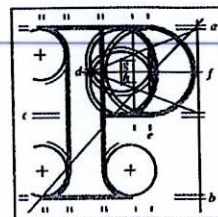


Our Case Number: ABP-313509-22

Your Reference: Tesco Ireland Limited



**An
Bord
Pleanála**

Avison Young
2-4 Merrion Row
Dublin 2
D02 WP23

Date: 25 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 in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. As your client is a listed landowner on the Compulsory Purchase Order schedule, no fee is required. A refund for the fee lodged 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: 01-8737287

HA02A

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bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Your Ref: ABP Ref. No. 313509-22

12th July 2022

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

Dear Sir/Madam,

RE: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme County Dublin

An Bord Pleanála Ref. No. 313509-22

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 Belfield/Blackrock 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.

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 Belfield/Blackrock to City Centre route, Tesco currently has 2 no. stores along this route, at the Merrion Shopping Centre and Baggot Street Upper.

Compulsory Purchase Order

The Merrion Shopping Centre has been served with a temporary Compulsory Purchase Order (hereafter 'CPO') for Plot List: 1004(1).lc, 1004(2).lc, 1004(3).lc, 1004(4).2c, 1004(5).2c, 1004(6).2c, 1004(7).2c.

Our Client would like to seek clarification on the timing and duration of the temporary acquisition of the lands. Additionally, our Client is also seeking clarification regarding the CPO of plot 1004(4).2c.

Figure 1 below, indicates an access ramp and footpath located along Merrion Road used by customers to enter the Merrion Shopping Centre. From a review of the associated documentation, it is unclear whether both the access ramp and footpath are subject to the temporary CPO. Our Client would like to seek clarification as to whether there will be any disruption to the current access arrangements during the works associated with the BusConnects route.



Figure 1: Access ramp and footpath used by customers to access the Merrion Shopping Centre (Source: Google Streetview)

If the Merrion Road entrance is impacted during the works, any person looking to use it would have to travel to the adjacent Nutley Lane entrance, which would be very disruptive, particularly for mobility impaired customers.

Under Section 16.2.1.3 Inclusive Design of the Dublin City Development 2016-2022, it is a requirement that all proposals consider the needs of the widest possible range of different user groups from project outset and in particular to consider the needs of vulnerable groups such as the elderly and disabled.

Our Client's preference is for zone of clearance around the access ramp and steps to maintain safe access to the Shopping Centre. However, if the footpath and ramp are to be undertaken by the NTA, our Client wishes to ensure that necessary steps be taken to protect customers of the Shopping Centre such as the provision of a safe access route to the entrance, appropriate signage and advance warning of works/disruption.

Loading Bays & Cyclist Safety

Tesco has 1 no. store located along Baggot Street Upper which will result in a loss of a loading bay. A wide range of commercial premises operate on Baggot Street Upper, the majority of which require loading bay space for deliveries on a regular basis. It was previously requested that the NTA ensure sufficient safe loading bay facilities are provided to the front of the parade of shops at 2-52 Baggot Street Upper. We note from the documentation submitted that an additional loading bay has been provided at Eastmoreland Place, however, this loading bay is too far away for it to be used by Tesco and the other commercial premises operating along Baggot Street Upper.

As a result, an under provision of such facilities at this location could result in a scenario whereby delivery vehicles are forced to park in other loading bays a considerable distance away, resulting in potential health and safety and wider congestion issues.

Tesco, as well as other commercial operators at this location, require loading space twice every day. Any reduction in delivery space could have significant impacts on the operation of these premises, knock on effects to customers and have direct impacts on traffic flow along Baggot Street Upper.

In addition to the above, from a review of the planning documentation, our Client has concerns regarding cyclist and staff safety. As indication on Figure 2, the cycle lane is to be located on the inside of the loading bay which can be viewed as a safety concern to both the cyclist and the staff off-loading, as deliveries will have to cross the cycle lane. Any outlet not only Tesco, has to off load onto the kerbside which also means any person off-loading is stepping blindly from the back of a vehicle onto a cycle lane. Additionally, if there is a tail lift being used this has the potential to cause serious injury to a cyclist.

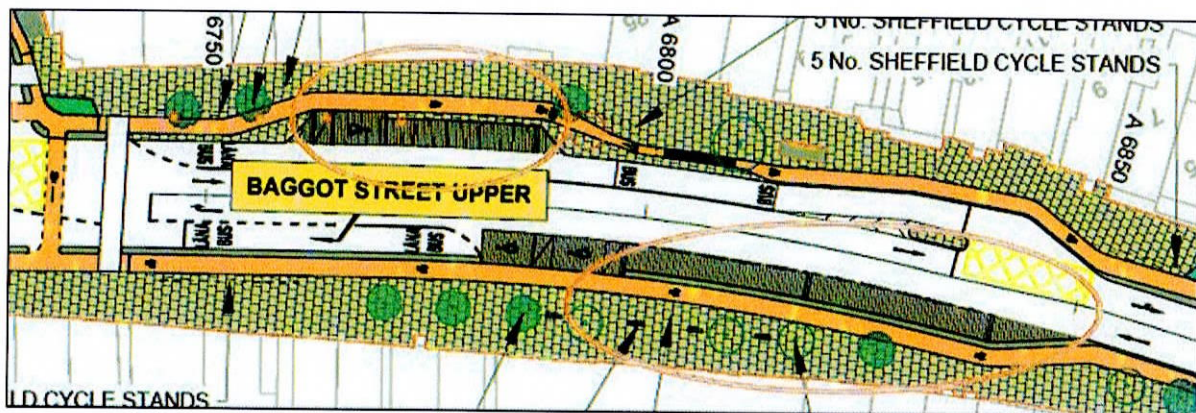


Figure 2: Proposed Cycle Lane located on the inside of loading bays along Baggot Street Upper

Furthermore, it is unclear from the documentation provided if there will be any segregation of the cycle route in terms of a kerb and if so, will this be dropped to facilitate deliveries. Our Client, requests clarification on same, as such are important for the operation of the store and to ensure staff safety.

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 would ask that the importance of daily servicing, accessibility and cyclist safety be recognised at the Baggot Street Store be considered. Additionally, we would like to seek clarity regarding the temporary acquisition of lands at the Merrion Shopping Centre and wish to ask that the importance of pedestrian access and 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

Muirenn Duffy
Associate Director

+353 (0)1 5719911

muirenn.duffy@avisonyoung.com

For and on behalf of Avison Young Planning and Regeneration Limited