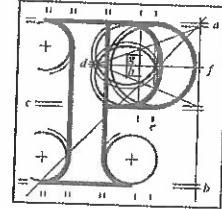


Our Case Number: ABP-313182-22
Planning Authority Reference Number:
Your Reference: Tesco Ireland Limited



**An
Bord
Pleanála**

Avison Young
2-4 Merrion Row
Dublin 2

D02 WP23

Date: 15 June 2022

Re: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme
County Dublin

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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 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).

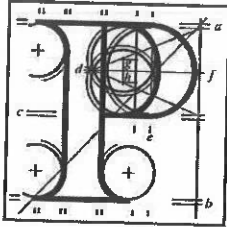
Yours faithfully,

Kevin McGettigan
Administrative Assistant
Direct Line: 01-8737263

BL50A

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoibhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



**An
Bord
Pleanála**

SID Online Observation

Online Reference: (SID-OBS-000079)

Online Observation Details

Contact Name:	Muirenn Duffy
Lodgement Date:	02/06/2022 14:04:23
Case Number / Description:	313182

Payment Details

Payment Method:	Online Payment
Cardholder Name:	Muirenn Duffy
Payment Amount:	€50.00

Your Ref: ABP Ref. No. 313182-22

2nd June 2022

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Dear Sir/Madam,

RE: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme County Dublin
An Bord Pleanála Ref. No. 313182-22

We, Avison Young, have been retained by our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, County Dublin to prepare this submission in relation to the lodgement of the BusConnects Clongriffin to City Centre Core Bus Corridor Scheme by the National Transport Authority (hereafter 'NTA').

The payment of €50, being the appropriate fee for making a submission, has been made online. Please note that all correspondence in relation to the observation should be sent to the Agents, Avison Young, 4th Floor, 2-4 Merrion Row, Dublin 2. We would request that An Bord Pleanála (hereafter 'ABP') keep us informed of any updates relating to this application.

The retail sector makes a major contribution to Dublin City and its suburbs, by increasing the vitality and viability of its urban settlements and villages, and acts as an economic anchor, creating significant employment and indirect economic and social activity. Having regard to this, we welcome this opportunity to engage with the NTA and ABP in respect of the preparation of the BusConnects Scheme.

Cyclist Safety & Highway Capacity

Tesco Ireland Limited (hereafter "Tesco") welcomes the proposed investment in public transport, active travel and the urban environment of Dublin. It is considered that the proposed BusConnects Scheme will greatly improve the way in which Dublin City functions from an economic, social and environmental perspective.

With regards to the Clongriffin to City Centre route, Tesco currently has 1 no. store along this route, at the Clarehall Shopping Centre.

HGV's regularly use this junction at the entrance to the centre as it is the only access point for the delivery of goods. Tesco is keen to ensure that HGV's can continue to access the retail centre in a safe manner. Therefore, it is requested, when an HGV is turning left to access the retail centre that

all cyclists should be held at the red light due to a potential lack of visibility of a cyclist, even when in the segregated cycle lane.

In addition to the above, there are also concerns regarding the highway capacity and the accuracy of the modelling output included within this application. We would refer to the enclosed submission provided by Pinnacle Consulting Engineers which addresses these items in more detail (please refer to Appendix I).

Conclusion

Tesco fully acknowledges and welcomes the need to improve the accessibility of our city in line with our European counterparts. In this regard, the NTA's investment in sustainable transport to improve the urban environment of Dublin City and its suburbs is welcomed, however, we ask that the importance of daily servicing, accessibility and cyclist safety not be overlooked.

We trust that the commentary and points raised in this submission will be considered by An Bord Pleanála in the assessment of this application. Should you have any queries on the above then please do not hesitate to contact us.

Yours faithfully



Muirenn Duffy
Associate Director
+353 (0)1 5719911

muirenn.duffy@avisonyoung.com

For and on behalf of Avison Young Planning and Regeneration Limited

Appendix I - Letter prepared by Pinnacle Consulting Engineers

Bus Connects

National Transport Authority
Dun Sceine,
Harcourt Lane
Dublin 2
D02 WT20

01 June 2022

Reference: PE22-039

To Whom it May Concern

RE: Bus Connects - Clongriffin to City Centre Clarehall Shopping Centre

On behalf of Tesco Ireland Ltd, please find below observations relating to the Bus Connect proposals at Clarehall Shopping Centre as part of the Clongriffin to City Centre upgrade.

The observations relate to the following:

1. Cyclist safety
2. Highway capacity

Cyclist Safety

There is one access route to the proposed development which caters for customers, residents, visitors and deliveries to the various land uses located on site. Deliveries will include rigid and articulated heavy goods vehicles.

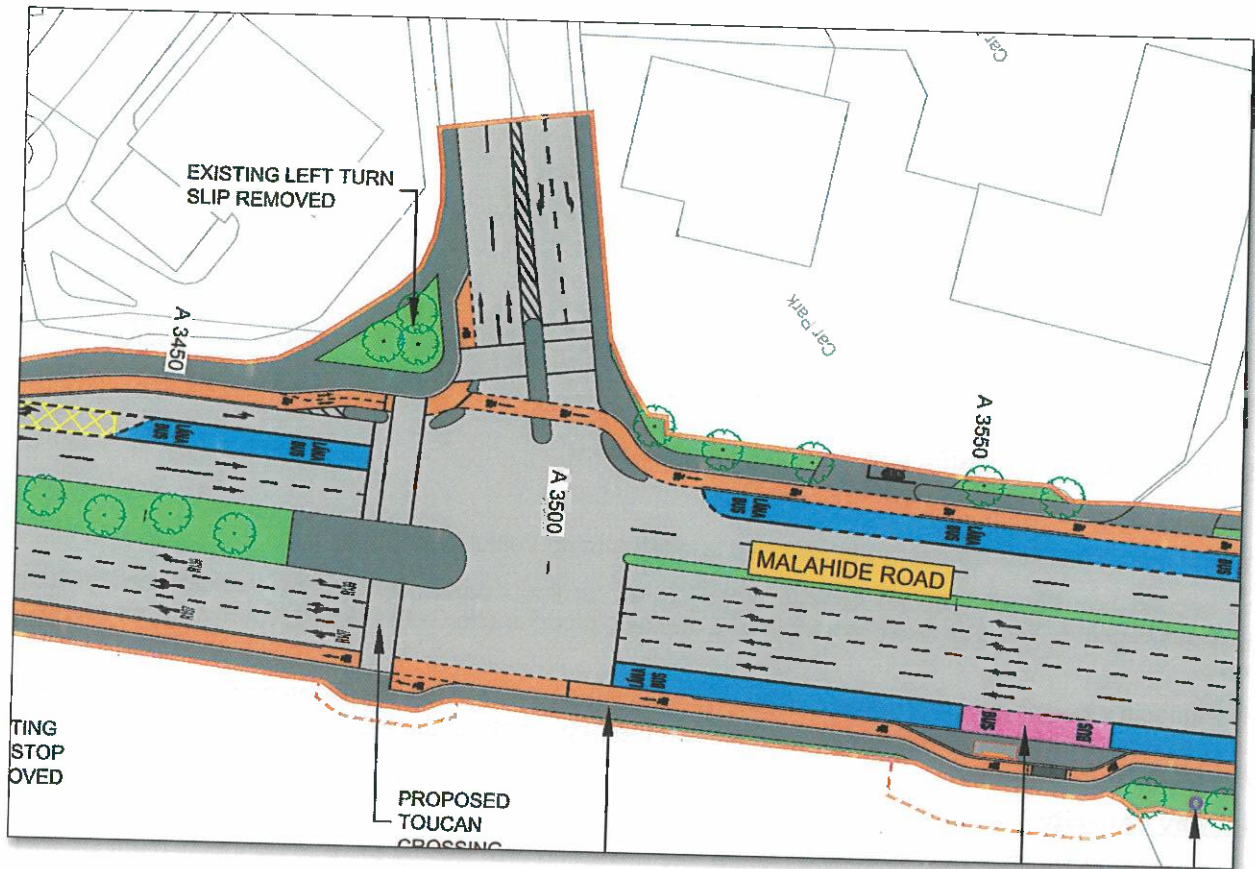


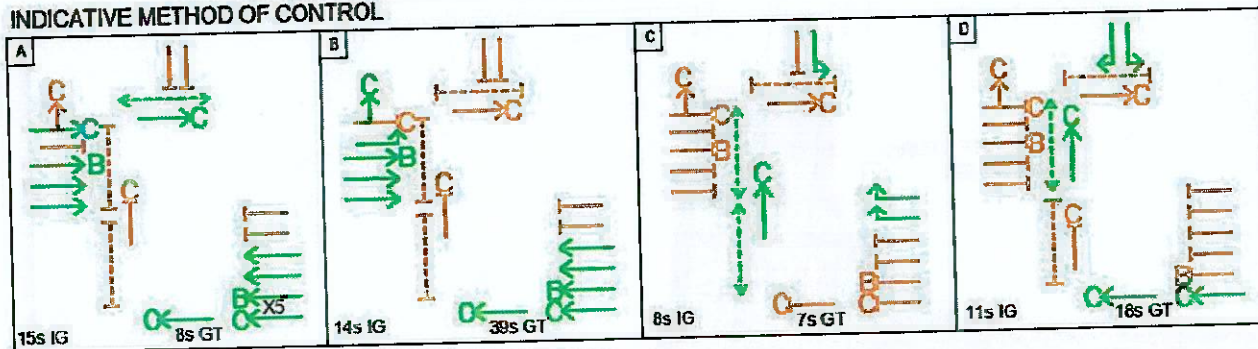
Figure 1 General Layout

No tracking information has been provided to demonstrate that these vehicles can be accommodated safely at this location noting the potential impact that the swept path can have on cyclists, pedestrians and other vulnerable road users.

The Bus Connects team is asked to provide a swept path analysis for the maximum sized HGV permissible from all approaches to/from the development using all lanes available. Of particular concern is HGVs approaching from the west and turning into the development. The Bus Connects team are asked to demonstrate that the swept path of an approaching HGV can turn from Malahide Road into Clarehall Shopping Centre while maintaining its lane and note the potential oversailing of the kerbs provided for cyclists' protection.

Based on the provided Traffic and Transport Assessment, there will be a mix of left turning cyclist and left turning vehicles. Left turning movements will be segregated from inbound movement. This is illustrated in the phase diagram below.

INDICATIVE METHOD OF CONTROL



X5 denotes Advance 5 seconds Start for Cyclists and Buses

Figure 2 Extract from Traffic and Transport Assessment

The first box shows left turning cyclist stopped and left turning vehicles stopped.

The second box shows inbound cyclists stopped, left turning cyclists, left turning vehicles and in bound cars/busses going. The safety of this should be assessed in conjunction with the swept path analysis requested above.

It is Pinnacle's suggestion that when a truck is turning left that all cyclists should be held. The reason for this is due to a potential lack of visibility of a cyclist and the swept path of the HGV even when in the segregated cycle lane.

Highway Capacity

At the access to the Clarehall Shopping Centre, the modelling provided by the Bus Connects team shows the junction with a PRC of 135.3% (AM) and 96.3%(PM). This is contrary to what is experienced on site as reported by centre management particularly during retail peak periods i.e., weekends.

The Traffic and Transport Assessment does not state what calibration was used to determine the accuracy of their model. The following information, as a minimum, is lacking:

- Geometric survey
- Signal timings
- Queue lengths

Anecdotally, and based on feedback from centre management, there is significant queuing on all arms of the junction during the retail peak periods. Note, that the retail peak may not coincide with the network peak. This should be assessed as part of the next iteration of the junction modelling.

The model should be validated based on queue lengths observed on site. Calibration is the iterative process of comparing the model with the system i.e., revising the model if necessary, comparing again, until a model is accepted (validated). Validation is a process of comparing the model and its behaviour to the real system and its behaviour. This data should be collected for both the network peak and the retail peak periods.

Without a calibrated model, it is therefore difficult to assess the accuracy of the modelling output.

Should you have any questions or comments on the above, please do not hesitate to contact me.

Yours sincerely,

PINNACLE
CONSULTING ENGINEERS



Ronan Kearns

Pinnacle Consulting Engineers

ronan.kearns@iepinnacle.com

+353 1 2311045