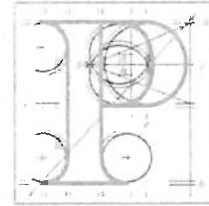


Our Case Number: ABP-316828-23
Your Reference: Calmount Holding Limited



An
Bord
Pleanála

Tom Phillips & Associates
80 Harcourt Street
Dublin 2
D02 F449

Date: 03 April 2024

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 letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this 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,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Teil (01) 858 8100
Glaó Áitiúil LoCall 1800 275 175
Facs (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

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 3 April 2024 09:30
To: Sine Kelly
Subject: RE: Submission - Refs. ABP-316828-23 & ABP-317070-23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Sine Kelly <sine@tpa.ie>
Sent: Tuesday, April 2, 2024 3:11 PM
To: LAPS <laps@pleanala.ie>
Subject: Submission - Refs. ABP-316828-23 & ABP-317070-23

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it concerns

Please find attached a submission in response to the NTA's responses to the Third Party Submissions made in relation to the Tallaght / Clondalkin to City Centre Core (TC to CC) Bus Corridor Scheme (Ref. ABP-316828-23) and its associated CPO (Ref. ABP-317070-23) being made on behalf of our Client, Calmount Holdings Limited.

I would appreciate acknowledgement of your receipt of this submission at your earliest convenience.

Kind regards

Sine

Sine Kelly
(pronounced: shee-na)
Associate

Tom Phillips + Associates
Town Planning Consultants



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Tom Phillips and Associates Limited: Dublin and Cork

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Tom Phillips + Associates Limited. Registered in Ireland No. 353333, 80 Harcourt Street, Dublin 2, D02 F449

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Monday, 2nd April 2024
[By email laps@pleanala.ie]

Dear Sir / Madam

Re: Submission in respect of the NTA's Responses to Submissions Received in respect of the Application for a proposed road development for the Tallaght / Clondalkin to City Centre Bus Corridor Scheme and associated Compulsory Purchase Order.

Application ABP Reference ABP-316828-23

CPO ABP Reference ABP-317070-23

- CPO Ref.: Plot Lists 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 Associates¹ has been retained by Calmount Holdings Limited² to make this submission in response to the NTA's responses to the Third Party Submissions made in relation to the Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme and its associated CPO. This Submission is made in response to two letters received from An Bord Pleanála in respect of the Application (Ref. ABP-316828-23), dated 26th February 2024, and the CPO (Ref. ABP-317070-23), also dated 26th February 2024.

Whilst not in the control of the NTA, our Client is disappointed that no Oral Hearing will be undertaken by the Board in relation to either the Application or CPO.

We have reviewed the contents of both the *NTA Observations on the Proposed Scheme Submissions*, dated September 2023 and *NTA Observations on the Proposed Scheme CPO Objections*, dated September 2023. Whilst we note the contents of both documents, our Client continues to have concerns regarding the details of the Application and CPO. It is our opinion that the concerns originally raised have not been addressed in full.

- The Proposed Scheme continues to not appear to have engaged properly with the City Edge Project: We acknowledge the points raised by the NTA and would be of the opinion that when the City Edge Project plan-making process is properly commenced it can include the proposed Bus Connects scheme as currently proposed, in the Plan. However, as we wait for Bus Connects to be determined by ABP, we also must wait for the City Edge Project formal plan-making process to be commenced and so this creates uncertainty for our Client – we continue to argue that the Scheme and the CPO are premature pending that Plan's adoption.

¹ 80 Harcourt Street, Dublin 2, D02 F449.

² 31-32 Greenmount Office Park, Harolds Cross Bridge, Dublin 6W.



Note that there may be contradictions between Bus Connects and the CESF. For instance, one of the three proposed "new links" (specifically new link 3) is located adjacent Block H 'community park' designation on the CESF, with the NTA stating that this link will be vehicular to give access to local business. CESF implies that this link and similar "inner roads to be car free with the exception of emergency access & servicing" and it is unclear yet if CESF envisages this link to be vehicular. As such, Bus Connects may impact negatively on the vision of the CESF and its subsequent Plan.

The proposed bus corridor also has an intersection with a proposed greenway and is located on a 'minor link street'. The potential impact on this envisaged greenway and associated 'community park' has not been taken into consideration in the Bus Connects scheme. Further, if the 'community park' is not designated in the future statutory City Edge Plan, we continue to query the impact of the proposed development on that site's potential future development.

- Future Development Potential (specifically the two undeveloped sites): The NTA's response is brief in this regard, and links it with the response provided for 'impacts on the business park not being fully considered'. The core of the argument is referring to various sections of the EIAR submitted. However, after reviewing the response provided it appears that the future development potential remains unaddressed in any significant detail.

The concluding statement says: "in summary no negative impacts on the operations of the business park are predicted in the EIAR" but the only factors considered are the noise (which was determined to have a slight long-term impact) and the new links improving the road network in the vicinity.

- Land Use not Considered as per the EPA Guidelines: This is addressed by the NTA in their submission, which presents the argument that land use is addressed and assessed where appropriate in the EIAR. Specific reference is drawn to Chapter 4 which covers it under the heading "land use and accommodation works" and this is cross-referenced in Sections 10.4.3.1 and 10.4.3.2.2 of Chapter 10 and Section 11.4.3 of Chapter 11 of the EIAR. Reference is drawn to the fact that "no impact on health arising from land take" is anticipated in the EIAR.

However, nothing addressing the impact of emissions, traffic congestions/pollution etc. on the sensitive receptors is specifically mentioned. We continue to have concern that a potential significant impact will arise 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.

In conclusion, it is submitted that sufficient information has not been provided and that the arguments presented in the original submission should still be considered in the Board's assessment of the scheme.

We trust that our Client's continued concerns will be given due consideration by the Board in its assessment of both the Application and CPO.

Our Client would welcome the opportunity for further engagement with NTA, including during the Board's assessment of both the application and the CPO, and beyond these stages at construction and operation phases. This is particularly important given that Oral Hearings will not be held in relation to the Application or CPO.



Yours sincerely

Gavin Lawlor

Director

Tom Phillips and Associates