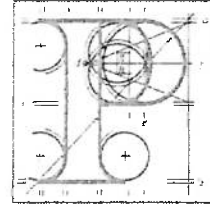


Our Case Number: ABP-316828-23

Your Reference: Maxol Limited



**An
Bord
Pleanála**

RW Nolan & Associates
Basement Office
54 Fitzwilliam Square North
Dublin 2

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 1800 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Riomhphost bord@pleanala.ie

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

Lauren Griffin

From: Lauren Griffin
Sent: Tuesday 2 April 2024 13:18
To: 'deirdre@rwnowlan.ie'
Cc: 'robert@rwnowlan.ie'
Subject: RE: Maxol Submission Ref-316828-23

A Chara,

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

Kind regards,

Lauren

From: Deirdre Dunne <deirdre@rwnowlan.ie>
Sent: Tuesday, April 2, 2024 11:45 AM
To: LAPS <laps@pleanala.ie>
Subject: RE: Maxol Submission Ref-316828-23

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.

Dear Sir/Madam,

Hope you are well. Would it be possible to get a confirmation email that our submission (Maxol Submission Ref-316828-23) was received by An Bord Pleanala.

Kind regards,

Deirdre Dunne
Basement Office
54 Fitzwilliam Square
Dublin 2

Main Office Number: 01 8733627

Email: deirdre@rwnowlan.ie
Website: www.rwnowlan.ie

“Where Planning Meets Property”

RW Nowlan
& Associates
Chartered Planning & Property Advisors

From: Robert Nowlan <robert@rwnowlan.ie>
Sent: Tuesday, April 2, 2024 10:35 AM
To: laps@pleanala.ie
Cc: Deirdre Dunne <deirdre@rwnowlan.ie>
Subject: Maxol Submission ReF-316828-23

To whom it may concern,

Please find enclosed our client's submission on the Tallaght/Clondalkin to City Centre Busconnect Bus Corridor Scheme following an invitation by An Board Pleanala on the 26th of February 2024

We would appreciate if the Inspector takes into consideration our clients concerns and the major impacts this scheme will have for the Longmile Road Maxol Facility.

Regards

Robert Nowlan
BSc(Surv), MPP, MRTPI, MIPI, MSCS, MULI)
Managing Director

No.54 Fitzwilliam Square,
Dublin 2
Phone: 01-8733627
Email: robert@rwnowlan.ie
Website: www.rwnowlan.ie

"Where Planning Meets Property"



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PROJECT NO. 44.03.2024



PLANNING RESPONSE

Submission on the proposed
construction of the Tallaght / Clondalkin to
City Centre Core Bus Corridor

ON BEHALF OF:

APRIL 2024

RW Nowlan & Associates | Basement Office, 54 Fitzwilliam Square North, Dublin 2 | Company Reg. No. 565476 Director- Robert Nowlan | Tel: +353 01-8733627 | robert@rwnowlan.ie

1.0 INTRODUCTION

1.1 A submission was made on the proposed 'Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme' on behalf of Maxol Ltd. The National Transport Authority (NTA) prepared a report which contains the observations on this and other submissions that were made in relation to the scheme. This submission is in response to the invitation by An Bord Pleanála to make submissions or observations on the report 'NTA Observations on the Proposed Scheme Submissions.'¹ The submission is made on behalf of Maxol Ltd, 3 Custom House Plaza, 4th Floor, IFSC, Dublin 1

2.0 GENERAL

2.1 The submission on behalf of Maxol Ltd. is listed in the report as submission no. 46 and a response to the submission is stated on pages 160-170 of the report. This submission refers to these pages in the report.

¹ NTA Observations on the Proposed Scheme Submissions, September 2023.

3.0 CYCLISTS ARE UNLIKELY TO USE THE RAMP AND BRIDGE

3.1 The submission on behalf of Maxol Ltd. stated that cyclists will have to travel a significant longer distance compared to crossing by the existing at-grade signals and that cyclists are more likely to follow existing at-grade crossing routes.²

3.2 The response by the NTA is contained in section 2.6.3.3 of the report. It is stated that the proposed footbridge will provide the following advantages for pedestrians and cyclists³:

- It provides a more reliable and direct crossing facility for pedestrians and cyclists.
- It improves significantly the safety of pedestrian and cyclists.

-
- It will make for a significantly more pleasant journey for pedestrians and cyclists using the junction.

Furthermore, it is stated that ...”the at-grade crossing points referred to by the submission will not be available as option for pedestrians and cyclists, with the proposed ramps, steps and bridges providing the only available route.”⁴

3.3 With respect, the response stating that the at grade crossings will no longer be available is in effect ruling out a design option that should be considered by the Board as an alternative to the proposed footbridge. There is no reason why the bus corridor can't be achieved while retaining existing at grade crossing points for pedestrians and cyclists.

² Submission, R W Nowlan & Ass. July 2023.

³ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 164.

⁴ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 165.

⁵ Submission, R W Nowlan & Ass. July 2023.

4.0 IMPACT OF THE PROPOSED PEDESTRIAN BRIDGE ON VISIBILITY OF THE PETROL FILLING STATION

4.1 The submission on behalf of Maxol Ltd. stated that the proposed pedestrian Bridge and Bridge Ramp will reduce the visibility of the petrol filling station and detract from the visual amenity of the area.

The submissions asserts that the petrol filling station forms a clear and distinctive visual landmark.⁵

4.2 The response by the NTA is contained in section 2.6.3.3 of the report and it refers to the EIAR without making a specific response to the points made in the submission.⁵

4.3 The proposed curved ramp structure would result in a significant scale structure that would be right in front of the petrol filling station. The ramp structure would not only reduce the visibility of the petrol filling station but also detract from the visual amenity of the area. The road junction is an important traditional landmark in the city of Dublin and the petrol filling station forms a clear and

distinctive visual landmark marking the well known V-shaped junction between two important radial routes into the city. The curved ramp structure would seriously injure the visual amenity of the area as it would block views of the petrol filling station that currently provides a landmark in the junction between the two radial routes into the city.

5.0 PROXIMITY OF THE FOOTBRIDGE RAMP TO OPERATIONAL FACILITIES

5.1 The submission on behalf of Maxol Ltd. stated that the proposed pedestrian Bridge and Bridge

⁵ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 166.

Ramp is in close proximity to the existing petroleum vent stack, the vapour recovery pipe and the offset fuel delivery points.

5.2 The response by the NTA is contained in section 2.6.3.3 of the report and measures are outlined to ensure that adequate compliance with safety regulations can be achieved, inter alia, by raising the height of the vent stack and providing a steel mesh enclosure of the bridge and ramp. In addition, it is stated that the NTA will continue liaising with the landowner following any approvals to address any further safety concerns relating to the operation of the filling station.⁶ This response is noted.

6.0 LACK OF CLARITY IN RELATION TO CYCLE LANE ALONG NAAS ROAD FRONTAGE

6.1 The submission on behalf of the Maxol Ltd. stated that clarification was needed whether any land take along the Naas road frontage of the petrol filling station is required having regard to the fact that the scheme does not propose any changes in the division of traffic lanes or the width of the existing road.⁸

6.2 The response by the NTA is contained in section 2.6.4.3 of the report and it is stated that along the Naas Road frontage, a strip of land is required to be permanently acquired to facilitate construction

of the footpath of the Proposed Scheme, as well as to tie-in the existing petrol filling station access and egress.⁷

6.3 While this clarification is noted, it is important to point out that this land acquisition will result in the loss of the only area of landscaping for the petrol filling station. See fig. 2.6.3.15 in the NTA response report.¹⁰ While the

⁶ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 168.

⁸ Submission, R W Nowlan & Ass. July 2023.

⁷ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 170.

land acquisition may not have a significant impact on business operations, the loss of the grassed area along the Naas road frontage is regrettable as it may create difficulties in realising Maxol's planning proposals for developing the site. The retention and enhancement of landscaping is a requirement by the planning authority. The achievement of adequate landscaping in development proposals for the existing petrol filling station, is made more difficult by the loss of this grassed area.

7.0 CONCLUSION

- The curved ramp structure would seriously injure the visual amenity of the area as it would block views of the petrol filling station that currently provides a landmark in the junction between the two radial routes into the city. The NTA fails to respond to this concern.
- The achievement of adequate landscaping in development proposals for the existing petrol filling station, is made more difficult by the loss of the grassed area along the Naas Road site frontage.
- The NTA response report assumes that the construction of a footbridge is the only way of allowing traffic circulation for slow modes (pedestrians and cyclists) across the road junction. This is not accepted. Given the tortuous route for cyclists in particular, the proposed solution is far from cyclist friendly. There is no reason why the bus corridor can't be achieved while retaining existing at grade crossing points for pedestrians and cyclists.
- Concerns can be significantly reduced by omitting the proposed footbridge structure with accompanying ramps. An Bord Pleanála is urged to include in any decision to grant approval

for the proposed bus corridor a condition that requires the omission of the proposed footbridge in favour of traffic lights for pedestrian and cyclists.

¹⁰ NTA Observations on the Proposed Scheme Submissions, September 2023, p. 170.