied the application and the lighting is referred to on pages 35 and 36 of *Appendix 6-Conservation Strategy for the Alexandra Basin Redevelopment Project, the Design Framework* to the Planning Report. This pathway echoes those found in the Campshires which contain similar granite walkways and 'way finding' lights featuring images of fish and other marine life.

This greatly enhances the environment at this location.

Consideration was given to green landscaping of the area. However, aside from the functional need to maintain the open nature of the quayside, it was considered that this would be out of character with the robust quality of the port environment. In any event, the area's exposed nature, which is subject to salt-laden winds, limits landscaping possibilities. The design continues the aesthetic approach taken in the design of the Campshires which feature trees in areas close to the City Centre but gradually reduces them in number as the Quays take on an open maritime character.

2.1.7 Eastern Bypass

An agreed corridor has been identified for the Eastern Bypass by DCC, the National Roads Authority and DPC. As stated previously in Section 8.1 of the EIS Volume 1 and in Ms Celine Daly's witness statement to the oral hearing, the ABR Project does not compromise the future delivery or operation of the Eastern Bypass and both DCC and the NRA are agreed on this point. It is unlikely that the proposed bypass will proceed during the timescale envisaged for the ABR Project. There is no design available upon which consideration could be given to its interaction with the East Wall Road area.

In any event, there will always be a requirement to maintain pedestrian connectivity between the City and Port and this will no doubt form part of a design brief for any bypass

3.0 Conclusion

The further information now submitted in response to the request for further information issued on the 25th February 2015 complements the very considerable documentation already submitted to the Board on the application for permission in relation to the proposed ABR Project and addresses the issues raised by the Board. The combination of the works proposed by DCC, NTA and DPC to improve pedestrian connectivity to the Campshire and Luas and the proposed revised routing for cruise coach traffic will meet the policies and objectives of DCC and further enhance the sustainable nature of the proposed ABR Project.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Terry Durney', written over a horizontal line.

Terry Durney

Enclosures

- Revisions to EIS.
- Revisions to NIS (including a Screening for Appropriate Assessment Report for decommissioning and replacement of 220kV underground cable as an Appendix to the document).
- Drawings as per RPS Drawing Schedule.
- Drawings as per MOLA Architecture Drawing Schedule.
- Letter from DCC in relation to design improvements to East Wall Road.