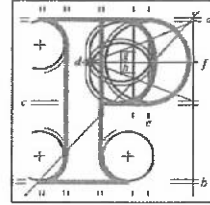


**Our Case Number:** ABP-316828-23  
**Planning Authority Reference Number:**  
**Your Reference:** Killeen Motor Group



**An  
Bord  
Pleanála**

Virtus  
5th Floor  
The Glass House  
11 Coke Lane  
Smithfield  
Dublin 7  
D07 WNP2

**Date:** 25 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 be advised that there is no fee for an owner/lessee/occupier listed on the CPO schedule to make a submission on the case. A refund for the fee paid will issue to you in due course.

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 officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

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

4<sup>th</sup> July 2023

Dear Sir/Madam,

**BUSCONNECTS TALLAGHT/CLONDALKIN TO CITY CENTRE CORE BUS CORRIDOR  
 (ABP REF: HA29N.316828) – SUBMISSION ON BEHALF OF KILLEEN MOTOR GROUP  
 UNLIMITED COMPANY**

Virtus are instructed by Killeen Motor Group Unlimited Company to submit this observation in relation to the above application for the Tallaght/Clondalkin to City Centre Bus Connects Corridor Scheme (ABP Ref: HA29N.316828).

The deadline for submissions is 4<sup>th</sup> July 2023.

Killeen Motor Group owns lands bound to the south by Nangor Road and to the east by Killeen Road, Dublin 12. The proposals pass to the south of the site and changes along the southern boundary of Killeen Motor Group's land (and CPO of some lands) are proposed. The land parcels of relevance are:

- 1142(1).1c (permanently acquired)
- 1142(2).2c (temporarily acquired)
- 1142(3).2c (temporarily acquired)

The Killeen Lands are bound to the south by Nanagor Road, to the east by Killeen Road, to the north by industrial lands and to the west by Diageo Baileys Global Supply. The site is used for the storage of new Toyota and Lexus brand cars and other vehicles before delivery to dealerships throughout the country. An element of preparation for delivery occurs on site. At various times of the year (concurring with vehicle registration times) there are significant amounts of vehicles on site.

Our Client's approximate land holding is shown on Figure 1.

<b>AN BORD PLEANÁLA</b>	
LDG-	064818-23
ABP-	
04 JUL 2023	
Fee: €	50
Type:	c/c
Time:	11:20
By:	NSW

Office +353 1 8665662

[www.virtuspm.ie](http://www.virtuspm.ie)

Directors: Jason Cronin MRICS, MSCS | Neilus Hunt | Robert Keran |  
 Registered Number: 505191 | VAT Registration No: 9808275W

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Figure 1: Approximate Killeen Motor Group Lands

### Proposals Adjacent to the Site

The proposals adjacent to the site comprise:

- The introduction of BusConnects works to Nangor Road.
- The removal and replacement of a wall from the boundary with Diageo Baileys Global Supply to the central entrance. This comprises a “Proposed 2.4m High Rendered Block Wall with Security Measures” as noted on the Fencing and Boundary Treatment Drawing<sup>1</sup> (**Figure 1**).
- The replacement of trees along the boundary with Nangor Road comprising 8 London Plane trees to the west of the central entrance and 6 London Plane trees to the east of the central entrance. Proposed Hedgerow is shown outside the application site, within the Killeen Motor Group site, to the east of the central entrance<sup>2</sup> (**Figure 2**).

<sup>1</sup> (BCIDA-ACM-SPW\_BW-0809\_XX\_00-DR-CR-0049 Sheet No 49 of 56 Status A Rev M01)

<sup>2</sup> (BCIDA-ACM-ENV\_LA-0809\_XX\_00-DR-LL-0049 Sheet No 49 of 56 Status A Rev M01)

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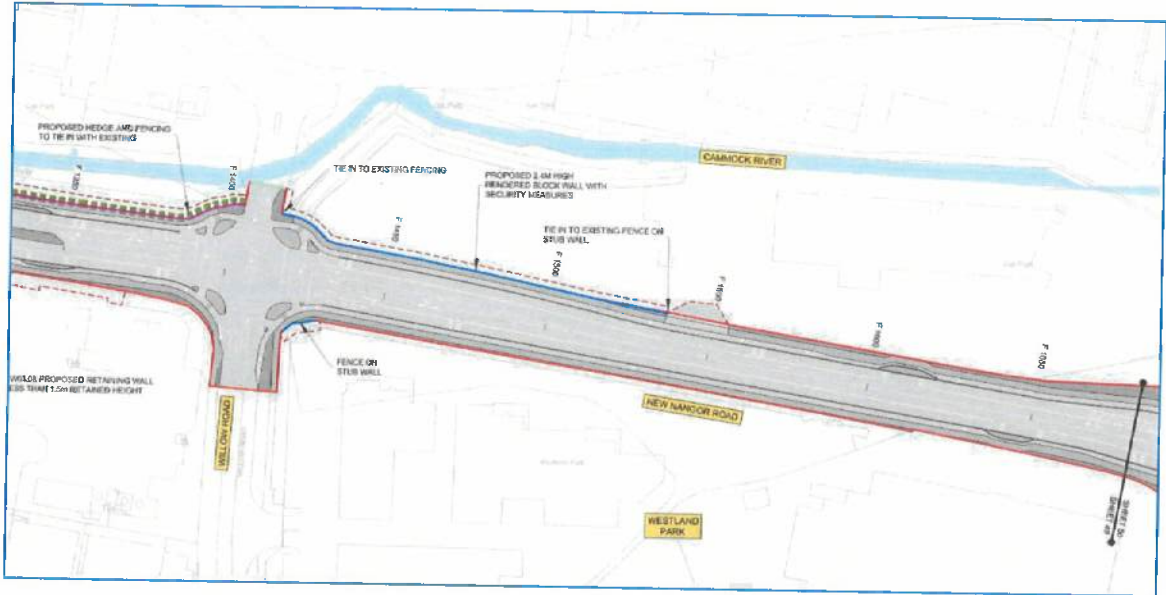


Figure 2: Extract from Fencing and Boundary Drawing

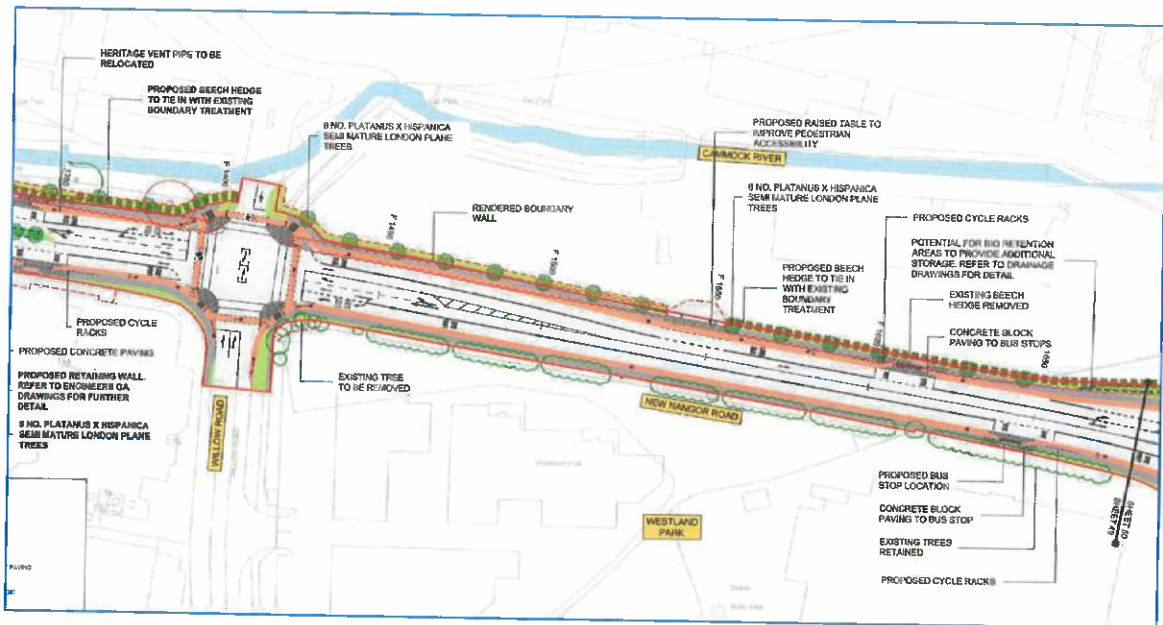


Figure 3: Extract from Landscaping Drawing

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**Submission**

Killeen Motor Group broadly welcomes the proposed BusConnects proposals subject to the following observations.

*Boundary wall and site security*

The provision of a 2.4m high rendered block wall with security measures is welcomed and reflects discussions between the landowners and the application team.

Our Client's site contains significant numbers of high value vehicles and the proposed wall will ensure that security is maintained on site.

However, it is important that the site is not left exposed during construction. It is therefore requested that a condition is added to the grant of permission to ensure that the applicant is required to ensure that the lands are secure at all times. This should be through the provision of on site security, the provision of a robust and secure temporary fence or hoarding during construction amplified by the installation of temporary precast concrete blocks (1 or 2 tonne blocks) to ensure vehicles cannot be driven off site.

*Planting*

The application proposes the removal of existing planting to the west of the central gate and the installation of a wall with planting of 8 London Plane trees behind that wall.

To the east of the central gate, the submitted drawing shows the removal of the existing beech hedge and its replacement with 6 London Plane trees to the south of the existing security fence (which marks the site boundary). It is not proposed to alter this security fence.

The proposed London Plan trees will attract birds and will cause sap, leaves and bird droppings to fall on the new vehicles stored on site. The provision of these trees will sterilise a portion of the site and render it unusable for the site's use as new vehicle storage. It is requested that the trees bounding our Client's lands to the south are omitted from the scheme.

To the east of the central gate the submitted drawings (see **Figure 3** above) indicate a "Proposed Beech Hedge to tie in with Existing Boundary Treatment" to the north of the security fence. This hedge appears to be proposed on our Client's land, outside the application red line, and should also be removed from the proposals as it cannot be delivered.

*Central Gate on Nangor Road*

The CPO includes a temporary CPO for the central gate (1142(3).2c). This gate is operational and access is required at all times.

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It is requested that a condition is added to the permission granted to ensure access for my Client to their lands at all times.

**Conclusion**

The benefits of the BusConnects programme are recognised and improved public transport through the area will have benefits for our Client's staff and encourage more sustainable modes of transport are used to travel to work.

We welcome the inclusion of the new wall to replace the existing wall to the south of our site provided measures are taken to ensure that our Client's site is kept secure at all times. This should include both a robust fence as well as concrete blocks to stop vehicles from being driven off site.

It is requested that the proposed trees are removed from the proposals as they will serve to sterilise a large portion of our Client's lands as it will be unusable for car storage due to sap, bird droppings and leaves coming from the trees.

The application proposes a hedge within our Client's lands to the east of the central gate. This hedge is outside the application red line and should be removed from the proposals.

We respectfully request that our reasonable concerns are addressed in the approved scheme should An Bord Pleanála be minded to grant permission.

Yours faithfully,

---

**Brian Coughlan**

BA, MSc, MIPI, MRTPI  
Virtus

CC: Donal O'Callaghan, CEO, Killeen Motor Group Unlimited Company  
Billy Murphy, Killeen Motor Group Unlimited Company  
Tommy McDermott, Killeen Motor Group Unlimited Company  
John Keane, Toyota  
David McDowell, Reddy Architecture + Urbanism

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