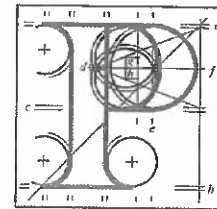


Our Case Number: ABP-314610-22

Your Reference: Tesco Ireland Limited



**An
Bord
Pleanála**

RMLA Limited
Unit 3B
Santry Avenue Industrial Estate
Santry Avenue
Santry
Dublin 9
D09 PH04

Date: 23 November 2022

Re: BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme
Ballymun/Finglas to Dublin City Centre

Dear Sir / Madam,

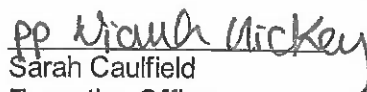
An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please be advised, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a refund of €50 will be made to the credit/debit card used to make the online observation.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, please contact the undersigned. 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

HA02 (Acknowledgement - No Receipt to Issue)

Tel	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 Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
---	---



Planning Consultants

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

RMLA Limited,
Unit 3B,
Santry Avenue Industrial Estate,
Santry Avenue,
Santry,
Dublin 9,
D09 PH04

Email: admin@rmla.ie
Date: 14th November 2022

Dear Sir/Madam,

Re: BusConnects Ballymun/Finglas to Dublin City Centre Core Bus Corridor Scheme County Dublin

An Bord Pleanála Ref. No. 314610-22

Introduction

We, RMLA Limited, are acting for 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 Ballymun/Finglas 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 all correspondence in relation to this submission should be sent to the Agents, RMLA Limited, Unit 3B, Santry Avenue Industrial Estate, Santry Avenue, Santry, Dublin 9, D09 PH04. We 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 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. In this regard, our client welcomes 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 Ballymun/Finglas to City Centre route, Tesco currently has 2 no. stores along this route, at the Phibsborough Shopping Centre and Clearwater Shopping Centre. Additionally, the Tesco Ballymun Distribution Centre is situated along this route.

Phibsborough Shopping Centre

The Phibsborough Shopping Centre has been served with a Compulsory Purchase Order (hereafter 'CPO') for Plot List: 1021(1).1c and 1021(2).2c. The current proposal will result in a net loss of c. 35 no. car parking spaces at Phibsborough Shopping Centre and potentially disrupt deliveries to the anchor Tesco supermarket which is central to the vitality and viability of this Centre. The need for customers to have sufficient vehicular access is recognised as part of the Retail Planning Guidelines, which state that supermarkets require adjacent car parking as the majority of their customers undertake their bulk convenience shopping trips by car¹.

Furthermore, customer car parking should be retained and provided for in this location, in order to ensure the viability of the commercial and retail premises at this location. Given the fine grain residential characteristics of the area and the established retail and commercial hub, alternative parking in the vicinity cannot be provided and would not be suitable for customer needs. In this regard, the commercial viability of the anchor supermarket could be severely impacted should adequate access or parking provision not be maintained. It is therefore requested that the NTA amend the current proposal for this location to ensure the Shopping Centre remains served by sufficient car parking.

Additionally, our client is seeking clarification regarding the CPO of Plot 1021(2).2c indicated below in Figure 1 in which private rights are to be 'temporarily restricted or otherwise interfered'. Our client would like to seek clarification on the timing and duration of the temporary acquisition of the lands.

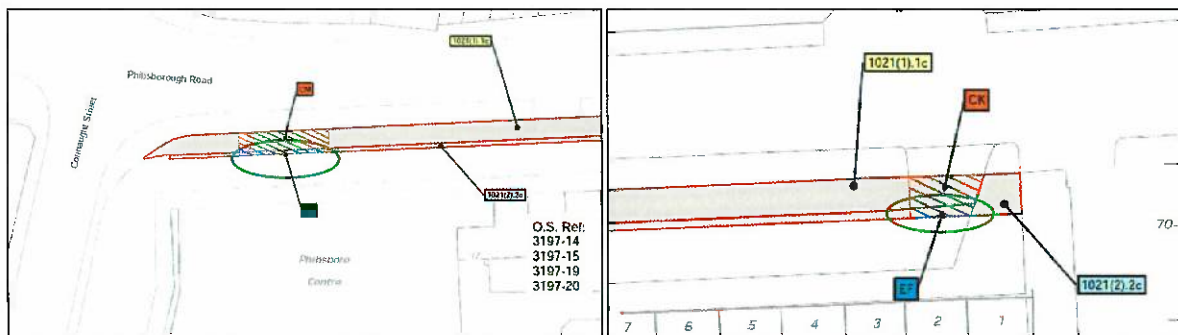


Figure 1: Entrance points at the front of the Shopping Centre to be temporarily restricted indicated by green circle

The above entrance points to the front of the Shopping Centre are used for delivery access by the anchor unit, it is therefore requested that the NTA, should permission be granted, ensure that appropriate safe vehicular access points are maintained to the front of Phibsborough Shopping Centre. A failure to provide appropriate access points to the car park could result in conflicts between delivery vehicles and other road users.

The requirement to facilitate deliveries at the access point to the front of the Shopping Centre, furthest north, can be achieved through the design process by the inclusion of removal bollards, a clear path and a dropped kerb at the road. Additionally, deliveries can be facilitated at the southern entrance by softening the kerb. It should be noted, planning permission under ABP Ref. No. 308875 accommodates this movement.

¹ Guidelines for Planning Authorities – Retail Planning, pg. 35

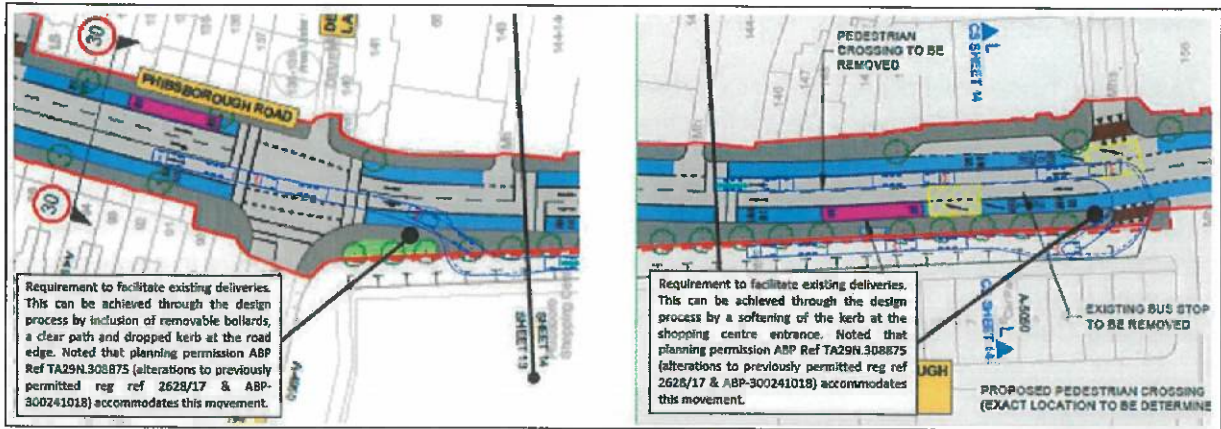


Figure 2: Autotrack and commentary for the Phibsborough Shopping Centre front entrances

Furthermore, as indicated in Figure 3, the proposed amendments to the North Circular Road and Phibsborough Road junction will result in a tight junction for HGV movement in which both lanes would be required to perform the manoeuvre. As an important route in the city, the North Circular Road would not just be used by Tesco, with this main artery into the city likely to be an important route for numerous commercial businesses. In this context, we would ask that consideration is given on how left turning manoeuvres can be achieved for all service vehicles.

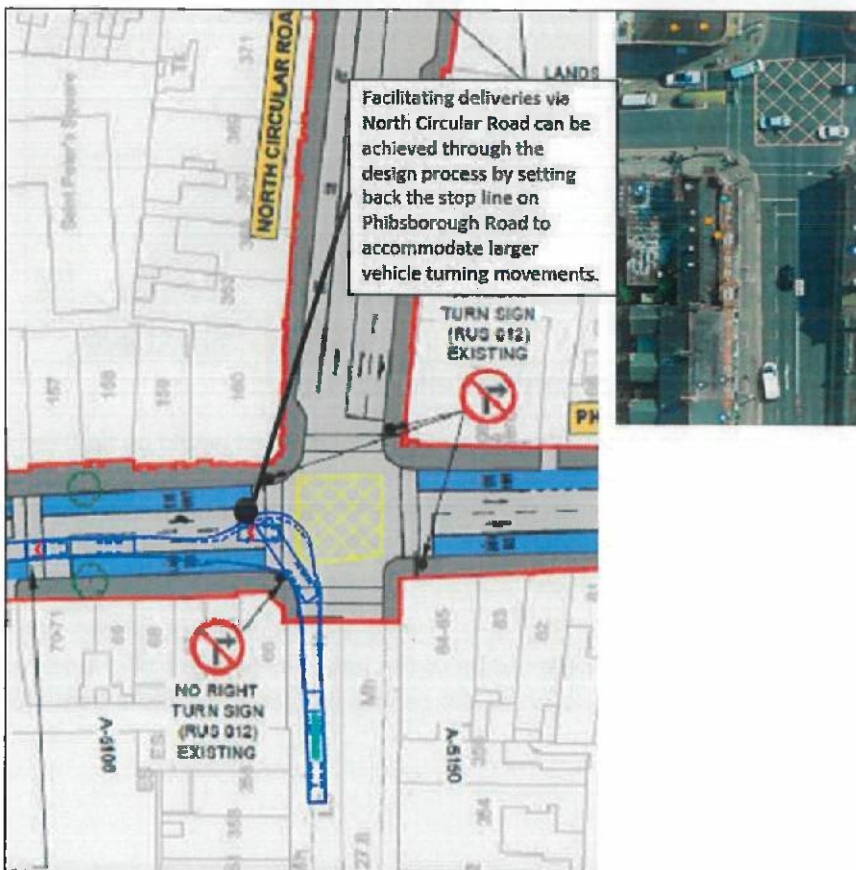


Figure 3: Autotrack and commentary for North Circular Road and Phibsborough Road junction

Clearwater Shopping Centre

Tesco has 1 no. store located at the Clearwater Shopping Centre and welcomes the inclusion of the left turn lane into the Shopping Centre from the Finglas Road which will reduce queuing lengths.

However, our client has concerns regarding the removal of the left turn slip lane onto the Finglas Road from the Shopping Centre. HGV's use this junction 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. As such, please see Figure 4, in which an Autotrack drawing of HGV movements to and from the Shopping Centre are examined.

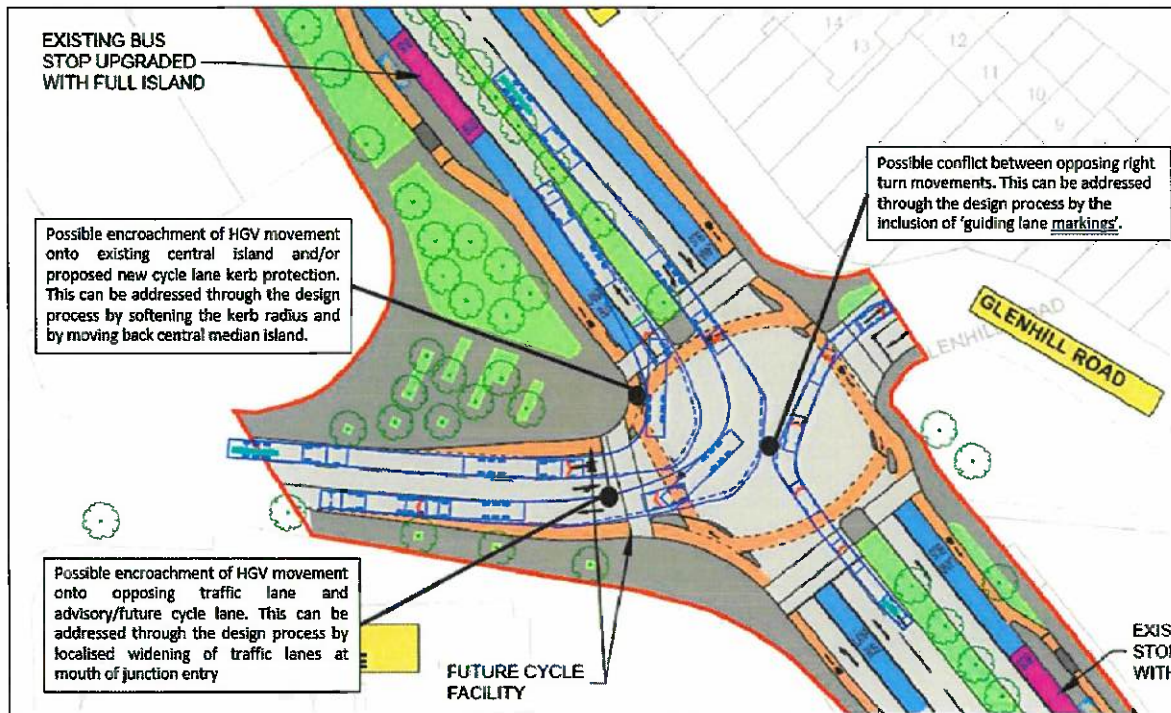


Figure 4: Autotrack and commentary for the Clearwater Shopping Centre entrance

From a high-level assessment, it appears the exit movement to the Finglas Road would be tight for an HGV due to the combination of a tightened kerb radius and the central island. As indicated in Figure 4 above, the junction as proposed, may result in an encroachment of HGV movement onto the opposing traffic lanes. As such, the junction could result in a health and safety risk for both road users, cyclists, and pedestrians.

Therefore, to reduce the health and safety risk and ensure a safe environment for all, we would respectfully request that the Applicant 'soften' the kerb radius of the junction, ensure traffic lanes are widened at the junction, and the NTA make a reduction in the central median to facilitate safe HGV movements.

Ballymun Distribution Centre

Tesco currently operates a central distribution system for deliveries, which involves the consolidation of individual supplier products at a central warehouse where the products are organised and redistributed as part of a complete delivery, one of the central warehouses is situated in Ballymun. Tesco supports transport improvement schemes and encourages sustainable modes of transport, from customer and staff journeys to HGV deliveries, and this central distribution system for deliveries is currently operated by all the main supermarket chains and is an exemplar in terms of transportation management and environmental sustainability.

The Tesco Distribution Centre situated in Ballymun is accessed through the Old Ballymun Road via Northwood Avenue. As indicated in Figure 5, the NTA propose to remove the left in and left out slip lanes at the R108 South to Northwood Avenue Junction which is the only access point to the Ballymun Distribution Centre.

It is requested that the NTA carefully considers the proposed amendments and the impact the current proposal could have on the safe movement of vehicles. There is concern that the current proposal could result in an increase in queuing lengths along this junction and a concern that the proposed alterations could exacerbate traffic congestion in this area.

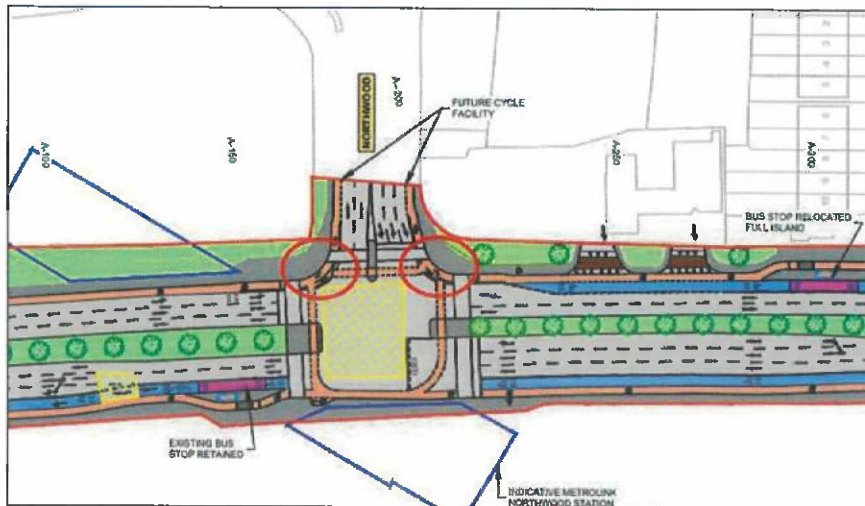


Figure 5: Removal of slip lanes indicated by circles at the R108 South to Northwood Avenue Junction

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 sufficient customer car parking be recognised as part of the Ballymun/Finglas to Dublin City Centre Core Bus Corridor Scheme.

We trust that the points raised in this submission will be considered by An Bord Pleanála as part of the assessment of this application. We are available for discussion on any of the matters referred to above and would also appreciate if you could confirm receipt of this submission by return.

Yours Faithfully,

Robert McLoughlin
Managing Director
For and on Behalf of RMLA Limited

