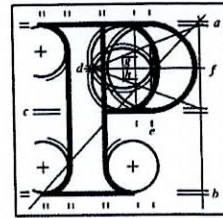


Our Case Number: ABP-313892-22

Your Reference: Tesco Ireland Limited



**An
Bord
Pleanála**

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

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Tel	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 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

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

AN BORD PLEANÁLA	
LDG- _____	Santry Avenue Industrial Estate,
ABP- _____	Santry Avenue,
12 JUL 2023	
Fee: € _____	Type: _____
Time: 12:10	By: HAND

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

Email: admin@rmla.ie
Date: 12th July 2023

Dear Sir/Madam,

**Re: Bus Connects Blanchardstown to Dublin City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre**

An Bord Pleanála Ref. No. 313892-22

We, RMLA, are acting for our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, County Dublin to prepare this submission in response to the submission, dated 31st January 2023, received from the National Transport Authority (hereafter 'NTA') on the abovementioned scheme.

Please note that going forward **all correspondence in relation to this submission should be sent to the Agents, RMLA**, 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 as well as indirect economic and social activity. In this regard, our client welcomes this opportunity to further engage with the NTA and ABP in respect of the preparation of the BusConnects Scheme.

Prussia Street

As highlighted in our client's previous submission, Tesco operate a store at the Park Shopping Centre, Prussia Street. The interventions as proposed along and within the vicinity of Prussia Street will have significant impacts on the accessibility and operational requirements of the Centre. It is proposed under the current scheme for bus gates to be introduced on the Old Cabra Road and at the junction of Prussia Street and Aughrim Street, resulting in local traffic only being permitted through these bus gates in which *"the bus gates will prohibit non-residential access for private vehicles only permitting access to public transport, walkers and cyclists."*

As stated in our previous submission, the interventions proposed at this location including bus gates, revised junction layouts and restricted movements will reduce the accessibility for customers and delivery/service vehicles travelling to the Park Shopping Centre. As such, this will have a direct impact on customer behaviour, and they will seek alternative options to meet their shopping needs, thereby, jeopardising the viability of the anchor tenants and smaller units within the Park Shopping Centre. It is considered that it is not practical or feasible for most consumers undertaking weekly convenience

shopping, which can weigh up to 35kg, to use public transport. The private car is, therefore, often necessary for such trips and the loss of access for customers availing of the private car in retail developments cannot be justified.

The proposed bus gates and local access only will result in increased traffic using primarily residential streets to access the centre and HGV's using a more circuitous, longer and inappropriate route to facilitate deliveries. As such it is requested that the existing two-way system on Prussia Street is maintained, thereby facilitating direct access to the Shopping Centre and allowing larger vehicles to continue to use the established Dublin City Council designated HGV route (see Figure 1).

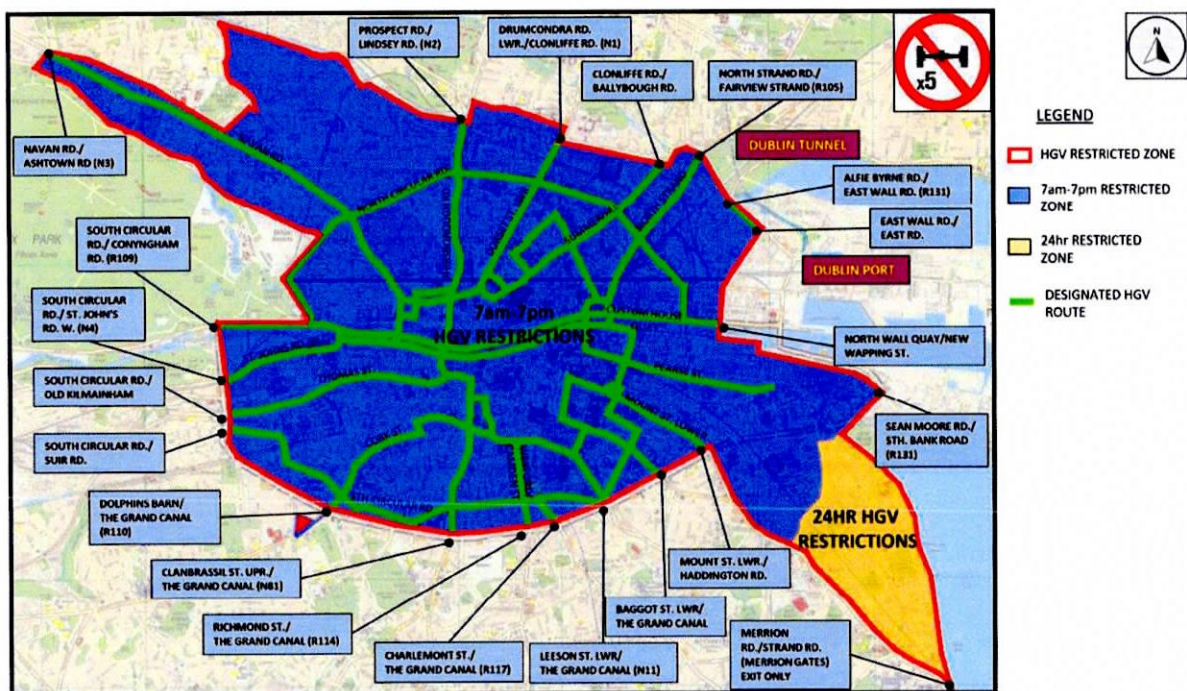


Figure 1: HGV Restrictions Dublin City Council

Furthermore, Tesco operates a central distribution system for deliveries, this form of delivery system is currently operated by all the main supermarket chains and is an exemplar in terms of transportation management and environmental sustainability. This system is environmentally sustainable as it allows for a single truck to provide multiple stores with a range of products which, in the absence of this system, would require several separate truck deliveries. Tesco supports transport improvement schemes and encourages sustainable modes of transport, from customer and staff journeys to HGV deliveries.

However, deliveries, and in particular early morning deliveries, are an important aspect of the central distribution system and must be protected. Such deliveries not only ensure consistent product quality and availability, but also reduces the number of delivery trucks on the road network at peak times, when traffic congestion is at its highest. In order to accrue all the benefits of the central distribution system, from product availability to a reduction in the number of delivery vehicles on the roads, restrictions on deliveries must be avoided.

As outlined in our client's previous submission, should the existing HGV route remain, a single truck can service both the Tesco superstore located on the Navan Road and Prussia Street via Old Cabra Road. The introduction of a bus gate on the Old Cabra Road will mean that this logistics strategy would no longer be available. Our client has assessed the option of a HGV travelling from the Navan Road along the Cabra Road (R147) and turning right onto the North Circular Road (R101) at St. Peters Church, however, it is not considered that that a HGV could safely make this turning manoeuvre (see Figure 2).

Furthermore, regarding the exiting of the Centre, there is currently a 3.5 tonne weight restriction on the R806 Blackhorse Avenue. As such, it appears the only plausible exit route for HGVs is via the N4/M50 junction as shown below (see Figure 2). This adds a lot of vehicle kilometres for Tesco delivery vehicles and more so, it will add a lot of traffic into city centre locations due to the turning bans being proposed. This conflicts greatly with the premise of the BusConnects scheme which aims to remove/reduce vehicles, particularly around the city centre. As a result, convoluted routes will be required for delivery, servicing, and commercial vehicles.

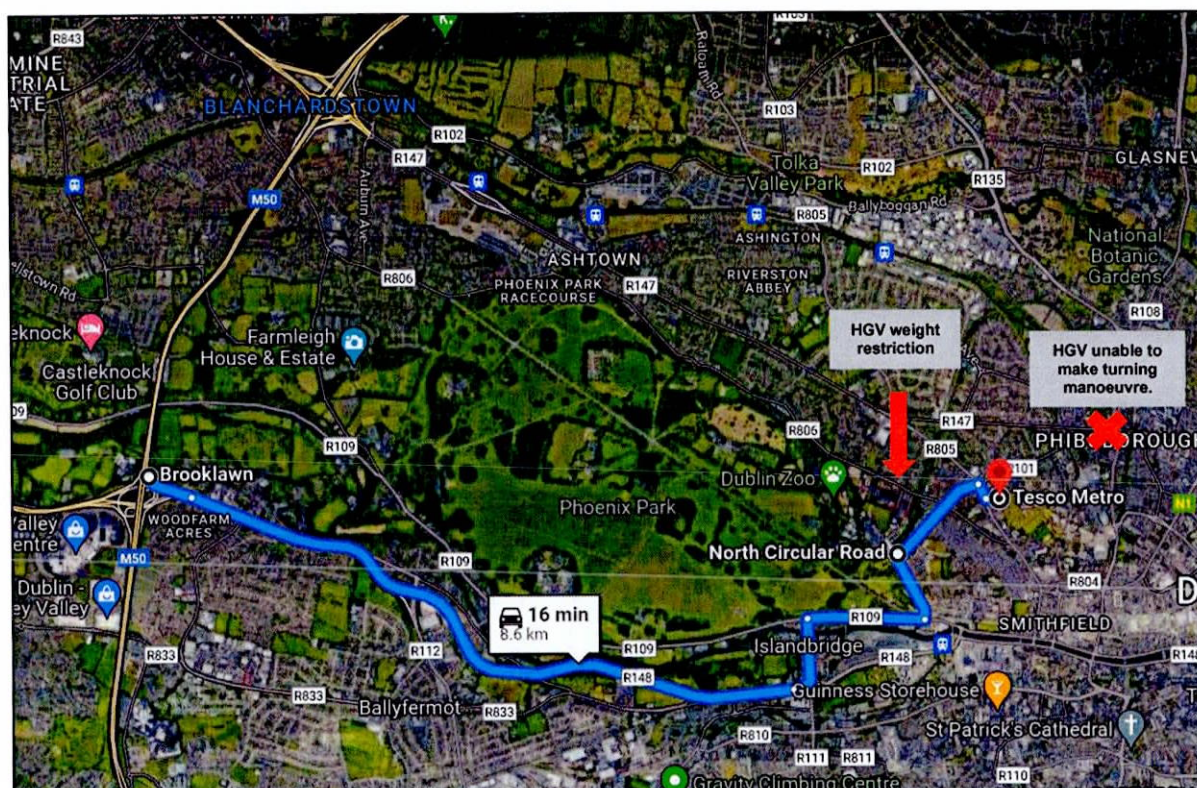


Figure 2: Resulting HGV Route to Prussia Street Store due to interventions

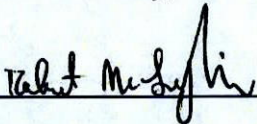
The current proposal removes the access route to the Prussia Street store, and the Tesco Central Distribution Team have considered alternative routes, but none are practical as highlighted above. The current route is the most direct and safest route as it reduces HGV movements as much as practical. It is respectfully requested that the NTA allow HGV access through the Old Cabra Road proposed bus gate at off peak times, such as between 7pm-7am, thereby facilitating safe HGV access to the Prussia Street store via a Dublin City Council a designated HGV route. In addition to the above, an alternative route via the Phibsborough Shopping Centre has been considered however this junction is already operating at capacity.

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. Our client welcomes the NTA's response; however, we would request, as part of the overall BusConnects scheme, that the importance of daily servicing and ease of customer access not be overlooked for convenience retail operates.

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,

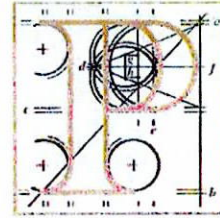


Robert McLoughlin
Managing Director
For and on Behalf of RMLA Limited

Appendix I - An Bord Pleanála Correspondence Ref. No. 313892-22

Our Case Number: ABP-313892-22

Your Reference: Tesco Ireland Limited



**An
Bord
Pleanála**

Avison Young
4th Floor
2-4 Merrion Row
Dublin 2
D02 WP23

RECEIVED 14 JUN 2023

Date: 08 June 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned proposed road development application for approval under section 51(2) of the Roads Act, 1993, as amended.

The Board has considered the case and hereby notifies you that it has decided to determine the application without an oral hearing. In this regard, please be advised that the Board has absolute discretion to hold an oral hearing and has concluded that this case can be dealt with adequately through written procedure.

Accordingly, the Board hereby considers it appropriate to invite you to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 31st January 2023 received from the National Transport Authority. A copy of the submission can be found on the Board's website at www.pleanala.ie/en-ie/case/313892 under the heading responses. This submission together with the application documentation is also available for public inspection at the following locations:

1. An Bord Pleanála, 64 Marlborough Street, Dublin 1
2. National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Any submission in relation to the above must be received by the Board within 5 weeks from the date of this letter (i.e. not later than 12th July 2023). No additional fee is required for making a submission. As there are a number of busconnects applications with the Board for approval, you are requested in your response, if any, to provide the following:

- (a) The reference number ABP-313892-22
- (b) Your name and address
- (c) The name and address of the person you are acting on behalf of.

Tell	Tel	(01) 858 8100
Glaos Áitúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

If you have any queries in relation to the 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,



Eimear Reilly
Executive Officer
Direct Line: 01-8737184

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