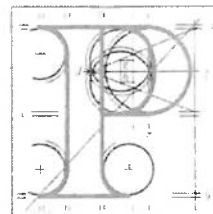


Our Case Number: ABP-316828-23
Your Reference: Killeen Motor Group



An
Bord
Pleanála

John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

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	Tel	(01) 858 8100
Glaó 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

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 3 April 2024 09:27
To: 'bcoughlan@johnspainassociates.com'
Subject: RE: Tallaght/Clondalkin to City Centre Bus Connects Corridor Scheme (ABP-316828)

A Chara,

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

Kind regards,

Lauren

From: Brian Coughlan <bcoughlan@johnspainassociates.com>
Sent: Tuesday, April 2, 2024 2:07 PM
To: LAPS <laps@pleanala.ie>
Subject: Tallaght/Clondalkin to City Centre Bus Connects Corridor Scheme (ABP-316828)

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.

Good afternoon,

Please find enclosed a submission to the Tallaght/Clondalkin to City Centre Bus Connects Corridor Scheme (ABP-316828).

The submission is by John Spain Associates, 39 Fitzwilliam Place, Dublin 2, on behalf of: Killeen Motor Group UC, Lexus House, Killeen Road, Dublin 12.

Can you please confirm receipt.

Regards,
Brian

Brian Coughlan
Senior Associate Director
John Spain Associates,
39 Fitzwilliam Place,
Dublin 2.
D02 ND61

M: 0876407881
T: 016625803
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 **John Spain Associates**
Planning & Development Consultants
Chartered Town Planners

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

laps@pleanala.ie

Date: 2 April, 2024
Our Ref: TBC BC

Dear Sir / Madam,

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

John Spain Associates are instructed by Killeen Motor Group UC 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 response follows correspondence received from An Bord Pleanála on 26th February 2024 indicating that an Oral Hearing is not proposed for the application and welcoming submissions by 5.30pm on 2nd April 2024.

Background

Killeen Motor Group UC, through Virtus, made a submission on 4th July 2023 in respect of the proposed development. The key issues raised in this submission were as follows:

"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 Nanqor 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.

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

NTA Response

The NTA's response is set out in NTA Observations on the Proposed Scheme Submissions (September 2023).

The NTA response summarises our Client's submission in three points:

- Proposals welcomed
- Lands to be secure and accessible at all times during construction
- Request for omission of new trees and query concerning the location of the proposed hedge

It is not considered that the NTA have responded satisfactorily to our Client's concerns relating to two points:

- security of the site during construction, and
- impact that the proposed London Plane trees will have on the existing use of the site as new car storage.

These points are expanded upon below.

Submission

As noted above, concerns remain in relation to the impact of the proposals on site security during construction and the impact of 8 London Plane trees on the use of the site as a storage facility for new cars.

Boundary wall and site security

In response to this point, the NTA have quoted sections of the EIAR and CEMP which relate to access being maintained to lands where practicable. Reference was also given to the section of the EIAR which relates to the final boundary treatments. This section concludes: *"In summary, arrangements will be made on a case by case basis to maintain continued access to businesses affected by the works at all times, where practicable. In addition, measures will be put in place by the appointed contractor to provide adequate security of construction works"*.

As noted above, our client's lands are used for the storage of vehicles before their distribution to dealerships. Maintaining the security of this site is of the utmost importance.

The NTA's response does not point to any element of the application which would ensure that there is a requirement on them to work with the Killeen Group to keep their site secure during the construction phase.

It is therefore requested that a condition is added to the grant of permission to ensure that the applicant is required to ensure that our Client's lands are secure at all times. This should be through the provision of on site security, and 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

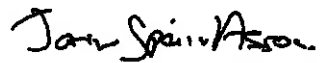
The application proposes a number of London Plane trees along the site boundary with our Client's lands. The use of the site is for the storage of new vehicles. The proposed London Plane trees will attract birds and will cause sap, leaves and bird droppings to fall on the new vehicles stored on site. 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.

The NTA response refers to the planting strategy but does not refer to our client's concerns about the impact of the trees on the use of the site.

It is requested that the trees bounding our Client's lands to the south are omitted from the scheme by condition. A hedgerow is proposed which will screen the site without the negative impacts associated with these trees.

To conclude, it is considered that our Client's concerns are reasonable. Minor changes to the scheme will ensure that the site is secure during construction and the site remains usable in the long term. Recent permissions for other BusConnects schemes have used conditions to address site specific concerns (e.g. 314056: conditions 6 and 9; 313182: conditions 6 and 7; and 314610: conditions 4 and 5). It is requested that a similar approach is used in this case to address our Client's concerns.

Yours sincerely,



John Spain
Managing Director John Spain Associates Ltd.