

An Bord Pleanála

McGill Planning Limited 22 Wicklow Street Dublin 2 D02 VK22

Date: 22nd July 2022

Re: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme

Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission on behalf of your client in relation to the abovementioned proposed road development and will take it into consideration in its determination of the matter. As your client is listed on the Compulsory Purchase Order schedule, no fee is required.

A refund of €50 will issue to the debit/credit card used to make payment.

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.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield / Executive Officer

Direct Line: 01-873 7287

HA02A

Email

Rock Road, Blackrock Co. Dublin, A94 E4X7

blackrock-clinic.com info@blackrock-clinic.com

Tel + 353 1 283 2222



An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902

Re:

Belfield/ Blackrock to City Centre Core Bus Corridor Scheme

Website:

https://belfieldblackrockscheme.ie/

Ref No:

313509 - LA ROAD DEV- APPLICATION

Description:

Belfield/ Blackrock to City Centre Core Bus Corridor Scheme

Applicant:

National Transport Authority

Lodged:

6th May 2022

Ref No:

313565 - Local Authority Road CPO- Application

Description:

Compulsory Purchase Order Bus Connects Belfield/ Blackrock to City

Centre Core Bus Corridor Scheme

Applicant:

National Transport Authority

Lodged:

13th May 2022

For both

Observation:

Blackrock Health, Blackrock Clinic, Rock Road, Blackrock, Co. Dublin

Agent: McGill Planning, 22 Wicklow Street, Dublin 2

Date of Submission: 11th July 2022

Dear Sir/ Madam,

Introduction

Blackrock Health, Blackrock Clinic, Rock Road, Blackrock, Co. Dublin, wish to make this observation on the Strategic Infrastructure Development Application and the Compulsory Purchase Order for **Belfield/Blackrock to City Centre Core Bus Corridor Scheme 2022.** Reference numbers for both are set out above.

While Blackrock Health and Blackrock Clinic support the principle of BusConnects, we wish to make an objection with regard to the extent of land take propose for use in the planning application and to be compulsory purchased which will have a direct and detrimental impact on the operation of the Clinic and Hospital. This objection is made within the time period set out on the statutory notices which requires submission to be made to the Strategic Infrastructure Division of An Bord Pleanála between the 17th May and the 12th July 2022.

BLACKROCK HEALTH BLACKROCK CLINIC

The Compulsory Purchase Orders dated May 12th, 2022, listed below which have been served by the National Transport Authority (NTA) in connection with the:

Entity	Plot List	Lands Being Permanently Acquired (ha)	Lands Being Temporarily Acquired (ha)
Blackrock Group Services Unlimited Company	1019(1).1i 1019(2).2i 1019(3).2i	0.04605	0.01448 0.03061
Blackrock Hospital Ltd	1019(1).1i 1019(2).2i 1019(3).2i	0.04605	0.01448 0.03061
Kingwater Development Company Unlimited Company	1019(1).1i 1019(2).2i 1019(3).2i	0.04605	0.01448 0.03061
Hestow Unlimited Company	1019(1).1i 1019(2).2i 1019(3).2i	0.04605	0.01448 0.03061
Blackrock Clinic Unlimited Company	1020(1).1i 1020(2).2i	0.01123	0.02296

All of the named entities on which Notices have been served are companies within the Blackrock Health group (BH) and thus for the purposes of this correspondence we have referenced the objection using the group name BH.

BH support the principal of the Bus Connects project, however we object to all of the above listed Compulsory Purchase Orders and to the Planning application for the following reasons:

- The extent of lands to be acquired, both on a permanent and temporary basis, is in our view excessive.
- 2. The extent of lands to be acquired, both on a permanent and temporary basis, will have significant impacts on the day to day operation of Blackrock Clinic.
- The proposed Bus Connects scheme has not taken cognisance of the proposed relocation of the vehicular and pedestrian access from Rock Road to Blackrock Clinic nor the potential future expansion of the Clinic.
- 4. All of the proposed development is to the south side of the Rock Road, impacting on these land owners and having a considerable visual impact through the removal of several mature trees within the Blackrock Clinic site, as well as established boundaries, entrances and planting
- The proposal will also impact on the utilities and services for Blackrock Clinic. This is a critical issue requiring a phasing plan, notification and agreement with Blackrock Clinic prior to any works to utilities being undertaken.

It is therefore respectfully requested that should an approval of the proposed planning application and CPO application be forthcoming that it is subject to a condition requiring that Bus Connects is delivered in line with the attached DBFL Drawings and that the lands acquired on a temporary and permanent basis is reduced significantly.

BLACKROCK **HEALTH**

BLACKROCK CLINIC

The attached report prepared by our planning consultants, McGill Planning, expands on each of the above reasons.

Finally, we enclose the correct to accompany the objection.

Please do not hesitate to contact to contact us should you have any further queries about this observation.

Kindly acknowledge receipt of this objection.

Yours sincerely

JAMES O'DONOGHUE

CHIEF EXECUTIVE



OBJECTION LETTER

IN RESPECT OF

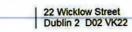
THE BELFIELD/BLACKROCK TO CITY CENTRE CORE BUS CORRIDOR SCHEME COMPULSORY PURCHASE ORDER 2022 AND PLANNING APPLICATION

ON BEHALF OF

BLACKROCK HEALTH, BLACKROCK HOSPITAL AND CLINIC

PREPARED BY







Tel +353 1 2846464 Email info@mcgplanning.le



1 INTRODUCTION

The purpose of this submission is to set out the reasons for the objection to Planning Application and the Compulsory Purchase Order Application (which are listed in the cover letter accompanying this submission) served by the National Transport Authority (NTA) on the Blackrock Health (BH) group of companies in connection with the Belfield/ Blackrock to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022.

The Proposed Scheme which has a total length of approximately 8.3km and is comprised of two main alignments in terms of the route it follows, namely: Blackrock to City Centre route and Nutley Lane route.

It is the Blackrock to City Centre section of the Proposed Scheme which is the subject of the objections. This section of the alignment relates to the R113 at Temple Hill, approximately 80m to the north of the R827 Stradbrook Road, traveling along the N31 Frascati Road, the R118 Rock Road / Merrion Road / Pembroke Road, the R816 Pembroke Road / Baggot Street Upper / Baggot Street Lower, turns onto Fitzwilliam Street Lower and terminates at the junction of Mount Street Upper / Merrion Square South / Merrion Square East. The An Bord Pleanála planning application reference No for the Proposed Busconnects Scheme is 313509 and for the CPO Application is 313565.

Figure 1 presented below illustrates the overall relevant BH land holding.

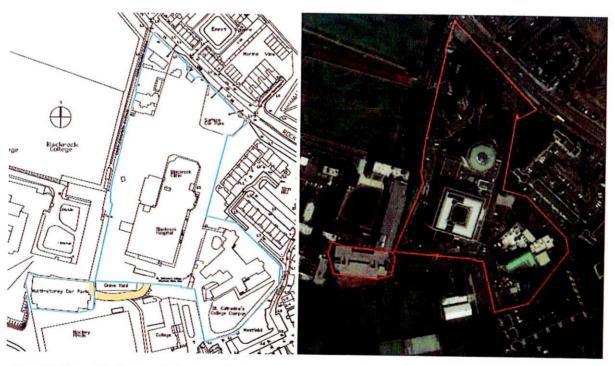


Figure 1 outline of Blackrock Health's land holding



2 BACKGROUND

Blackrock Clinic and Hospital is now part of the Blackrock Health private hospital group together with the Hermitage Clinic, Galway Clinic and Limerick Clinic, comprising some of the most advanced hospitals within Irish private healthcare.

While Blackrock Health and Blackrock Clinic support the principle of the BusConnects project they object to the extent of land to be proposed as part of the planning application and to be acquired through the CPO which will have a direct and detrimental impact on the operation of Blackrock Clinic and Hospital (hereinafter referred to collectively as Blackrock Clinic). This objection is made within the time period set out on the Statutory Notices which requires submissions to be made to the Strategic Infrastructure Division of An Bord Pleanála between May 17th and July 12th, 2022.

Blackrock Clinic is an ever-evolving medical centre offering a range of services such as high-tech surgical procedures, medical treatments, and ground-breaking diagnostics. It is the leading and longest established private hospital and clinic in Ireland. Since its opening in the mid 1980's, Blackrock Clinic has consistently built an unparalleled reputation in new high-tech surgical procedures, medical treatments and ground-breaking diagnostics. This reputation has led to some of the best international and national consultants working at Blackrock Clinic.

Patient outcomes at Blackrock Clinic are very positive with many outcomes outstripping international standards. Blackrock Clinic follow the progress of patients from the beginning of their journey. The Hospital is also the first to provide treatment in single patient rooms, thus reducing the risk of hospital acquired infections.

Blackrock Clinic has been recognised for twenty years by the Joint Commission International (JCI) which accredits only hospitals that raise safety and quality of care standards to the highest levels. Blackrock Clinic was one of the first in Ireland to attain this international recognition. Blackrock Clinic is a progressive and pioneering hospital in which care for the patient is central to all actions.

3 REASONS FOR OBJECTION

3.1 Excessive Extent of Lands to be Acquired

The BusConnects proposals identify lands to be both permanently and temporarily to be used and acquired for the delivery of the scheme. It is the design team's view that the extent of the lands required both a permanently and temporarily basis is in excess of what is needed to deliver the BusConnect along the Rock Road adjacent to Blackrock Clinic and far less is actually needed to deliver BusConnects. However, the land take proposed will have a detrimental impact on the operation of the Blackrock Clinic.

Blackrock Health has met with the NTA on multiple occasions regarding BusConnects since November 2020 up to and including July 2022. These meetings was discussed the needs of Blackrock Clinic, the masterplan of the site as a whole and the aim to move the access points. It is therefore concerning the quantum of land that is being proposed in both the planning application and in the compulsory purchase order application.



3.1.1 Impacts on Glenalla and Seafort Buildings

As part of the Proposed Scheme, it is proposed to acquire Plot Reference 1020(1).1i (permanent acquisition) and Plot reference 1020(2).2i (temporary acquisition) which adjoin the Glenalla building and owned by BH. Figure 2 presented below is an extract from the CPO map served in respect of these lands showing the extent of the proposed land acquisition.

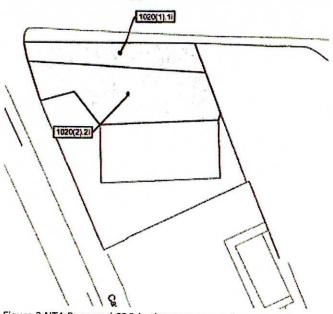


Figure 2 NTA Proposed CPO both temporary and permanent

The temporary land take will result in the loss of c. 7 parking spaces as well as the complete inaccessibility of the Glenalla Buildings. In the opinion of BH's technical consultants, the proposed land needed is excessive, and far more that the quantum required for the construction of the Proposed Scheme.

The permanent land take will severely reduce the area to the front of the existing building and thus render it unsuitable for parking and in turn result in the loss of c. 7 parking spaces. While the temporary land needed will remove any vehicular or pedestrian access to the building for the duration of the construction of BusConnects.

Figures 3 and 4 presented below are extracts from an assessment prepared by BH's technical consultants DBFL consulting engineers which identifies the extent of temporary and permanent land that in their view would actually be required to deliver the Proposed Scheme at this location.

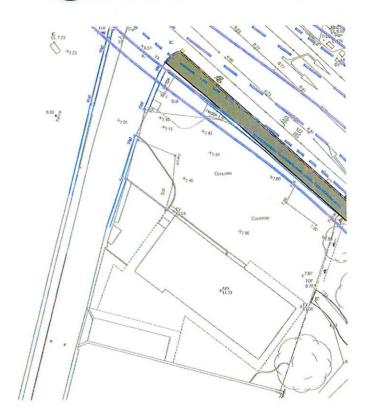


Figure 3 Assessment by DBFL of actual required land for permanent acquisition for Glenalla

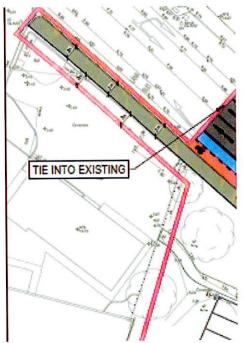


Figure 4 Indication of how BusConnects will appear outside Glenalla as illustrated by DBFL 170027-DBFL-RD-SP-DR-C-1011 rev P01

The assessment prepared by DBFL illustrates the extent of the Glenalla site which, in their view, based on footpath widths of 1.8m and cycle track widths of 1.75m, would be required by BusConnects for both the planning application and permanent acquisition in order to deliver the proposed Scheme. DBFL assess that a potential additional two (2) metres would be required at this location on a



temporary basis in order to construct the Proposed Scheme. This would enable the continued use and operation of these buildings by BH, thereby minimising the potential disruption to the operation of Blackrock Clinic.

3.1.2 Impact on Blackrock Clinic

As part of the Proposed Scheme, it is also proposed to acquire Plot Reference 1019(1).1i (permanent acquisition) and Plot references 1019(2).2i and 1019(3)3.2i (temporary acquisition). These plots are part of the main Blackrock Clinic frontage to Rock Road. Figure 5 presented below is an extract from the CPO map served in respect of these lands.

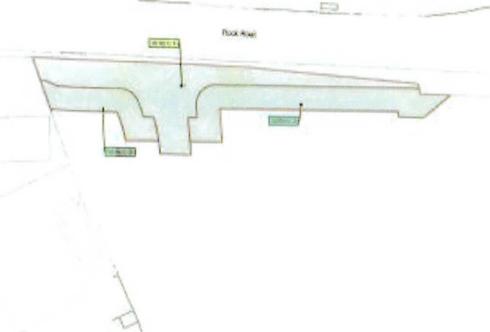


Figure 5 Proposed CPO at existing entrance to Blackrock Clinic



Figure 6 Aerial view of the land impacted



The proposed acquisition of these lands includes a permanent land take which extends for a distance of approximately 20 metres along the existing main access road to the Clinic. This proposed acquisition is considered excessive and unnecessary. BH understands that the reason for this extent of permanent acquisition is to facilitate the location of induction loops on the Clinic junction arm and has nothing to do with delivery of BusConnects and the current planning application. However, the existing Clinic junction arm incorporates induction loops located on BH lands and BH facilitates any necessary maintenance by the roads authority. There is no reason why this arrangement cannot continue and BH further understands that the NTA would accept such an arrangement.

BH's technical consultants estimate that the temporary land take will result in the loss in excess of 40 no. parking spaces. In the opinion of BH's technical consultants, the proposed land take is excessive, and the proposed quantum is not required for the construction of the Proposed Scheme.

BH's technical consultants also estimate that the permanent land take will result in the loss of circa 10 no. parking spaces and will require significant reconfiguration of the affected parking area.

Figures 7 and 8 presented below are extracts from drawings prepared by DBFL Consulting Engineers on behalf of BH which assess the actual land take needed to deliver BusConnects along the Rock Road. These drawings are enclosed with this submission. The drawings illustrates the extent of temporary and permanent acquisition that in their view would actually be required to deliver the Proposed Scheme along the Rock Road frontage.

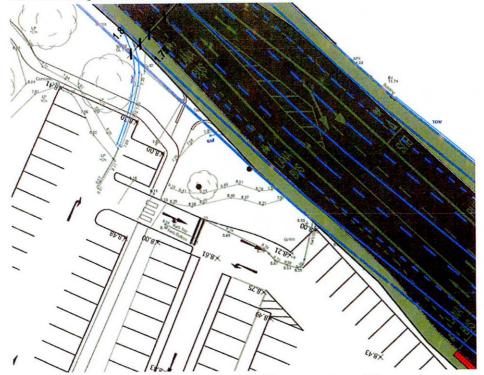


Figure 7 Assessment by DBFL of actual required land for permanent acquisition

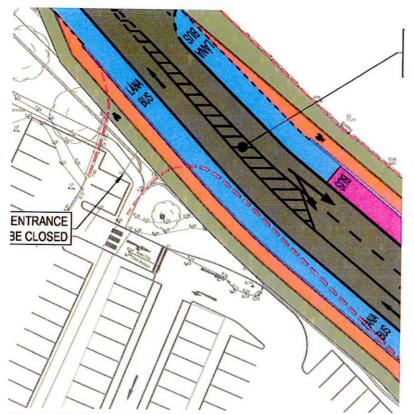


Figure 8 DBFL drawing showing how the BusConnects can be accommodated without the significant land grab 170027-DBFL-RD-SP-DR-C-1011 rev P01

Thus, BH would request that An Bord Pleanála omit by way of condition the excess land from the CPO and the planning application and that the boundaries are revised in line with the proposals by BH.

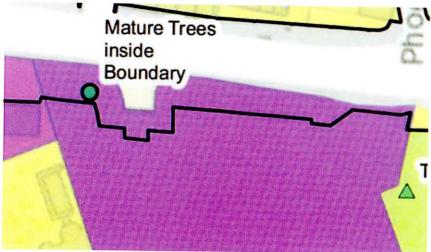


Figure 9 Extract the application showing extent



3.2 DAY TO DAY OPERATIONS OF BLACKROCK CLINIC

3.2.1 Impact on Glenalla

Glenalla is in BH ownership and is one of the Blackrock Clinic support buildings which is vital to the smooth day to day operation of the hospital. The entirety of the Glenalla car park area, the existing vehicular access from Castledawson Avenue and the pedestrian access from Blackrock Clinic are all proposed to be acquired as part of the temporary CPO. The reasons behind the extent of this land acquisition are unclear. The provision of car parking facilities on the Campus as a whole is of vital importance to the day to day operation of Blackrock Clinic. The temporary acquisition of lands at Glenalla would result in the loss of 7 car parking spaces (refer to Figure 10 below). Furthermore, the extent of the temporary acquisition would result in the current access arrangement to Glenalla being eliminated making the building unusable for the duration of the construction of the Proposed Scheme which in turn would severely impact the day-to-day operations of Blackrock Clinic. This would necessitate the relocation of the entire administrative hospital department offsite.

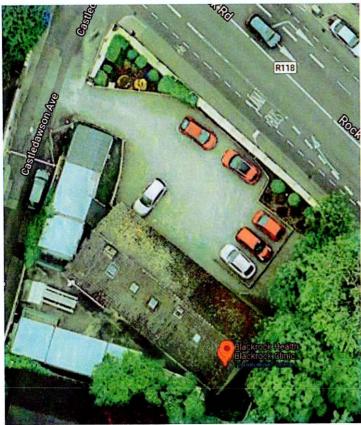


Figure 6 Existing land use and access to Glenalla

3.2.2 Impact on Blackrock Clinic

The proposed temporary and permanent land acquisitions and alignment of BusConnects as shown in the planning application will reduce the parking spaces by c. 40 temporarily and c. 10 permanently.

During the construction of the Proposed Scheme the operation of the existing main access to the Blackrock Clinic campus will be severely impacted. Accommodation works, such as an alternative access point, which would likely be required as part of the Proposed scheme is unlikely to be able to



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adequately cater for the operational requirements of Blackrock Clinic. It is likely that during construction of the Proposed Scheme that Blackrock Clinic would experience significant disruption to its operation impacting on the accessibility of the facility for patients, visitors, service and emergency vehicles. In the short-term it would be envisaged that the medical campus would experience queueing and major capacity issues on the Blackrock Clinic access arm if it were to operate at a lower level of service (vehicle lanes, green time within signals) than the existing access arrangement. Any capacity issues at the Blackrock Clinic arm will produce a knock-on effect on traffic flow at the R118 Rock Road resulting in further congestion on the corridor as vehicle flow in and out of the clinic via the Emmet Square / R118 Rock Road junction is impacted.

Additionally, the only pedestrian access which is not currently indicated on the NTA drawings for BusConnects from the R118 Rock Road into the Blackrock Clinic would be impacted by the temporary works resulting in an unsafe environment for vulnerable road users.

3.3 RELOCATION OF MAIN ENTRANCE AND FUTURE EXPANSION OF BLACKROCK CLINIC

BH have proposed the relocation of the main access to Blackrock Clinic from Rock Road to the south of their site (refer to Figure 11 presented below). In this regard there is currently an appeal with An Bord Pleanála (Case reference PL06D.312908). The proposal on appeal proposes an access with two vehicle exit lanes and one vehicle entry lane. This proposal seeks to integrate the relocated entrance into the Proposed Scheme.

A further planning application has also been made to Dún Laoghaire—Rathdown County Council for an alternative access arrangement at the same location with a single vehicle entry lane and a single vehicle exit lane. This is currently being assessed by the County Council.

Either of the proposed relocation options provides additional space at the proposed junction location which will benefit cyclists and pedestrians as well as vehicles, with potential dedicated cyclist and pedestrian stages at the traffic signals thereby providing a higher level of service for such vulnerable road users. This access relocation also has long term benefits for Blackrock Clinic as it provides a more generous junction arrangement, thereby futureproofing the junction for predicted traffic growth on the Rock Road R118 and facilitating potential future expansion of the Blackrock Clinic campus.

The issue of the relocation of the main entrance to Blackrock Clinic from Rock Road was previously raised when BH representatives met with the NTA between November 2020 and July 2022. At these meetings the intention of BH to relocate the main entrance to the south of the existing entrance was highlighted. Also, at this meeting alternative entrance proposals were discussed, and as noted above these have been subsequently submitted to the planning authority for planning permission.

Thus, BH would respectfully request that any forthcoming approval for the Proposed Scheme provides for the new access to Blackrock Clinic in line with the proposed access which is currently the subject



of an appeal with An Bord Pleanála as shown on the drawing no. 170027-DBFL-RD-SP-DR-C-1011 rev P01 or the similar layout as the subject of an application 170027-DBFL-RD-SP-DR-C-1011 rev P02.

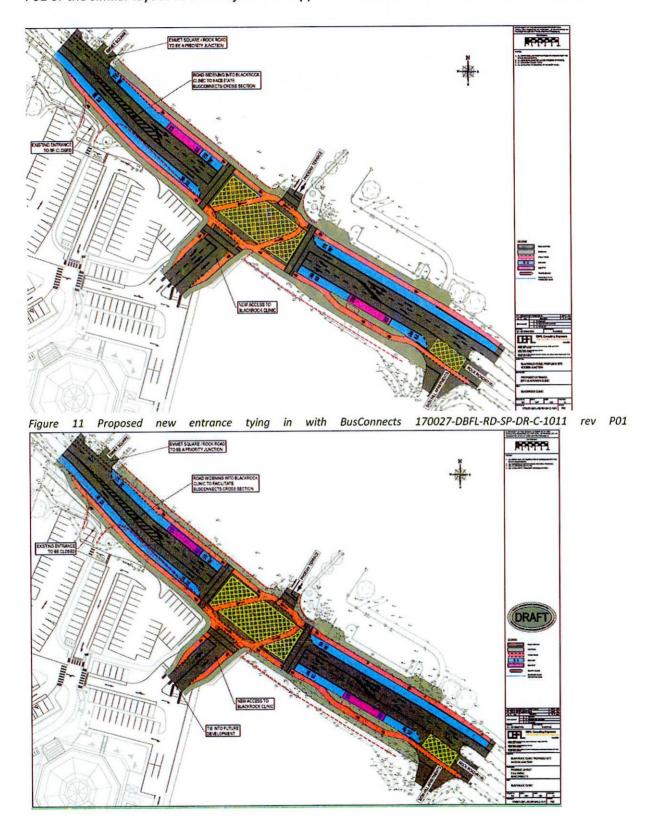


Figure 7 Current single lane access currently with DLR County Council with revised siting of the access point170027-DBFL-RD-SP-DR-C-1011 rev P02



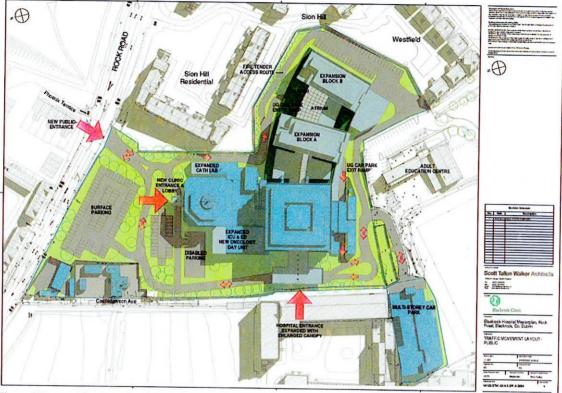


Figure 8 Proposed masterplan for Blackrock Clinic

4 OBSERVATIONS ON THE PROPOSED SCHEME

4.1 Incorrect Dun Laoghaire Rathdown Development Plan

It is noted that the Proposed Scheme application does not reflect the current \underline{D} \underline{u} \underline{n} Laoghaire-Rathdown County Council Development Plan 2022 – 2028 which was adopted on March 10^{th} 2022 and came into effect on April 21^{st} 2022. The application documentation refers to the Dun Laoghaire Rathdown Development Plan 2016- 2022 which is no longer current. As a result, the zoning for the BH Lands is incorrect in the application documentation. It appears to be a fundamental flaw in the proposal. As can be seen in Figure 15 presented below it does not reflect the fact that Seafort is also now zoned for medical use and is within the ownership of Blackrock Health.

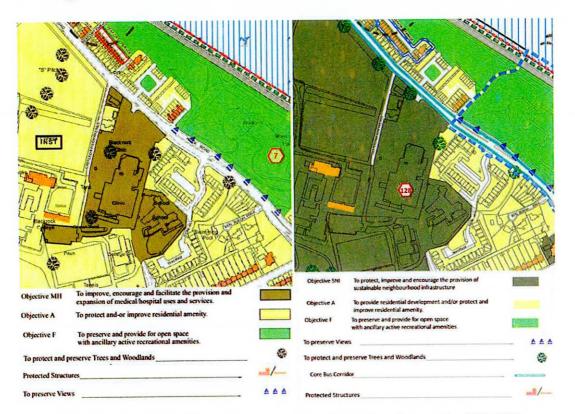


Figure 9 DLRCC Development Plan 2016 - 2022

Figure 15 DLRCC Development Plan 2022- 2028

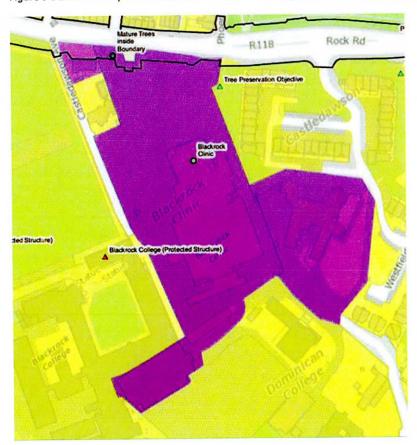


Figure 16: Extract from the Proposed Scheme application documentation (Dun Laoghaire Rathdown Development Plan 2016-2022)



4.2 Southside of Rock Road

It is also noted that all of the CPO proposals are on the southside of the existing Rock Road, rather than an even distribution across both sides of the road. This has an unfair and undue impact on all properties on the south side of Rock Road, including the Blackrock Clinic. If the footpaths and cycle paths along Rock Road met the minimum dimensions set by DMURS, rather than exceeding the DMURS guidelines as currently proposed, and road alterations were more evenly distributed on both sides of the road, both the CPO cost for the NTA and the impact of the proposal on the land take from BH would be minimised. This reduction is demonstrated on DBFL drawing no. 170027-DBFL-RD-SP-DR-1001. This reduced land take would enable the retention of more trees and car parking within Blackrock Clinic grounds and would minimise operational impacts during the construction phase and operational phase of the Proposed Scheme. It is critical that this issue is re-examined and that the realignment is required by way of condition in line with the DBFL drawing no. 170027-DBFL-RD-SP-DR-1001.

4.3 Visual impact

The proposed BusConnects planning application and associated areas for the CPO along the Rock Road will result in the removal of several mature trees within the Blackrock Clinic site, as well as established boundaries, entrances and planting. The magnitude of change, as set out in the LVIA in chapter 17 of the EIAR is very significant. The magnitude of change is considered to be negative, and very significant in the short term and changing to moderate in the long term. The scale of this impact could be prevented if the land take from Blackrock Health is minimised.

4.4 Impact on utilities

The construction of the Proposed Scheme has the potential to create significant and unacceptable disruption to the operation of Blackrock Clinic unless its implementation is planned where a temporary/permanent alternative entrance for Blackrock Clinic is considered. BH are of the view that the work stages need to be planned so that the alternative entrance for Blackrock Clinic is first provided and made operational without effecting the existing entrance. Once the new entrance is fully complete and operational, then and only then can BusConnects Project works commence at the current entrance. This will also require the reconfiguration of Blackrock Clinic access/egress barrier systems together with roadway reconfiguration, pedestrian access routes and signage etc.

It is also worth noting that any construction / other disruption to the existing/new entrance to Blackrock Clinic from Rock Road is likely to cause unacceptable disruption to the operation of Blackrock Clinic. Therefore, BH believe that conditions should be imposed on any approval that the work should be staged to avoid access issues by means of detailed staged planning with the Blackrock Clinic management.

Other potential significant issues which have the ability to severely impact the operations of Blackrock Clinic will need careful attention and agreement with the management of Blackrock Clinic. There are a number of significant items which need due care and attention and need to be agreed in advance



with Blackrock Clinic regarding how they will be managed both during the implementation of the Proposed Scheme and in the long term following the completion of the scheme.

- Medium pressure gas main which enters the Blackrock Clinic site adjacent the existing main entrance. The possible relocation of a medium pressure gas main is challenging and risks isolating Blackrock Clinic from the gas grid. Blackrock Clinic is obviously dependant on natural gas to function and any interruption or associated risk must be discussed with Blackrock Clinic before any work that puts the gas supply at risk.
- Existing traffic light control at Blackrock Clinic entrance must operate normally at all times to maintain a safe and operational facility.
- Communications cables, which enter Blackrock Clinic site at two locations at the existing main entrance and adjacent to Sion Hill apartments needs to be kept in full working order to enable Blackrock Clinic to operate.
- Water supply is critical to the functioning of Blackrock Clinic and any potential contamination of the water supply (as previously experienced during road works on the Rock Road) would have serious impact on the health of the patients, clients and staff of Blackrock Clinic. Thus, any potential shutdowns of the water supply must be agreed with Blackrock Clinic with adequate warning and assurances that there will be no contamination of the water. Also, a contingency must be agreed with Blackrock Clinic, including provision for treating water / removing contamination before delivery to Blackrock Clinic. It is worth noting that Blackrock Clinic had a recent experience with contamination to the water supply as a result of water main works within the Blackrock Area and that Blackrock Clinic only became aware of the issue when the contamination presented at the tap.
- The main electrical MV supply to the hospital is within the works area of the Proposed Scheme BusConnects Project and any potential damage or disruption to the power supply represents a significant risk to Blackrock Clinic's operations. In this regard, BH request that that any Works that would involve potential disruption to the power supply (e.g. cable diversions) must be discussed with the Blackrock Clinic in advance and that a contingency plan is agreed before such Works commences.

5 CONCLUSION

BH supports the principle of the Proposed Scheme, however they have genuine concerns regarding the quantum of lands to be acquired from them for its delivery. The land acquisition proposals appear to be excessive and unsubstantiated. BH request that the development is altered in line with the proposed drawings by DBFL drawing no. 170027-DBFL-RD-SP-DR-C-1001 and that the actual extent of permanent and temporary land areas to be used as part of the BusConnects proposal and acquired is reduced accordingly.

BH also request that the Proposed Scheme be modified to reflect the proposal to relocate the main entrance into Blackrock Clinic as indicated on drawing nos. 170027-DBFL-RD-SP-DR-C-1011 rev P01, and 170027-DBFL-RD-SP-DR-C-1011 rev P02. BH have clearly demonstrated how their proposal to relocate the main entrance can be integrated into the Proposed Scheme which in the opinion of BH

provides a better solution for both Blackrock Clinic and the long-term future development of the Rock Road.

BH request that the Proposed Scheme be redesigned to enable the continued operation of Glenalla as an important part of the Blackrock Clinic and that the area of land acquired for the construction phase is reduced to that required for the operational phase. We also request that the land acquisition proposals for the operational phase are reduced, as shown on the submitted DBFL Drawing.

Finally, BH request that all utilities are considered and that a condition is placed on any forthcoming approval to require agreement of their repositioning and notification and agreement of any disruption of these utilities is provided to Blackrock Health.

Please do not hesitate to contact us should you have any further queries about this observation.

Yours faithfully,

Trevor Sadler

Enclosed:

- Drawings by DBFL
- Observation fee

