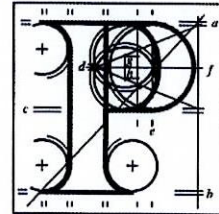


Our Case Number: ABP-314056-22



**An
Bord
Pleanála**

Tesco Ireland Ltd
c/o Avison Young
2-4 Merrion Row
Dublin
Dublin 2
D02 YN56

Date: 26 September 2022

Re: Liffey Valley to City Centre Core Bus Corridor Scheme.
Fonthill Road to High Street all in the County of 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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 Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Your Ref: ABP Ref. No. 314056

13th September 2022

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

Dear Sir/Madam,

RE: BusConnects Liffey Valley to City Centre Core Bus Corridor Scheme County Dublin

An Bord Pleanála Ref. No. 314056

We, Avison Young, in conjunction with Pinnacle Consulting Engineers, 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 Liffey Valley 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 further opportunity to engage with the NTA and now 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 acknowledged that the proposed BusConnects Scheme will greatly improve the way in which Dublin City functions from an economic, social and environmental perspective. However, the following submission outlines our Clients concerns arising from the proposed route which will have a direct impact on the operation of some stores – the loading bay space at the city centre Thomas Street Express store where no alternative delivery options exist and potential issues associated with the alternative access route to the Ballyfermot Road store.

Tesco currently has 3 no. stores along the Liffey Valley to City Centre route, at the Liffey Valley Shopping, Ballyfermot Road and Thomas Street.

Liffey Valley Shopping Centre

The proposed amendments to the internal road network of Liffey Valley Shopping Centre, and specifically the proposal to upgrade the existing roundabout to a signalised junction are welcomed in that vehicular access will be maintained to the Tesco supermarket and service yard, local traffic flows will be improved, and enhanced pedestrian and cycling infrastructure will be provided.

Ballyfermot Road

During the Emerging Preferred Routes stage, we previously outlined our concerns to the NTA regarding the proposals which will have a direct impact on the Ballyfermot Road and in turn access to the Tesco store.

It is proposed to make the Ballyfermot Road one-way, meaning access to the Tesco store will only be available from the east and egress will be to the west. These changes will have an impact both on customer, service and delivery vehicles and the local community.

In addition to customers having to take a more circuitous route to the store, the proposed one-way system will result in HGV's using Le Fanu Road, which is a primarily residential street, for means of accessing the Store for deliveries. As previously identified to the NTA, Le Fanu Road is not considered an appropriate route for large HGV delivery vehicles, as given the presence of speed ramps and dual sided on-street parking there is the potential health and safety risks to the local residential community.

The introduction of a proposed one-way system along Ballyfermot Road, will result in both large and rigid delivery vehicles utilising residential streets, rather than maintaining the two-way system on the primary road which can facilitate larger vehicles.

In addition to the above, it was also previously requested that that the NTA provide autotrack analysis details that demonstrate that heavy goods vehicles will be able to safely access the supermarket car park from Ballyfermot Road following the proposed changes.

Thomas Street

Tesco, operate an Express store at 51-52 Thomas Street and the existing loading bay outside of the premises is to be removed under the current proposal. An alternative loading bay is proposed; however, it is approximately 110m from the store to the west. This is a significant cage pull for a colleague and is not a suitable arrangement for convenience retailers who typically receive two deliveries per day. The location of loading bays at a considerable distance from commercial premises reliant on regular deliveries, can lead to pedestrian safety issues whereby delivery vehicles/handlers come into conflict with pedestrians potentially leading to serious health and safety risks.

The removal of this loading bay, in addition to the loading bay outside of nos. 62-63 Thomas Street is a significant concern with direct impacts on our Clients operational efficiency. Where numerous businesses rely on loading bay space, any reduction in the quantum of space can lead to logistical issues with delivery drivers having to loop around the area numerous times before space becomes available or in some instances having to postpone the delivery completely. This not only has negative knock-on effects for customers and trade, but it also disrupts the distribution system and makes it less environmentally friendly. The strict enforcement of loading bay facilities is imperative in this regard to ensure these designated areas are readily available for their intended use when needed.

A wide range of commercial premises operate on Thomas Street, the majority of which require loading bay space for deliveries on a regular basis. The NTA has failed to demonstrate that the limited loading bay provision on Thomas Street is sufficient to meet the needs of adjacent retail and commercial premises. In this regard, it is submitted that the existing loading space to the front of 51-52 Thomas Street should be retained to adequately serve the wider commercial premises.

In addition to the above, from a review of the planning documentation, our Client has concerns regarding cyclist and staff safety. As indicated below, 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 limited to 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 pedestrian or cyclist.

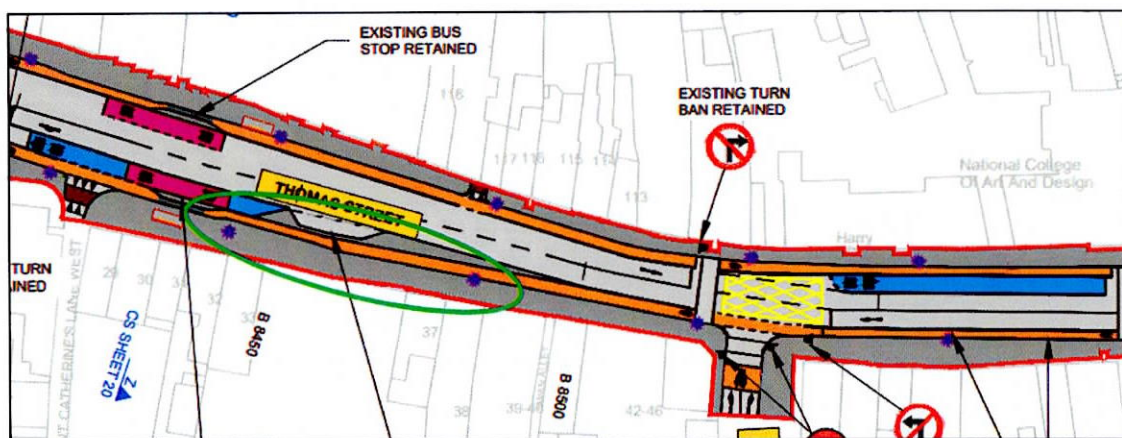


Figure 1: Proposed Cycle Lane located on the inside of loading bays along Thomas Street

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, respectfully requests clarification on same, as such are important for the operation of the store and to ensure staff safety.

Conclusion

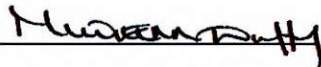
Tesco fully acknowledges and welcomes the need to improve the accessibility of our city in line with our European counterparts. In this regard, the NTA's investment in sustainable transport to improve the urban environment of Dublin City and its suburbs is welcomed, however, we would ask that the importance of daily servicing and accessibility for convenience stores be recognised.

A reduction of loading bay facilities without any mitigation measures would otherwise give rise to wider issues such as missed deliveries, traffic congestion due to restricted access, increased HGV volumes on the roads, which are contrary to the intended purposes of this project. It is therefore requested that the existing loading space to the front of 51-52 Thomas Street be retained.

Our Clients concerns are specific in nature and relate to delivery and customer access. Tesco Ireland is eager to ensure that deliveries and customer access to their stores can continue to be undertaken in a safe and sustainable manner. In particular, our client respectfully requests the operational requirements associated with retail deliveries and convenient customer access 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