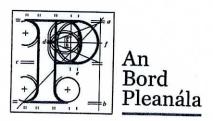
Our Case Number: ABP-316828-23

Your Reference: Calmount Holding Limited



Tom Phillips & Associates 80 Harcourt Street Dublin 2 D02 F449

Date: 20 July 2023

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.

Tallaght/Clondalkin to Dublin City.

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.

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 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,

Niamh Thornton **Executive Officer**

Direct Line: 01-8737247

HA03



SID Online Observation

Online Reference SID-OBS-000951

	Details	
Contact Name Gavin Lawlor	Lodgement Date 04/07/2023 13:42:25	Case Number / Description 316828
Payment Details		
Payment Method Online Payment	Cardholder Name Gavin Lawlor	Payment Amount €50.00
Fee Refund Requisit	ion	
Please Arrange a Refund of Fe	e of Lodge	ment No
€ 50	LD	G-065193-23
Reason for Refund		
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Documents Returned to Obser	A	st Emailed to Senior Executive Officer for Approval
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Payment Reference	C0nboy4Yi E0/AA	(Accounts Section)
Payment Reference ch_3NQ8YnB1CW0EN5F Amount	C0nboy4Yi E0/AA	(Accounts Section)
Payment Reference ch_3NQ8YnB1CW0EN5F Amount	C0nboy4Yi E0/AA Refund Author	(Accounts Section) I Date ised By (2) officer/Director of Corporate Affairs/SAO/Board



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An Bord Pleanála 64 Marlborough Street Dublin 1 D01 V902

4 July 2023

Dear Sir/Madam

Re: Application for Approval for a Road Development and associated CPO for Tallaght/ Clondalkin to City Centre Core Bus Corridor Scheme

Observation on Road Development and Objection to CPO of Plots 1031(1).1a, 1031(2).2a, 1030(1)1c, 1030(2)2c, 1059(1)1aA, 1059(1)1aB, 1029(1).1i, 1029(2.2(i), 1028(1)2iA, 1028(1)2IB, 1031(3).1c and 1031(4)2c

Tom Phillips and Associates have been retained by Calmount Holding Limited of 31-32 Greenmount Office Park, Harolds Cross Bridge, Dublin 6W to make this submission. Our Client, Calmount Holding Limited wishes to make an observation on the Road Development and object to the Compulsory Purchase of their property at the above referenced plots for the development of the Tallaght / Clondalkin to City Centre Core (TC to CC) Bus Corridor Scheme.

Our Client is part owner and operator of the Calmount Business Park. This is a small and thriving business park located along the route of the proposed development between Calmount Road and Greenhills Road.

Our Clients Principal Concerns

Our client generally supports the NTA's vision to upgrade bus services in the Tallaght Clondalkin area and the Ballymount area through the provision of additional road improvements and works.

However, they are concerned that the development as proposed, as it relates to their land holding, has not been properly considered. Their principal concerns are as follows:

- Chapter 3 of the EIS sets out the Reasonable Alternatives considered. It does not however
 fully consider all alternatives in relation to the Greenhills Road. Section 3.3.2.1.4 outlines only
 3 alternatives that were considered in relation to our Clients land. The most obvious
 alternative of widening the Greenhills Road has not been considered.
- The City Edge Project is currently moving through the Plan Making Process and the proposed development does not appear to have properly engaged with this project and may be premature.
- Landuse does not appear to be considered in the EIAR. The EPA Guidelines on the information
 to be contained in Environmental Impact Assessment Reports, expressly requires that landuse
 should be considered under the heading of population and human health. This is a critical
 consideration given the obvious link between landuse and transport.



- The proposed works will have a potential significant impact on both the operation and management of the existing business park and will result in significant disturbance during construction and potentially operation of the new bus corridor route. These impacts have not been properly and fully considered.
- Calmount Business Park still has two remaining development sites. The impact of the proposed development on the potential future development of these sites has not been considered either during construction or operation.

Specially in terms of the CPO, our client is of the view that the development being put forward is premature and does not properly consider all other alternatives, particularly having regard to the published Strategic Framework Summary for the City Edge Project which is a higher order plan which the proposed development must have regard to.

Conclusion

We trust that our Client's concerns will be given due consideration. We request that the Board hold an oral hearing to assist in determining this case and we look forward to elaborating on our Clein's concerns at same.

Yours sincerely

Gavin Lawlor Director

Tom Phillips and Associates