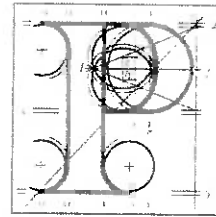


Our Case Number: ABP-316828-23

Your Reference: Woodies DIY



**An
Bord
Pleanála**

RW Nolan
Basement Office
54 Fitzwilliam Square
Dublin 2

Date: 03 April 2024

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

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,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Tuesday 2 April 2024 13:21
To: deirdre@rwnowlan.ie
Cc: robert@rwnowlan.ie
Subject: RE: Woodies Submission- Case No. ABP-318628-23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Deirdre Dunne <deirdre@rwnowlan.ie>
Sent: Tuesday, April 2, 2024 11:43 AM
To: LAPS <laps@pleanala.ie>
Subject: RE: Woodies Submission- Case No. ABP-318628-23

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

Hope you are well. Would it be possible to get a confirmation email that our submission (Woodies Submission – Case No. ABP – 318628-23) was received by An Bord Pleanala.

Kind regards,

Deirdre Dunne
Basement Office
54 Fitzwilliam Square
Dublin 2

Main Office Number: 01 8733627

Email: deirdre@rwnowlan.ie
Website: www.rwnowlan.ie

“Where Planning Meets Property”

RW Nowlan
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Chartered Planning & Property Advisors

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From: Robert Nowlan
Sent: Friday, March 29, 2024 9:56 AM
To: laps@pleanala.ie
Subject: Woodies Submission- Case No. ABP-318628-23

To whom it may concern,

Please find enclosed our client's submission on the Tallaght/Clondalkin to City Centre Busconnect Bus Corridor Scheme following an invitation by An Board Pleanala on the 26th of February 2024

We would appreciate if the Inspector takes into consideration our clients concerns and the major impacts this scheme will have for the Longmile Road Woodies DIY Store.

Regards

Robert Nowlan
BSc(Surv), MPP, MRTPI, MIPI, MSCS, MULI)
Managing Director

No.54 Fitzwilliam Square,
Dublin 2
Phone: 01-8733627
Email: robert@rwnowlan.ie
Website: www.rwnowlan.ie

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Chartered Planning & Property Advisors

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PROJECT NO. 42.03.2024

PLANNING RESPONSE

Submission on the proposed
construction of the Tallaght /
Clondalkin to City Centre Core Bus
Corridor

ON BEHALF OF:

WOODIES DIY, GRAFTON GROUP

MARCH 2024

RW Nowlan & Associates | Basement Office, 54 Fitzwilliam Square North, Dublin 2 | Company Reg. No. 565476 Director- Robert Nowlan | Tel: +353 01-8733627 | info@rwnowlan.ie

1.0 INTRODUCTION

1.1 A submission was made on the proposed 'Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme' on behalf of Woodies DIY. The National Transport Authority (NTA) prepared a report which contains the observations on this and other submissions that were made in relation to the scheme. This submission is in response to the invitation by An Bord Pleanála to make submissions or observations on the report 'NTA Observations on the Proposed Scheme Submissions.'¹ The submission is made on behalf of Woodies DIY, Grafton Group, 2nd Floor, Corrig House, Sandyford Business Park, Dublin 18 D18Y2X6, and WD Dublin Sarl, 2 rue Edward Steichen, Luxembourg, L2540.

2.0 GENERAL

2.1 The submission on behalf of the Woodies DIY store is listed in the report as submission no. 47 and a response to the submission is stated on pages 171-189 of the report. This submission refers to these pages in the report.

3.0 IMPACT OF THE PROPOSED PEDESTRIAN BRIDGE ON DELIVERIES

3.1 The submission on behalf of the Woodies DIY store stated that the proposed pedestrian Bridge and Bridge Ramp will impinge on the ability of EZ Living (as an income-generating sub-tenant to Woodies) to manage its current external delivery & external goods-inwards arrangements.²

¹ NTA Observations on the Proposed Scheme Submissions, September 2023.

² Submission O'Connor Whelan, Planning Consultants, 4/7/23.

NTA Observations on the Proposed Scheme Submissions

3.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is proposed to provide an alternative delivery platform and ramp to facilitate a revised delivery arrangement. The alternative delivery platform and ramp have been incorporated into the Proposed Scheme.³

3.3 The design as envisaged leaves a narrow access lane (6 metre access road for vehicles reversing) which is situated between the footbridge ramp and the façade of the Woodies building. This access lane is not enough to allow vehicles to turn and turning will be necessary in the customer car park to the front of the store. This will result in the loss of car parking spaces and an unsafe practice of turning of delivery vehicles in a customer car park area where pedestrian movements occur. The NTA alternative proposal for delivery vehicle access is unworkable and the widths proposed are inadequate.

4.0 IMPACT OF THE PROPOSED PEDESTRIAN BRIDGE ON VISIBILITY OF THE STORE

4.1 The submission on behalf of the Woodies DIY store stated that the proposed pedestrian Bridge and Bridge Ramp will impinge on the visibility of the end of the building for both Woodies and EZ Living.⁴

4.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is stated that: ...”the area is considered to be of low landscape and visual significance and sensitivity. The existing Woodies DIY building is visually prominent in views. The proposed elevated bridge is a significant structure and it will also be a visually prominent feature at this junction location. However, given the existing context the proposed bridge will not result in an adverse townscape or visual impact on the area, and it will not significantly affect the visibility of the Woodies DIY building.”⁵

4.3 The photomontage shown in fig. 2.6.4.13 shows the impact on the visibility of the Woodies store after construction of the footbridge from a viewpoint to the northeast of the road junction.⁶ Apart from the fact that the image illustrates the significant visual impact of the proposed footbridge itself on the

³, September 2023, p. 176.

⁴ Submission O’Connor Whelan, Planning Consultants, 4/7/23.

⁵ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 179.

⁶ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 179.

streetscape, the more serious impact will be in views from the southeast of the junction as the ramps to the footbridge are directly placed in front of the façade of the Woodies building facing the Naas Road.

4.4 It is acknowledged in the report that the Woodies building is a ...“visually prominent structure”.⁶ The visual prominence is enhanced by a circular advertising structure which acts as a prominent feature at this large scale road infrastructure junction. The building including this advertising feature significantly adds to the spatial definition of the sprawling road infrastructure at this location which is a landmark gateway junction for Dublin City. It is submitted in the report that ...“the baseline townscape is of low / medium sensitivity” and that ...“the streetscape character is composed of a large dual carriageway junction with low sensitivity.”⁷ This is a misinterpretation of the character of the Naas road commercial development which is characterised by large scale buildings with feature elements that help to mark the landscape. While this landscape is visually different to a more fine grain urban landscape, it is nonetheless of importance and value in defining the corridor of commercial premises along one of the main entrance roads into Dublin City. This visual quality is severely impacted in a

negative way by the proposed footbridge with accompanying ramps as is clearly illustrated in the figure shown. It is considered that the proposed pedestrian Bridge and Bridge Ramp will impinge on the visibility of the Woodies and EZ Living buildings and the visual quality of these buildings and surrounding streetscape of the Naas road corridor into Dublin City.

5.0 IMPACT OF THE PROPOSED PEDESTRIAN BRIDGE ON POTENTIAL VANDALISM

5.1 The submission on behalf of the Woodies DIY store stated that the proposed pedestrian Bridge and Bridge Ramp may result in vandalism/damage to large glazing panels and the stores in general arising from the elevated position of the proposed footbridge.⁸

⁶ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 178.

⁷, September 2023, p. 178.

⁸ Submission O'Connor Whelan. Planning Consultants, 4/7/23.

5.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is stated that having regard to the distance to the glazed panels fronting onto the Nangor Road (ca. 18.5 m) and the enclosed nature of the footbridge, there will be no risk of vandalism or damage to the large glazed panels.⁹

5.3 The response by the NTA focuses exclusively on the glazed panels facing the Nangor Road frontage and fails to refer to the large area of laminated shop front façade on the Naas Road (south eastern) frontage of the building. The footbridge and ramps structures will be close to this façade. While the bridge spans may be fully enclosed it is not clear whether this is also the case for the ramps to the footbridge. Concerns remain about the potential impact of the bridge and ramp structure in front of the Woodies store building in terms of vandalism and anti-social behaviour.

6.0 INSUFFICIENT PROVISION FOR SITE ACCESS DURING CONSTRUCTION WORKS

6.1 The submission on behalf of the Woodies DIY store stated that the proposed NTA land take makes insufficient provision for site access, offload and storage of materials, or traffic management during the course of works.¹¹

6.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is stated that ... "the extent of the temporary land is necessary to complete the construction works at this location"¹⁰ and

that ... "The NTA will liaise with Woodies DIY Limited as the scheme progresses to refine any agreed access arrangement to maintain the operation of the locations."¹¹

6.3 It is relevant to note that the temporary land acquisition comprises a narrow strip of land between the proposed retaining wall and the existing façade of the Woodies building. Concerns remain that the

⁹ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 183. ¹¹ Submission O'Connor Whelan, Planning Consultants, 4/7/23.

¹⁰, September 2023, p. 184.

¹¹ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 188.

proposed temporary land acquisition area may not be adequate for safe access & egress, plus site operations, without further encroachment on land surrounding the Woodies building.

7.0 NEED FOR PROPOSED PEDESTRIAN FOOTBRIDGE

7.1 The submission on behalf of the Woodies DIY store stated that no information has been provided justifying a bridge project of this scale in terms of its proposed use, benefit to the public at large, or its cost.¹²

7.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is stated that the proposed footbridge will provide the following advantages for pedestrians and cyclists¹³:

- It provides a more reliable and direct crossing facility for pedestrians and cyclists.
- It improves significantly the safety of pedestrian and cyclists.
- It will make for a significantly more pleasant journey for pedestrians and cyclists using the junction.

7.3 While it is acknowledged that the junction is a complex road junction, it should be noted that the proposed bridge structure would require cyclists to following the ramp structures resulting in a significantly longer distance plus need to cycle up the slope of the ramps. In practice, it is unlikely that cyclists would follow this route and it is more likely they will prefer to follow existing routes along the road using crossing points at different locations around the road junction. Pedestrians also tend to prefer direct desire lines rather than footbridge routes which require longer walking distances along the ramp structures. It is not accepted that the traffic light arrangements necessarily need to result in long delays for pedestrians and cyclists if the traffic lights give equal priority to cars and HGVs vs. pedestrians and cyclists or even preferential treatment for the slow traffic modes. There is a

¹² Submission O'Connor Whelan, Planning Consultants, 4/7/23.

¹³, September 2023, p. 188.

significant risk that the footbridge will become a ‘white elephant’ and it is noted that elsewhere in the city well intended footbridges tend to be removed in favour of traffic light arrangements.

8.0 CONCLUSION

- The NTA alternative proposal for delivery vehicle access is unworkable and the widths proposed are inadequate.
- The proposed pedestrian Bridge and Bridge Ramp will impinge on the visibility and visual quality of the Woodies and EZ Living buildings.
- Concerns remain about the potential impact of the bridge and ramp structure in front of the Woodies store building in terms of vandalism and anti-social behaviour.
- Concerns remain that the proposed temporary land acquisition area may not be adequate for safe access & egress, plus site operations, without further encroachment on land surrounding the Woodies building.
- There is a significant risk for Woodies of losing an important concessionaire at this strategic location occupying a significant portion of the overall building. Woodies would welcome continued engagement by NTA re the impacts on the overall store and EZ living in particular.
- There is a significant risk that the footbridge will become a ‘white elephant’ and it is noted that elsewhere in the city well intended footbridges tend to be removed in favour of traffic light arrangements. A proper assessment of the real need for this overbridge is required and is currently lacking in the documentation.
- The concerns by Woodies expressed in this submission can be removed by omitting the proposed footbridge structure with accompanying ramps. An Bord Pleanála is urged to include in any decision to grant approval for the proposed bus corridor a condition that requires the omission of the proposed footbridge in favour of traffic lights for pedestrian and cyclists.