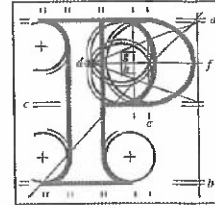


Our Case Number: ABP-316828-23
Planning Authority Reference Number:
Your Reference: Lidl Ireland GmbH



**An
Bord
Pleanála**

BMA Planning
Planning & Development Consultants
Taney Hall
Eglinton Terrace
Dundrum
Dublin 14
D14 C7F7

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 (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 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

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

AN BORD PLEANÁLA
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA
LDG- 064817-23
ABP- _____
04 JUL 2023
Fee: € 50 Type: CHG
Time: 14:57 By: Conner

04/07/2023

SUBMISSION TO PROPOSED TALLAGHT/ CLONDALKIN TO CITY CENTRE CORE BUS CORRIDOR SCHEME

BORD REF. HA29N.316828
APPLICANT: NATIONAL TRANSPORT AUTHORITY
OUR CLIENT: LIDL IRELAND GMBH

Dear Sir/ Madam,

On behalf of **Lidl Ireland GmbH** of Main Road, Tallaght, Dublin 24, we have been instructed to make the following submission to the proposed Tallaght/ Clondalkin to City Centre Core Bus Corridor Scheme – An Pleanala Bord Ref. HA29N.316828.

As detailed below, the Lidl store at Greenhills Road will be severely impacted by the proposed development. The Lidl store currently has good profile and direct access from Greenhills Road for private cars and public transport. If the proposed development is approved, the profile and access will diminish considerably with associated impacts on the store. The information submitted with the application does not indicate that these impacts are adequately assessed or mitigated, as detailed further below.

The statutory fee of €50 is enclosed.

LIDL GREENHILLS ROAD

The existing Lidl supermarket at Greenhills, Dublin 12 (Eircode D12 KW14) is located on the southern side of the Greenhills Road, to the north of Keadeen Avenue and west of the St Columba's Road and St Killian's Avenue residential streets.

Originally granted permission in 2004 (Reg. Ref. SD04A/0784), the Lidl supermarket comprises a gross floor area of c.1,700sq.m with associated car parking spaces provided to the front (west) of the store. The existing supermarket serves a large local catchment including the large residential populations of Walkinstown and Kilnamanagh and the working population within Ballymount industrial and office parks.

Access from the above residential and employment centres to the Lidl supermarket is provided from the Greenhills Road which forms the northern boundary of the site and extends south-west to Kilnamanagh and north east to Ballymount and Walkinstown. In this context, the Greenhills Road forms the key access route for customers to the Lidl supermarket.

SUBMISSION TO PROPOSED BUS CORRIDOR SCHEME

Impact on Lidl Greenhills Road

As part of the proposed scheme the existing junction of Ballymount Road Upper and Greenhills Road will be closed and a new link road will be created from Ballymount Avenue to connect to the Greenhills Road. A new link road will also be constructed from Calmount Avenue to connect to the Greenhills Road and a roundabout provided at this junction. The eastern arm of this 4-arm roundabout will provide access to the existing Lidl supermarket. The existing Greenhills Road will be retained for local access with a cul-de-sac provided at the northern end.

Figure 1 attached illustrates the proposed roads proposals superimposed on an existing map of the area.

Arising from the proposed bus corridor scheme and associated road works, all passing traffic along the Greenhills Road from Kilnamanagh to Walkinstown, will be redirected along Calmount Road and Ballymount Avenue and therefore bypass the existing Lidl supermarket. Our client has the following concerns: -

- The creation of a local access only route at the Greenhills Road will significantly reduce access to the existing Lidl supermarket for customers travelling from Walkinstown.
- Rerouting traffic from the Greenhills Road to Ballymount Avenue and Calmount Road will eliminate the existing high volume of passing traffic along this route and associated visitors to the Lidl supermarket.
- Redirecting the existing high frequency bus routes from the Greenhills Road to the proposed route on Ballymount Avenue and Calmount Road will completely remove public transport access to the Lidl supermarket and therefore disadvantage employees and customers that do not have access to a private car.
- All of the above modifications to the existing road and public transport network will severely reduce trade within the existing Lidl supermarket.

It is evident from the above that the proposed scheme will have a very significant negative impact on the existing Lidl supermarket. This impact is not adequately assessed within the submitted Environmental Impact Assessment and it is not clear if viable alternatives have been fully considered.

As a result, appropriate mitigation measures are not proposed to address the very significant negative impact that will arise.

Proposed Alternatives

Stephen Reid Consulting Traffic and Transportation have reviewed the proposed Core Bus Corridor Scheme and provide alternative proposals for the Greenhills Road area. The alternative proposals are illustrated within Figure 2 attached and comprise the following: -

1. Retain westbound Greenhills Road on existing alignment from opposite DPD Group as a diverging slip (accessible for westbound general traffic and buses which can share a single lane as this is an uncongested section of the route (shown as a yellow line), with local eastbound traffic (shown as a red dotted line) from the 'Lidl' junction to the last of the businesses only before the new fork in the road (Concrete Pumping/Ronan Kelly Motors). This maintains access to the businesses and westbound access from Walkinstown to the businesses and to Lidl. The westbound bus lane (shown as a blue dashed line) would be introduced after the Kilakee Drive junction where the verge is widening and continue towards the overbridge at the M50.
2. The eastbound Bus Connects corridor (shown as a blue dashed line) would be a full bus lane following the existing Greenhills Road from the M50 overbridge, and turn left from Greenhills Road (opposite Lidl) via the Calmount Avenue extension and then turn right onto Calmount Road and then continue east at the extension of that road to rejoin the existing Greenhills Road. It is considered that a traffic signal junction in front of the Lidl store in lieu of the proposed roundabout would be more suitable for active travel modes and address bus priority, with bus stops on Greenhills Road near to the existing stops. This arrangement would be instead of the Ballymount Avenue extension which would not be required.
3. On Calmount Avenue the as-built cross section is already 9m between kerbs) so a northbound 3m bus lane on approach to the junction with Calmount Road could be included instead + 2 x 3m traffic lanes, with bus priority at the traffic signals for buses turning right to Calmount Road.
4. Under this proposal there would only be a requirement for an eastbound bus lane on Calmount Road from the Calmount Avenue junction through the eastern extension to the Greenhills Road - as the as-built cross section of the Calmount Road is already 9m between kerbs, this would suit a 3m eastbound bus lane + 2x3m traffic lanes. The off-road cycle paths and improved footpaths can be accommodated on Calmount Road/Calmount Avenue within the existing footpath and verge areas.

The benefits of the above alternative proposals are that there would be no need to widen Calmount Road or Ballymount Avenue, and no need for the Ballymount Avenue extension to Greenhills Road. Traffic signals could be installed at the Ballymount Road Upper junction with Greenhills Road to address safety issues for exiting traffic from the side road onto the wider 4 lane cross-section and to

cater for access to/from the Tymon park access. The right turn from Greenhills Road to Ballymount Road Upper could be banned as the Calmount Avenue extension will cater for this movement and this will aid the efficient operation of the traffic signals.

The existing developments on Ballymount Avenue and Calmount Road have little direct frontage/access points from the existing commercial uses and tend to face inwards away from these road frontages with security fences to limit access to these roads. Most of the traffic that uses Ballymount Avenue is HGV traffic related to logistics companies, industrial, waste depot and Council Depot uses and this would remove interaction/conflict between large slow moving HGVs turning and the bus routes. It would also be more cost effective as there would be less road widening required and less new road built.

Appropriate Mitigation Measures

In the event that the above alternative proposals cannot be accommodated within the Core Bus Corridor Scheme, the following mitigation measures should, at a minimum be incorporated into the detailed design and constructions phases of the final Core Bus Corridor Scheme: -

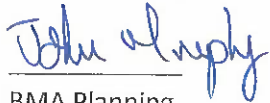
- A. Wayfinding signage to identify the revised access routes to the Lidl store using the Calmount Avenue extension and/or the Ballymount Avenue extension. As identified on Figure 1 (Locations 1 and 2), the "Lidl" signage would be positioned at the junction of Calmount Road with the Calmount Avenue and at the junction of Ballymount Avenue and the Greenhills Road.
- B. Phasing of the works should have minimum disruption/diversion for customers and deliveries, and closure of the eastern section of Greenhills Road (with traffic diverted onto the new Calmount Road extension) should only occur after the Calmount Avenue extension is open to Greenhills Road, and similarly closure of Ballymount Road Upper at Greenhills Road should only occur after the Calmount Avenue extension is open to Greenhills Road. All of the proposals should be undertaken in sequence and a timely manner to ensure minimum disruption to existing businesses.
- C. Temporary traffic management during the works (i.e. the new roundabout on Greenhills Road and road realignments) to have minimal impact on Lidl customer and delivery access.

As a follow up to this submission, our client would welcome the opportunity to discuss the above alternative proposals and mitigations measures with the project design team.

CONCLUSION

We trust our clients' concerns will be taken into consideration by An Bord Pleanála in the assessment of the proposed development. Please keep us informed of the progress in relation to the proposed Core Bus Corridor Scheme.

Yours sincerely,

A handwritten signature in blue ink that reads "John Murphy". The signature is written in a cursive style and is positioned above a horizontal line.

BMA Planning

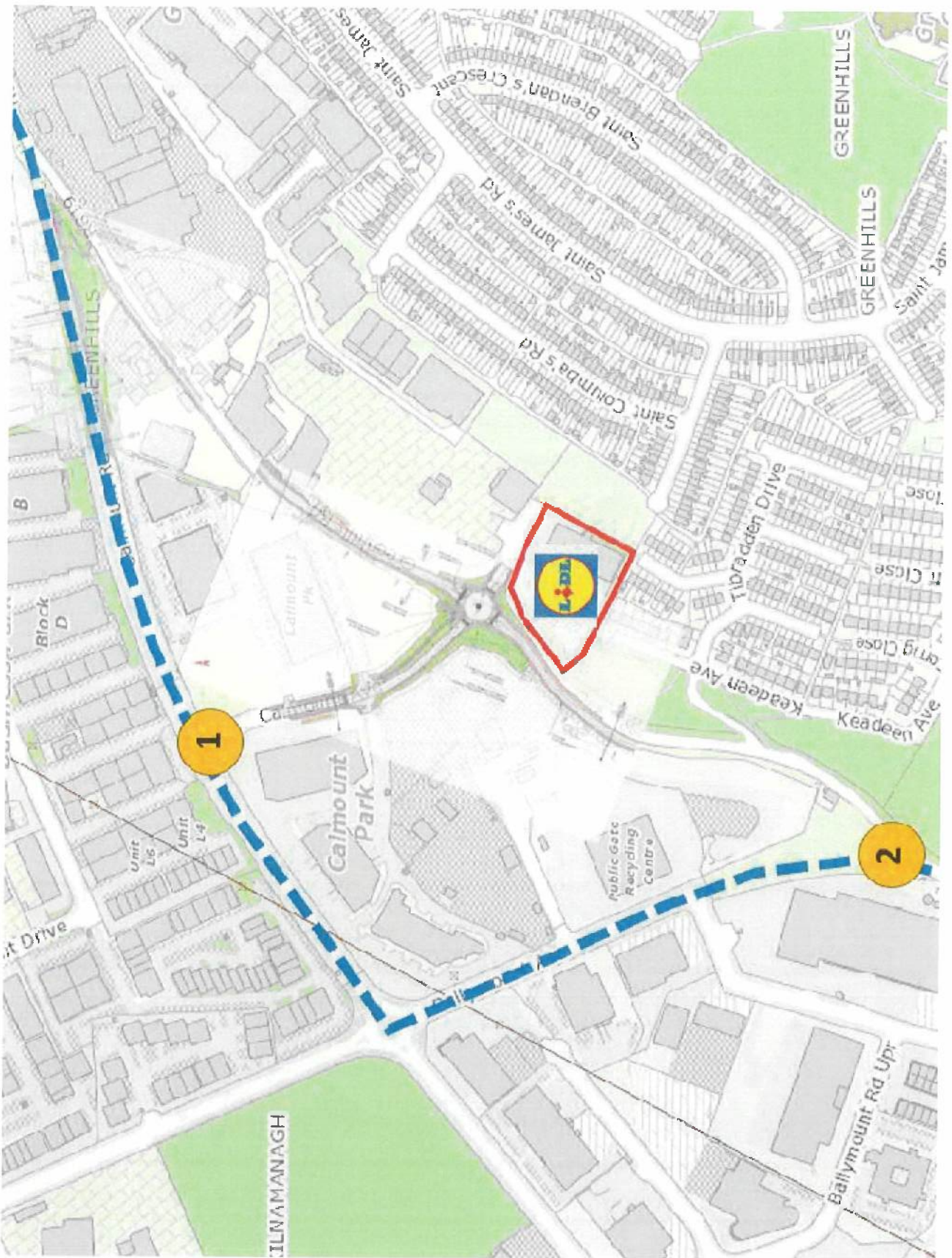


Figure 1: Existing Lidl Supermarket in the Context of the Proposed Bus Corridor Scheme

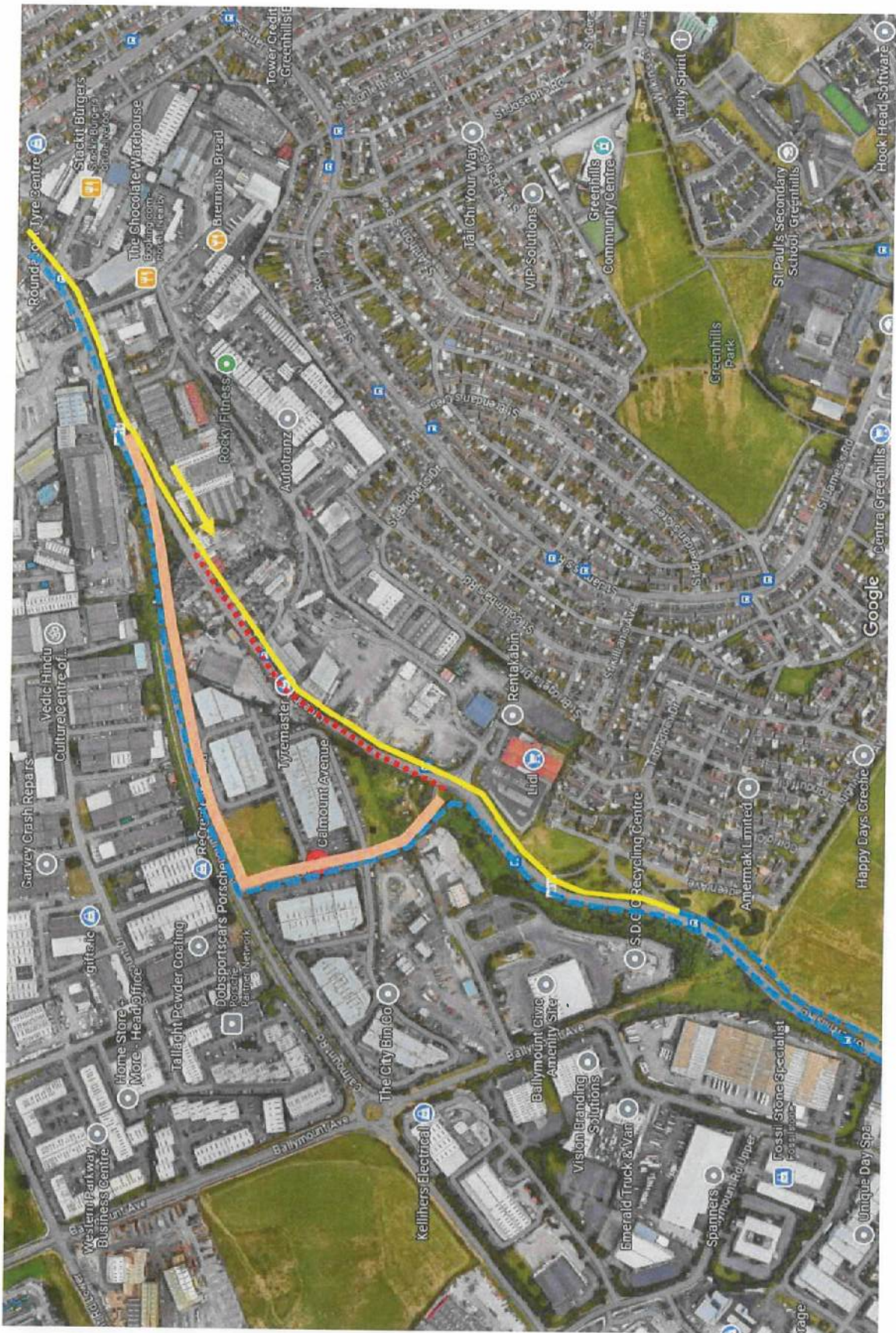


Figure 2: Alternative Proposals for Core Bus Corridor Scheme
Provided by Stephen Reid Consulting Traffic and Transportation