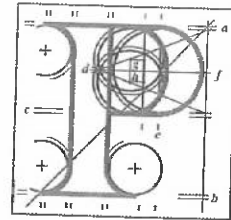


Our Case Number: ABP-317121-23

Planning Authority Reference Number:

Your Reference: Brendan Collins



**An
Bord
Pleanála**

Hughes Planning
85 Merrion Square South
Dublin 2
D02 FX60

Date: 20 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

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,



Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

Teil
Glaao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

AN BORD PLEANÁLA

LDG- 066436-23

ABP- _____

12 SEP 2023

Fee: € 50 Type: CHQ

Time: 17:14 By: Amel

Swords to City Centre Core Bus Corridor Scheme Submission (Ref. No. 317121)

Submitted on Behalf of:

Brendan Collins

Collinstown House, Collinstown Business Park, Swords Road, Swords, Co. Dublin

12th September 2023

85 Merrion Square, Dublin 2, D02 FX60

+353 (0)1 539 0710

info@hpdc.ie

www.hpdc.ie

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, Brendan Collins, to make a submission in respect of the Swords to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA).

This submission, which is accompanied by the relevant submission fee (€50), is made in response to a public notice, available at <https://swordsscheme.ie/>, inviting submissions, up until 12th September 2023, as part of a public consultation process on the route corridor (Ref. No. 317121). The purpose of this submission is to outline our client's concern to ancillary works proposed as part of the subject scheme.

We note the map which presents the location of the route corridor options as presented in Figure 1.0, below.

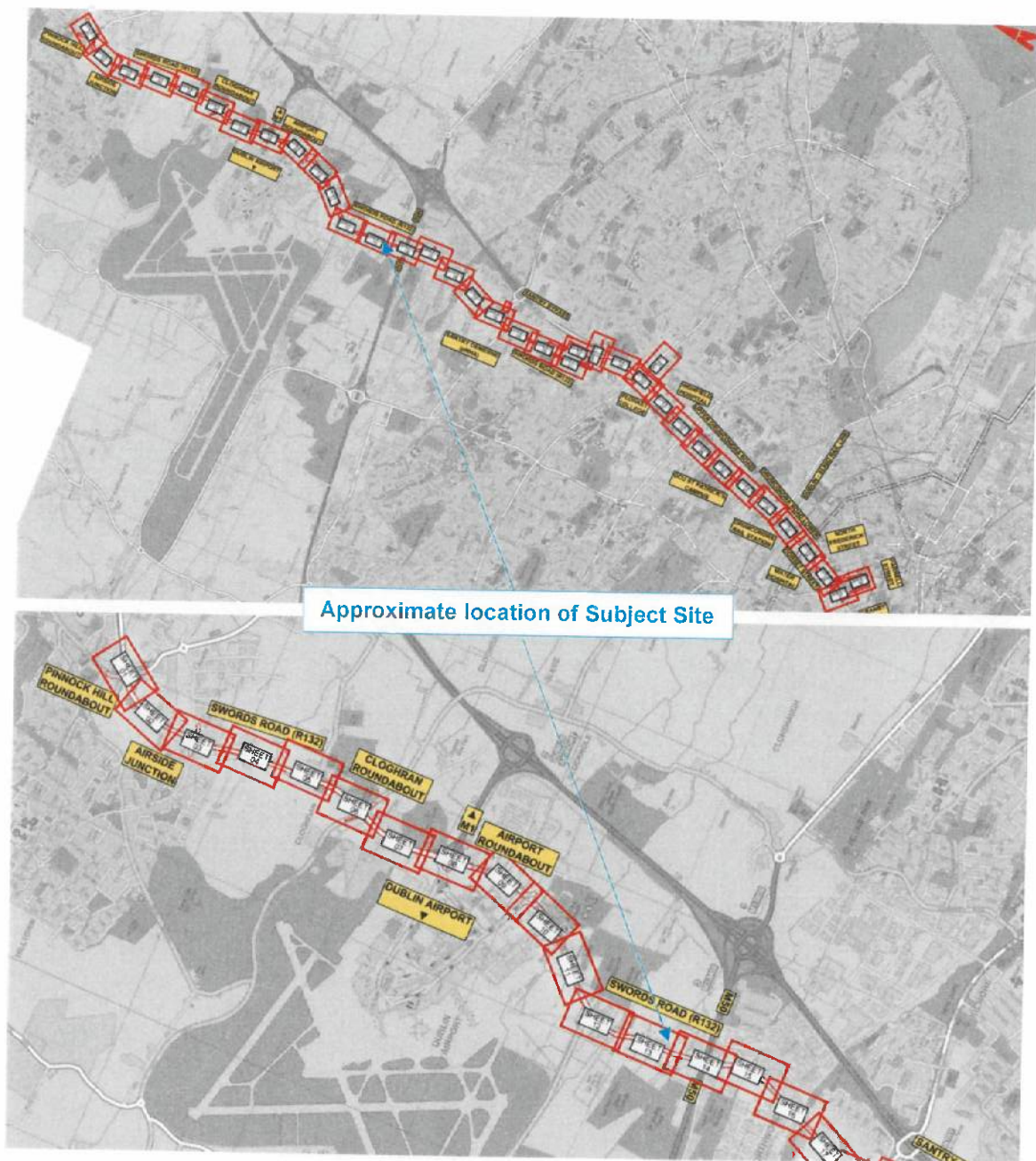


Figure 1.0 Extracts from the proposed scheme boundary illustrating the location of our client's site (blue outline) relative to the intended route option.

2.0 Subject Site

The site to which this submission pertains is located to the south of Dardistown Cemetery. The site fronts onto the Swords Road (R132) and extends eastwards for c. 700m, ultimately presenting road frontage to the M1 Motorway.

Most of the site is occupied by Collinstown Business Park with a significant area of hardstanding accommodating a variety of business operations (**162** no. commercial tenants in total) including logistics, vehicle storage, motor-home rental, coach services, tyre services, fuel suppliers, civil engineering consulting, window suppliers and upholstery. The business park operates 24 hours a day whilst the wider site also accommodates 2 no. residential properties with our client also in the ownership of the residential property to the immediate south of the existing site entrance/exit point. Appendix A of this report provides a list of the extensive number of commercial tenants of Collinstown Business Park.



Figure 2.0 Aerial images showing the immediate (top) and wider (bottom) locational context of the subject site (red outline).



Figure 3.0 Street-view images of the subject site, showing the main entrance (top), the residential property to the immediate south of the main entrance (bottom) and internal access roads, hardstanding and commercial premises (bottom).

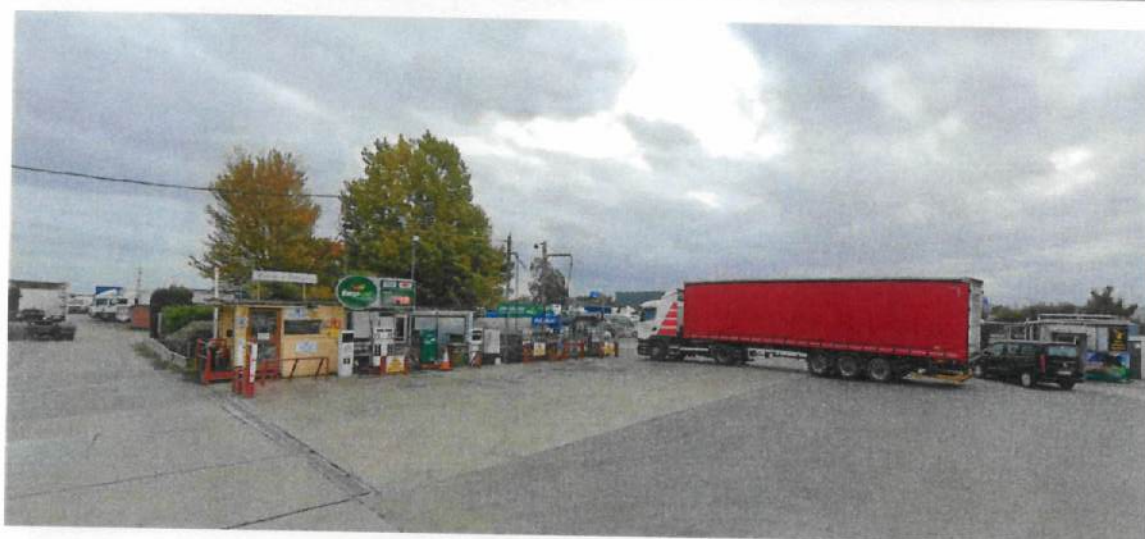


Figure 4.0 On-site images illustrating hardstanding areas and various commercial operations including fuel services and car rental.

3.0 Site Planning History

A review of the Fingal County planning register has identified several historical planning applications relating to the subject site as detailed below.

- Reg. Ref. 92A/2000** Planning permission was refused by Fingal County Council on 15th February 1993 for the retention of existing structure and change of use to light industrial office and storage use of existing premises and installation of foul water treatment system.
- Reg. Ref. 92A/1597** Planning permission was granted by Fingal County Council on 8th January 1993 for minor revisions to front elevation revised internal layout with utility and sunroom additions to already approved permission for dormer bungalow
- Reg. Ref. 93A/0059** Planning permission was granted by Fingal County Council on 29th April 1993 for extension to rear of already approved house plan for dormer bungalow
- Reg. Ref. F94A/0212** Planning permission was granted by Fingal County Council on 8th July 1994 for the extraction of 500,000 cubic metres of fill material from 22-acre site.
- Reg. Ref. F97A/0987** Planning permission was granted by Fingal County Council on 28th January 1998 for the retention of a canteen facility.
- Reg. Ref. F97A/0961** Planning permission was granted by Fingal County Council on 28th January 1998 for the retention of a canteen facility.

It is submitted that the subject site is operating lawfully under its historically permitted planning applications, and we note historical imagery from google earth confirming no change to the extent of development on site.



Figure 5.0 Google earth image – October 2002.



Figure 6.0 Google earth image – July 2008.



Figure 7.0 Google earth image – May 2013.



Figure 8.0 Google earth image – May 2017.



Figure 9.0 Google earth image – April 2020.



Figure 10.0 Google earth image – April 2021.



Figure 11.0 Google earth image – September 2023.

Whilst we note the extent of planning history available for review in the Fingal Planning register and modern google earth imagery of the site, it is considered prudent to confirm that the existing business park was initially established in 1947 as a haulage business before being expanded in 1969 to include a variety of additional commercial operations.

It is further noted that the original vehicular entrance to the site was upgraded in 1979, to what exists on site today, following consultation with Dublin County Engineers. Currently there are two exiting lanes and a wide entrance lane area to accommodate large HGVs, buses and coaches entering and exiting the access. There is also a dividing barrier between the inbound and outbound lanes to prevent vehicles entering the access from Swords Road and using it to u-turn in the bellmouth area, and some flexipost bollards and associated signage to advise that there is to be no parking in the area between the Swords Road and the setback access gate.



Figure 12.0 Street view images of the entrance/exit arrangement as dated.

4.0 Bus Connects Proposal Relative to Subject Site

As per the documentation available at <https://swordsscheme.ie/>, the Swords to City Centre Core Bus Corridor Scheme will have a significant impact upon our client's site as follows:

1. Significant extent of land acquisitioned for temporary use – directly compromising the short-term accessibility of Collinstown Business Park; and
2. Revised entrance arrangement to Collinstown Business Park – compromising the long-term accessibility of Collinstown Business Park

Further to the above, the scheme will also provide for a significant revision of existing boundary treatments/planting between the subject site and the adjoining road network along its western boundary.

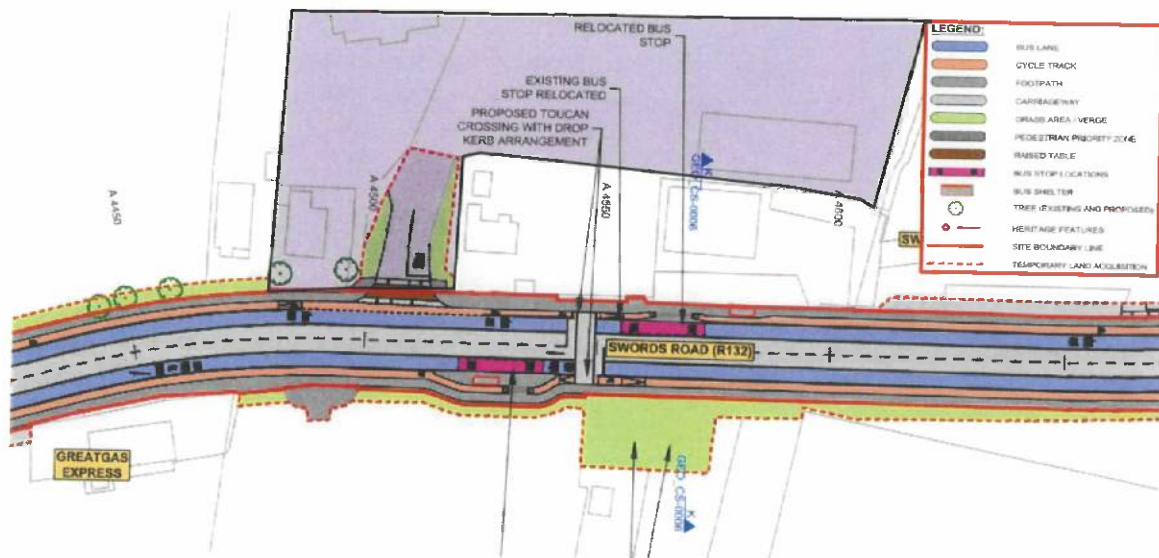


Figure 13.0 Extracts from Sheet 13 of the General Arrangement drawing illustrating the proposed works relative to our client's site (purple fill/black outline).

Whilst we would confirm our client's support for the subject proposal, in the context of improving the immediate area's access infrastructure together with associated improvements to the visual amenity of the immediate area, it is considered that the above concerns together present a material rationale for the seeking of compensation in the event that the National Transport Authority does not see fit to make appropriate amendments to the subject scheme to ensure no detrimental impact to our client's commercial operations and the associated monetary value of same.

5.0 Impact of Bus Connects Proposal on Subject Site

Having regard for the nature of the proposed works and the proximity of these works to our client's site, we would consider the Swords to City Centre Core Bus Corridor Scheme to present direct impacts to the commercial attractiveness of our client's property and, by association, the value of this property.

The following sections of this report will expand upon the impacts which will occur because of the aforementioned scheme.

5.1 Temporary Land Acquisition

As detailed on the applicable general arrangement drawing, a significant area of land contained within the entrance/exit point to our client's wider landholding is to be the subject of a temporary land acquisition. It is noted, upon review of the wider documentation prepared by the NTA that no clarity has been provided as to either an expected time period for when the temporary land acquisition will begin or the length of time the land will be subject to the temporary acquisition.

This lack of clarity is detrimental to ensuring the efficient operation of Collinstown Business Park as the impact of the land acquisition on the entrance/exit point to the Business Park cannot be determined. Moreover, no information can be relayed to commercial tenants of the business park who each have different requirements in terms of when vehicles serving their businesses need to enter/exit the park, the size of such vehicles and the number of such vehicles which enter/exit daily.

Our client urgently requires detailed information regarding the construction management plan, which should confirm details regarding the extent of time for which land upon their site will be the subject of the temporary acquisition. The CMP should also provide details in relation to noise, dust, vibrations and any additional construction elements which may compromise the unobstructed operation of Collinstown Business Park. Until this information is received, our client remains highly concerned about the severe impact the construction phase will have on their revenues and their ability to operate during this time.

5.2 Revised Entrance Arrangement

It is considered appropriate, to best illustrate the impact of the revised entrance arrangement, to present the proposed access arrangements to Collinstown Business Park relative to the existing situation as per Figure 14.0, below.

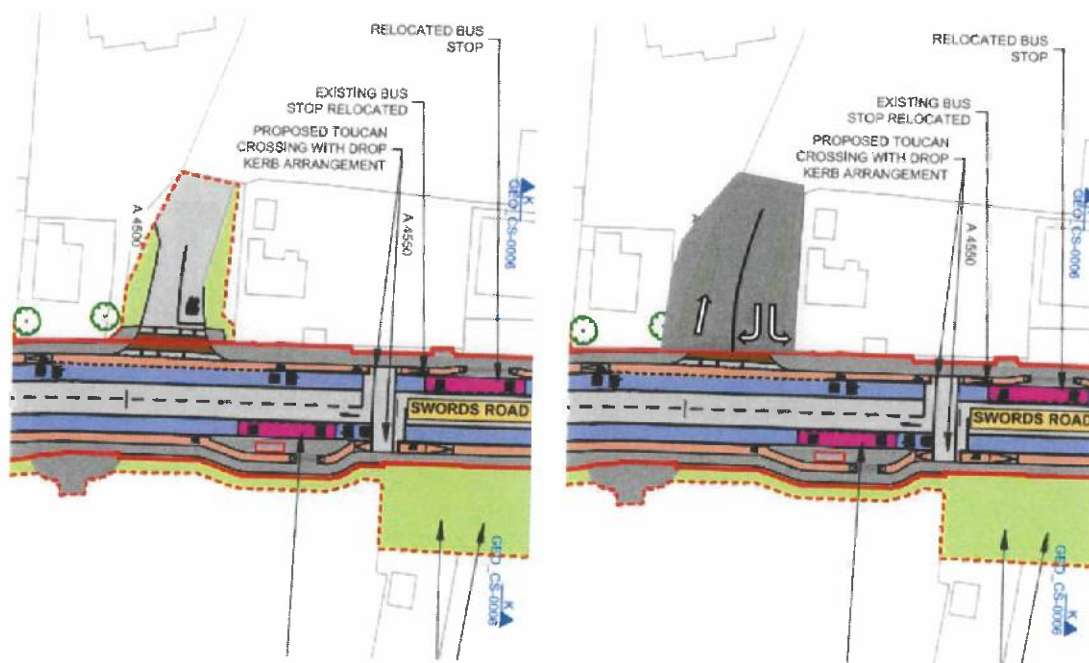


Figure 14.0 Revised entrance/exit arrangement (l) and existing entrance/exit arrangement (r).

It is considered that the revised entrance/exit arrangement provides works upon our client's site which are entirely unnecessary in the context of achieving the wider objectives of the Swords to City Centre Core Bus Corridor Scheme which notably seeks to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.

First and foremost, it is intended to remove a significant extent of existing hardstanding directly associated with the existing entrance/exit point and replace same with a large grass verge area with the extent of hardstanding to be removed conservatively estimated to amount to c. 100sq.m. It is not considered that the replacement of a significant area of hardstanding, which contributes to the daily operation of a large-scale business park, with a simple grass verge is required to achieved the primary objective of the Swords to City Centre Core Bus Corridor Scheme. The provision of a grass verge on privately owned lands well set back from the proposed car, bus, cycle and pedestrian infrastructure proposed under the scheme is considered entirely nonessential and unduly restrictive in the context of the long-standing operation of the subject business park.

Further to the replacement of hardstanding with the grass verge area, the proposed works will significantly curtail the ability of the subject site to facilitate access/exit to multiple vehicles at once through the restriction of the entrance/exit points to single lane width. The scheme drawing Sheet 13 of 37 also shows a proposed entry treatment ramp across the reduced width access, with the public footpath crossing point stepped inwards onto the flat zone area of the entry treatment ramp (so that it would be partially behind the site boundary line), and the stopline/stop road marking text has been located to the rear of the inner toe of the entry treatment ramp.

This is significant in that not only can the revised site not facilitate the entrance/exit of multiple vehicle movements, but the works could also result in vehicular queuing both upon the Swords Road and within the subject site, principally in the context of Heavy Goods Vehicles (HGVs). This will present direct impacts to both traffic flow along the Swords Road whilst compromising vehicular movement within Collinstown Business Park and impacting upon the movement of people and goods around the park. It is also considered prudent to note that the works to the entrance/exit arrangement will also affect the accessibility of our client's personal residential property which is accessed from the same vehicular gate off the Swords Road thus compromising the residential amenity of this property.

It is respectfully submitted that the existing entrance/exit arrangement to our client's site represents a significant aspect of the attractiveness of Collinstown Business Park to commercial tenants and that the subject proposal will prove detrimental to the long-term retention of tenants and the potential future growth of the business park. Furthermore, we would ask that the NTA have due regard for the enclosed letter, as prepared by Stephen Reid Consulting, which is included in Appendix B of this report. The letter considers the impact of the proposed scheme on the subject commercial operation and we would note and agree with the following commentary from this letter:

'It is disingenuous for the NTA Bus Connects promoters to claim this is a temporary acquisition when they are proposing wholesale changes to the lands in question and are not reinstating the existing arrangements before returning the lands to the permanent owners. Apart from the arbitrary nature of the proposal to alter a private development access without any form of adequate liaison and discussion with the affected party, it is noted that the proposed works would clearly impact on the existing operations of the Business Park and access to/from the dwelling (which is Mr Collins home).'

6.0 Development Plan Policy

Having regard for the previous sections of this report, it is considered clear to see that the subject proposal will compromise the residential amenity of our client. In this respect we would note that our client's site is zoned, under the current Fingal Development Plan 2023-2029, GE 'General Employment'. The subject site is also noted as being located in the Dublin Airport Noise Zone A and B as designated by Fingal County Council. This zoning provides the following objective which must be considered for any development on/adjoining such sites:

'Provide opportunities for general enterprise and employment.'



Figure 15.0 Extract from Sheet 11 of the Fingal Development Plan 2023 - 2029 showing the site (dashed red line) situated within lands subject to the zoning objective 'GE'.

The Development Plan outlines uses that are permitted in each Zoning Objective. This is to ensure that lands are used suitably as it promotes the sustainable development and proper planning of an area. Uses deemed as 'permitted in principle' are uses which the Council finds appropriate for the area. Uses permitted in principle for areas zoned as Objective 'GE' include:

'Builders Provider/Yard, Civic Waste Facility, Enterprise Centre, Food, Drink and Flower Preparation/Processing, Fuel Depot/Fuel Storage, High Technology Manufacturing, Industry – General, Industry – Light, Logistics, Office Ancillary to Permitted Use, Open Space, Petrol Station, Research and Development, Restaurant/Café, Retail – Local < 150 sqm nfa, Road Transport Depot, Sustainable Energy Installation, Telecommunications Structures, Training Centre, Utility Installations, Vehicle Sales Outlet – Small Vehicles, Vehicle Sales Outlet – Large Vehicles, Vehicle Servicing/ Maintenance Garage, Warehousing, Waste Disposal and Recovery Facility (Excluding High Impact), Wholesale'

Uses not permitted for areas zoned as Objective 'GE' include:

'Aparthotel Abattoir Aerodrome/Airfield Agri-Tourism Air Transport Infrastructure Amusement Arcade Bed and Breakfast Betting Office Boarding Kennels Burial Grounds Caravan Park – Holiday Caravan Park – Residential Concrete/Asphalt Cultural Facility Dancehall/Nightclub Education Exhibition Centre Farm Shop General Aviation Golf Course Guest House Health Practitioner Holiday Home/Apartments Hospital Hostel Hotel Industry – Extractive / Quarrying Office ≥ 1,000 sqm Place of Worship Public House Residential 28 Residential Care Home/ Retirement Home Residential Institution Retail – Comparison ≤ 500 sqm nfa Retail – Comparison > 500 sqm nfa Retail – Supermarket ≤ 2,500 sqm nfa Retail – Superstore > 2,500 sqm nfa Retail – Hypermarket > 5,000 sqm nfa Retail – Factory Outlet Centre Retail Warehouse Retail – Warehouse Club Retirement Village Sheltered Accommodation Traveller Community Accommodation Waste Disposal and Recovery Facility (High Impact)'

It is respectfully submitted that the subject site is operating lawfully with all existing commercial operations permitted in principle based on the applicable 'GE' zoning objective.

It is thus considered reasonable to request that the NTA duly consider the necessity of the proposed works upon our client's site given the potential impact of the works on the ability of Collinstown Business Park to continue to provide opportunities for general enterprise and employment. Moreover, we would note the extent of zoned land within the balance of the site which is yet to be developed.

7.0 Suggested Amendment

In relation to proposed works on site, it is our position that the existing entrance/exit arrangement should be maintained in situ insofar as the subject site does not prejudice the delivery of the primary objective of the Swords to City Centre Core Bus Corridor Scheme.

In this regard, and in the interest of safeguarding the long-standing entrance/exit arrangement to the subject site, our client would herein confirm their willingness to engage with the NTA in relation to accommodating pedestrian/cycle infrastructure and facilitating the provision of a signalised junction upon lands within their control.

8.0 Mitigation & Compensation

Having regard, for the identified issues which will compromise the accessibility of our client's property on the Swords Road, it is considered reasonable that the National Transport Authority (NTA) engage directly with our client in relation to identifying appropriate mitigation measures to ensure the safeguarding of the commercial viability of their property.

In the absence of comprehensive mitigation measures to prevent undue accessibility impacts arising as a result of the subject scheme, our client would seek compensation to offset potential impacts to the monetary value of their property.

9.0 Conclusion

In conclusion, the lack of clarity provided in relation to the temporary land acquisition sought by the NTA in conjunction with the entirely non-essential works which are proposed upon our client's site and will materially compromise the long-standing entrance/exit arrangement to Collinstown Business Park clearly render the Swords to City Centre Core Bus Corridor Scheme as incompliant with the proper planning and sustainable development of the area as it relates to our client's property on the Sword's Road.

It is considered, for the above reasoning, that the subject scheme will have significant detrimental impacts on our client's business by compromising the accessibility and attractiveness of our client's commercial premises.

In this regard, we would herein confirm our client's willingness to engage with the National Transport Authority (NTA) to identify suitable mitigation measures to ensure the adequate protection of the commercial viability of the extant commercial operations at this location. In the absence of comprehensive mitigation measures, it is considered reasonable that appropriate compensation be afforded to our client.

We trust that the Board will have regard to the contents of this submission in relation to the wider public consultation process on the Swords to City Centre Core Bus Corridor Scheme.



Kevin Hughes MIPI MRTPI
Director for HPDC Ltd.

Appendix A Commercial Tenant List – Collinstown Business Park

1. Super Mario Couriers	Office/Shed/6 Trucks/Trailers
2. Brendan Collins Coaches	Office/Container/15 Buses
3. Callanan Construction	Storage Yard
4. Dymon Ways	1 Shed/3 Trucks
5. JS Express	Office/Container/6 Trucks/Trailers
6. Lenmar Developments	Office
7. Liberty Irish Tours	Bus
8. McRent	Office/Shed/6 Campers
9. Northside Upholstery	Office/Showroom/2 Vans
10. New Vintage Transport	Office/Container/25 Trucks/Trailers
11. O'Gradys Coaches	Office/Cabin/23 Buses
12. CPR Transport	Office/Container/Van
13. SFT Transport	Office/Container/29 Trucks/Trailers
14. Voltech Electrical	Office/Container
15. ER Travel	Office/Shed/120 Cars
16. John Cassells	Shed/Yard
17. Global Transport	Office/Container/15 Trucks/Trailers
18. Midland Tyres	4 Sheds(Tyre changing bay)
19. PML Windows	1 Shed
20. Quinlan Safes	Container
21. The Side Gate Man	Workshop/2 Containers
22. Christy Ryan	1 Shed/ 2 Containers
23. Aulden Electrical	Container
24. Apollo Language Centre	Container
25. Philip Bedford	Container
26. Brookstar Construction	Container
27. Daktronics	Container
28. DKF Construction	Container
29. DP Building	Container
30. Eagle Air Conditioning	Container
31. Furniture Showrooms	Container
32. DG Heating & Plumbing	Container
33. Gobjila Construction	2 Containers
34. Elk Electrical	2 Containers
35. Kirwan Air Conditioning	Container
36. Martin Kennedy	Container
37. BMC Minimix	Container/3 Mixer Trucks
38. Scully Engineering	2 Containers
39. Philip Loughran Construction	Container
40. Brendan Place	Office
41. Anthony Doherty	Container/Van
42. Irlanda Tours	Office/5 Buses
43. Westcoast Campers	1 Cabin/Container/7 Campers
44. AJ Grabhire	3 Trucks
45. AJ Transport	1 Truck
46. Alan Nolan Transport	2 Trailers
47. Alpha Storage	2 Trailers
48. AOR International	2 Trucks/Trailers
49. Aries Express	1 Van
50. Boyce Coaches	1 Bus
51. Terry Broughan	2 Buses
52. BR Transport	5 Trucks/Trailers
53. BCDL Tours	1 Bus
54. Bury Engineering	1 Truck
55. Barret Coaches	1 Bus
56. Lillian Berzoi	1 Van

57. Michael Coogan Foods	1 Van
58. Paul Clarridge	1 Bus
59. Callanan Coaches	3 Buses
60. CMB Transport	9 Trucks
61. Capital Logistics	5 Trucks/Trailers
62. Liam Costigan	2 Trucks
63. Castlekeeran	4 Trucks/Trailers
64. Cummins Transport	2 Trailers
65. CLF International	2 Trucks/Trailers
66. Camcar Haulage	2 Trucks/Trailers
67. Circuit Transport	5 Trucks/Trailers
68. Carrera Maintenance	1 Truck
69. Cristian C Irimia	1 Truck
70. DTI	2 Trucks
71. Shanog Transport	2 Trucks
72. Drumsnat Haulage	2 Truck/Trailer
73. Dennis Donovan	1 Trailer
74. David Simon	2 Truck/Trailer
75. Dungarvan Transport	4 Trailers
76. DCS Chauffeurs	2 Buses
77. Dragos Pelin	1 Truck
78. Dskorka Transport	1 Trailer
79. Edrida Transport	1 Trailer
80. Envirogreen Polymers Ltd	2 Truck/Trailer
81. A. Ebner	2 Trailers
82. John Elston	1 Van
83. Freight Management	3 Trucks
84. Richard Fox	1 Truck
85. Fynes Logistics	15 Trucks
86. FCD Transport	2 Buses
87. FNJ Haulage Ltd	2 Truck/Trailer
88. Fastline Transport	12 Trucks & Trailers
89. P & D Foley	2 Trailers
90. Barry Fitzgerald	1 Van
91. Foleys Bus Hire Galway	2 Buses
92. Gerry Goggins	2 Truck/Trailer
93. Granby Ltd	1 Van
94. Green Express Couriers	1 Truck
95. Glen Transport	1 Trailer
96. Dennis Grey	1 Van
97. GMA Transport	13 Trucks/Trailers
98. Simon Herbert	1 Coffee Truck
99. John Philips	6 Trucks/Trailers
100. Jenkinson Transport	2 Trailers
101. Jack Restin Displays	4 Trailers
102. J&C Trailer Hire	2 Trailers
103. John Kearns	7 Buses
104. Selena Kavanagh	4 Trucks/Trailers
105. JJ Kavanagh	8 Buses
106. Paddy Kane	8 Trucks
107. Karm Transport	2 Trucks/Trailers
108. Dennis Kinane	1 Trailers
109. Knights of Old	4 Trailers
110. Eugene Kealey	1 Trailer
111. Martin Lawlor	2 Truck/Trailer
112. Martin Lynch	2 Buses
113. Liberty Irish Tours	1 Bus
114. LKW Royal	1 Trailer
115. Lion Trans	4 Trucks/Trailers
116. Leterkeny Coaches	1 Bus

117. LC Warehousing	2 Trucks
118. Cyril McGuinness	2 Trucks/Trailers
119. Mulligan Transport	7 Trailers
120. McGill Travel	2 Buses
121. Declan Mathews	1 Truck
122. Brian McCormack	1 Bus
123. Mangan Haulage	12 Trucks/Trailers
124. McCaffery Coaches	2 Buses
125. Morgan McLernon	15 Trailers
126. Mount Leinster Transport	5 Trailers
127. Brian McCormack Snr	1 Bus
128. David McEntee	2 Truck/Trailer
129. McCann Freight	3 Trucks
130. Gerard McMahon	1 Truck
131. NJR	2 Truck/Trailer
132. Nika Tours	2 Buses
133. Brendan O'Malley	1 Truck
134. Jer O'Halloran	1 Trailer
135. Satin Drive	2 Buses
136. Penrose Transport	3 Trailers
137. Alex Pizelman	1 Van
138. Pinpoint Drains	1 Van
139. Trever Ratcliffe	1 Truck
140. Road Truck Services	1 Truck
141. Roadtrain Ltd	7 Truck/Trailers
142. Roisin Dearg	1 Van
143. Royal Truck Ltd	1 Truck
144. Streamline Coaches	3 Buses
145. Spillane Brother	4 Trailers
146. Pat Smith Haulage	2 Trailers
147. SCS Haulage	3 Trailers
148. Top Oil	2 Trucks
149. Topaz Transport	21 Trucks/Trailers
150. TQ Transport/Hendicks	20 Trailers
151. Traqtrans	1 Trailer
152. Conor Treanor Transport	2 Trailers
153. Trandaree Transport	2 Trailers
154. Tuscola/DHL	40 Trucks
155. TIP Trailers	20 Trailers
156. Val Transport Ltd	4 Trucks/Trailers
157. Tomislav Vukovac	1 Truck
158. Arturs Vasilonokos	1 Truck
159. Willsborough Transport	11 Trucks/Trailers
160. Whitechurch Transport	1 Truck
161. Warlen Logistics	4 Trailers
162. Liam Wright Transport	3 Trucks/Trailers

Appendix B Letter prepared by Stephen Reid Consulting Traffic and Transportation Limited



Stephen Reid Consulting

Traffic and Transportation

21 The Oaks, Ridgewood, Swords, Co Dublin, K67 WK79

te [REDACTED] e-mail: [REDACTED]

web: www.stephenreidconsulting.com

13 July 2023

William Fry LLP
2 Grand Canal Square
Dublin 2
D02 A342

Ref: Projects/Collinstown, Swords Road – Bus Connects

By email

Dear Sirs

**Traffic Consultant Review of NTA Bus Connects Project Proposals, Swords to City Centre and Impact on:
Plot List: 1096(1).2a – Brendan Collins**

1. Background

Stephen Reid Consulting Traffic & Transportation Ltd (SRC) have been retained by our mutual client Mr Brendan Collins to undertake a review of the NTA Bus Connects Core Bus Corridor Scheme - Swords to City Centre, and with reference to the roads and traffic aspects of the Environmental Impact Assessment Report (EIAR) and associated General Arrangement drawings, pertaining to the vicinity of the above referenced plot which can be described as the access junction and entrance to the Collinstown Business Park and adjoining residential dwelling.

The Business Park includes a substantial number of different tenant companies (see appended list of tenants) with a range of operations primarily in haulage, logistics and public transport/coach hire, and facilities including retail diesel pumps (which have in the order of 300 transactions per day), and showers and associated welfare units for commercial drivers.

Therefore, it is paramount that full and unfettered access is maintained (by all modes of transport) at all times (24 hours a day, 365 days a year).

Our client welcomes the general proposals to improve bus, cycling and walking infrastructure but has raised serious concerns with the currently proposed scheme plans in the vicinity of the access junction and the impact on existing operations.

2. Current BusConnects Proposals

The current Bus Connects proposals are illustrated in a series of drawings for this section of the route. General Arrangement Sheet 13 of 37 illustrates this section of the Swords Road. An extract of Sheet 13 of 37 is illustrated in the following Figure 1 and the full Sheet 13 of 37 is appended to this document for your information.

There is a solid red line referenced in the drawing legend as the 'Site Boundary Line' which generally follows the back of footpath/property boundary interface, while a dashed red line extends eastwards into the Collinstown Business Park access (to the rear of the solid red line, encompassing an area over the entire access roadway from the existing back of footpath/property boundary interface to the access gates into the Business Park which



Stephen Reid Consulting

Traffic and Transportation

21 The Oaks, Ridgewood, Swords, Co Dublin, K67 WK79

tel: [REDACTED] e-mail: [REDACTED]

web: www.stephenreidconsulting.com

are approximately 31 metres to the east of the eastern edge of the Swords Road, and after the access to the dwelling on the northernmost side of the access roadway.

The legend on the General Arrangement drawing Sheet 13 of 37 refers to this area encompassed between the solid red line and the dashed red line as a 'Temporary Land Acquisition' and this appears to match the plot list red line on the proposed CPO maps, which are called up as 'Lands Being Temporarily Acquired'.

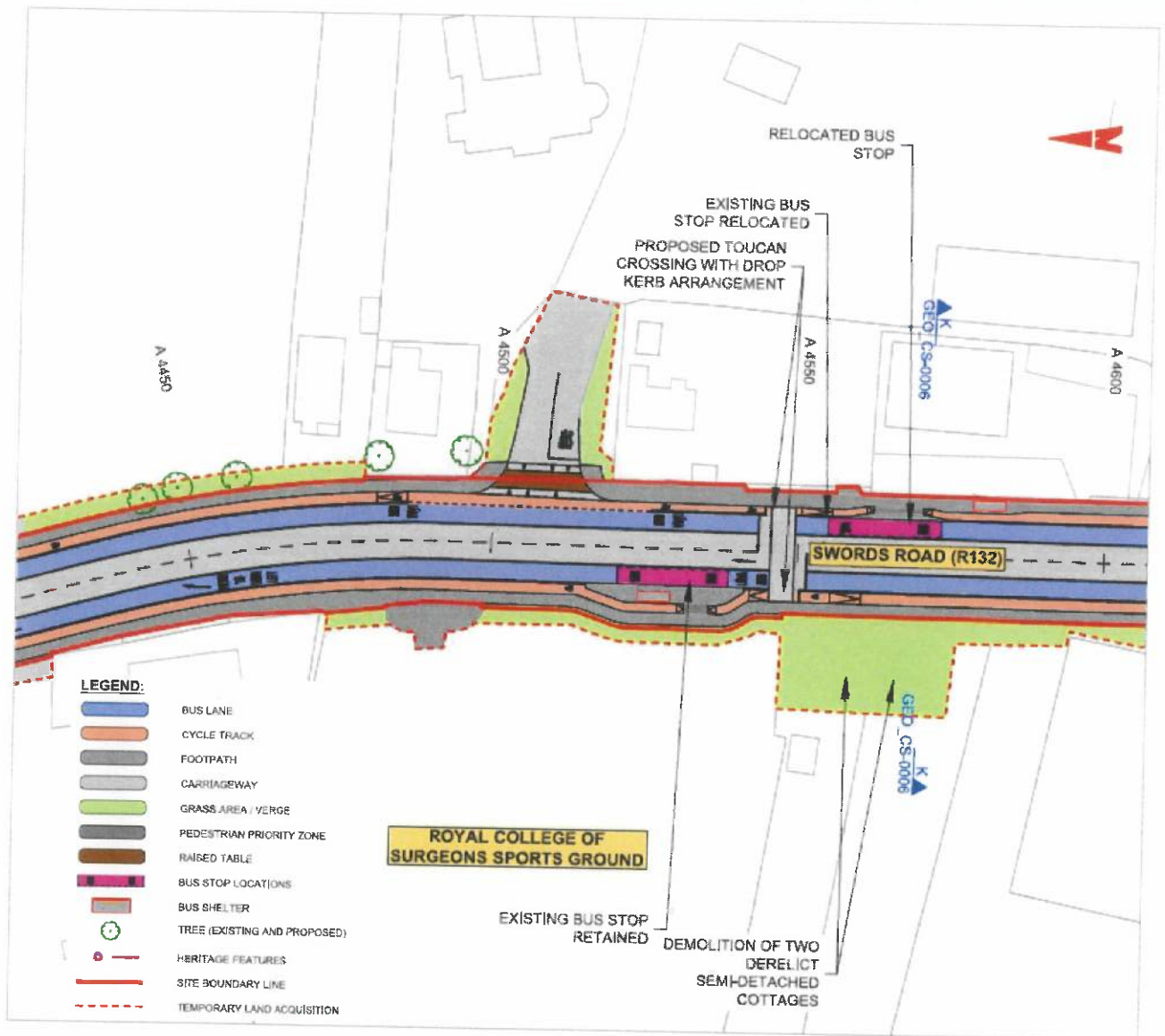


Figure 2: Extract of Sheet 13 of 37 'Swords to City Centre Core Bus Corridor Scheme - General Arrangement' (source: www.busconnects.ie, downloaded July 2023)

From a review of the EIAR documents and associated drawings the reference to lands being "temporarily acquired" is widely utilised within these documents and drawings.

SRC would submit that it is commonly and generally understood that a temporary acquisition for an infrastructure project would mean the requirement for the land by the scheme promoter is temporary in nature



Stephen Reid Consulting

Traffic and Transportation

21 The Oaks, Ridgewood, Swords, Co Dublin, K67 WK79

tel: [REDACTED] -mail: [REDACTED]

web: www.stephenreidconsulting.com

and solely for the purpose of construction works (such as safe working room, site compounds or marshalling areas, or for temporary diversion of utilities, roads or footpaths or in order to build structures such as boundary treatments or retaining walls which require ingress into the lands to the rear of the finished scheme. After these construction works are completed and the area of the construction site is demobilised the land would have to be reinstated to its former condition and returned to the owner of the land.

What is illustrated on the drawing Sheet 13 of 37 is a revised access layout with reduced access width formed by new kerblines and landscaping zones extending from the Swords Road junction to the setback gate.

Currently there are two exiting lanes and a wide entrance lane area to accommodate large HGVs, buses and coaches entering and exiting the access. There is also a dividing barrier between the inbound and outbound lanes to prevent vehicles entering the access from Swords Road and using it to u-turn in the bellmouth area, and some flexipost bollards and associated signage to advise that there is to be no parking in the area between the Swords Road and the setback access gate.

The scheme drawing Sheet 13 of 37 also shows a proposed entry treatment ramp across the reduced width access, with the public footpath crossing point stepped inwards onto the flat zone area of the entry treatment ramp (so that it would be partially behind the site boundary line), and the stopline/Stop road marking text has been located to the rear of the inner toe of the entry treatment ramp.

It is noted that the narrow form of entry treatment ramp proposed on Sheet 13 of 37 would result in HGVs and buses bumping up and down over the ramp, which could have impacts on the drivers and their vehicles but would also result in increased noise impacts on the adjoining residential dwellings.

It is disingenuous for the NTA Bus Connects promoters to claim this is a temporary acquisition when they are proposing wholesale changes to the lands in question and are not reinstating the existing arrangements before returning the lands to the permanent owners.

Apart from the arbitrary nature of the proposal to alter a private development access without any form of adequate liaison and discussion with the affected party, it is noted that the proposed works would clearly impact on the existing operations of the Business Park and access to/from the dwelling (which is Mr Collins home).

As previously stated, the Business Park operates 24 hours per day and therefore any works which result in limitations to access or compromise the turning manoeuvres of large vehicles to safely enter the Business Park access roadway or exit safely to the Swords Road would have significant repercussions for the tenant companies and operators, and in turn would impact on the commercial viability of the Business Park as tenant companies and operators are likely to seek alternative accommodations during the period of works.

From a review of the EIAR documents, it is noted that this section of the Swords Road is identified as Section 2.c (extending southwards from Collinstown Cross to the Northwood Avenue junction, with a total length of 1.62 kilometres).

Clearly a construction start date is subject to the planning and tendering periods, so this is currently unknown. The overall project programme for the Swords to City Centre Coe Bus Corridor is given in the EIAR at Section 5.4 'Construction' in Volume 2 of the EIAR as 36 months (3 Years) and the Section 2.c works are programmed for an 18-month period within that, starting at Q3 in Year 2 and ending at the end of Q4 in Year 3.

Appendix A5.1 – Construction and Environmental Management Plan (CEMP) notes at Section 5.8 Chapter 5 in Volume 2 of the EIAR that in terms of traffic management during the construction programme that if An Bord



Stephen Reid Consulting

Traffic and Transportation

21 The Oaks, Ridgewood, Swords, Co Dublin, K67 WK79

tel: [REDACTED]

e-mail: [REDACTED]

web: www.stephenreidconsulting.com

Pleanála grants approval, temporary traffic management (TTM) design will be prepared by the Contractor in compliance with Chapter 8 of the Traffic Signs Manual (published by DTTAS). There is no reference to any opportunity for liaison/consultation with affected parties at that stage prior to implementation of the TTM by the Contractor.

At Section 5.8.3 of the EIAR, the following is stated *"The roads and streets along the Proposed Scheme, will remain open to general traffic wherever practicable during the Construction Phase. However, lane closures, road closures and diversions will be necessary to facilitate construction."*

Table 5.7 provides a different direction with regard to the relevant section of the scheme Section 2.c. (Swords Road between Collinstown Cross and Northwood Avenue), noting that there would be no road closures but there could be temporary lane closures, closures of bus lane, cycle lane or footpaths, and some use of Stop/Go boards (i.e. shuttle working temporary traffic management).

Therefore, it is considered that the proposed 'temporary land acquisition' and to facilitate the Bus Connects proposals would have a severe impact on the ability of the existing businesses to continue to operate and would also impact on road user safety and customer/staff safety during the period of works.

3. Summary and Conclusions

SRC have carried out this review of the NTA BusConnects proposals for the Swords to City Centre Core Bus Corridor on behalf of Mr Brendan Collins (the owner of the site access and the Collinstown Business Park).

SRC submit that the current Bus Connects proposals on General Arrangement Sheet 13 of 37 are unacceptable as these will have a significant and detrimental impact on the Business Park and the tenant companies by limiting operational and servicing access, with a significant impact on customer and staff safety, inoperable for the existing businesses during the works and impacting on the current arrangements when the proposed works are completed.

SRC would welcome the opportunity to meet with the NTA Bus Connects Project Team to discuss the impact on our client and consider alternative solutions to address his concerns and mitigate possible impacts on the operations of the Collinstown Business Park and the tenants therein.

SRC trust this is all clear but if you have any queries, please do not hesitate to contact the undersigned.

Yours sincerely

Stephen Reid CMILT

Managing Director

Stephen Reid Consulting Traffic and Transportation Limited

Appendix 1 – List of tenant companies and operators at Collinstown Business Park (May 2023)

Appendix 2 - Copy of NTA Bus Connects – Swords to City Centre Core Bus Corridor General Arrangement Sheet 13 of 37

Collinstown Business Park Tenants List as of 26/05/2023

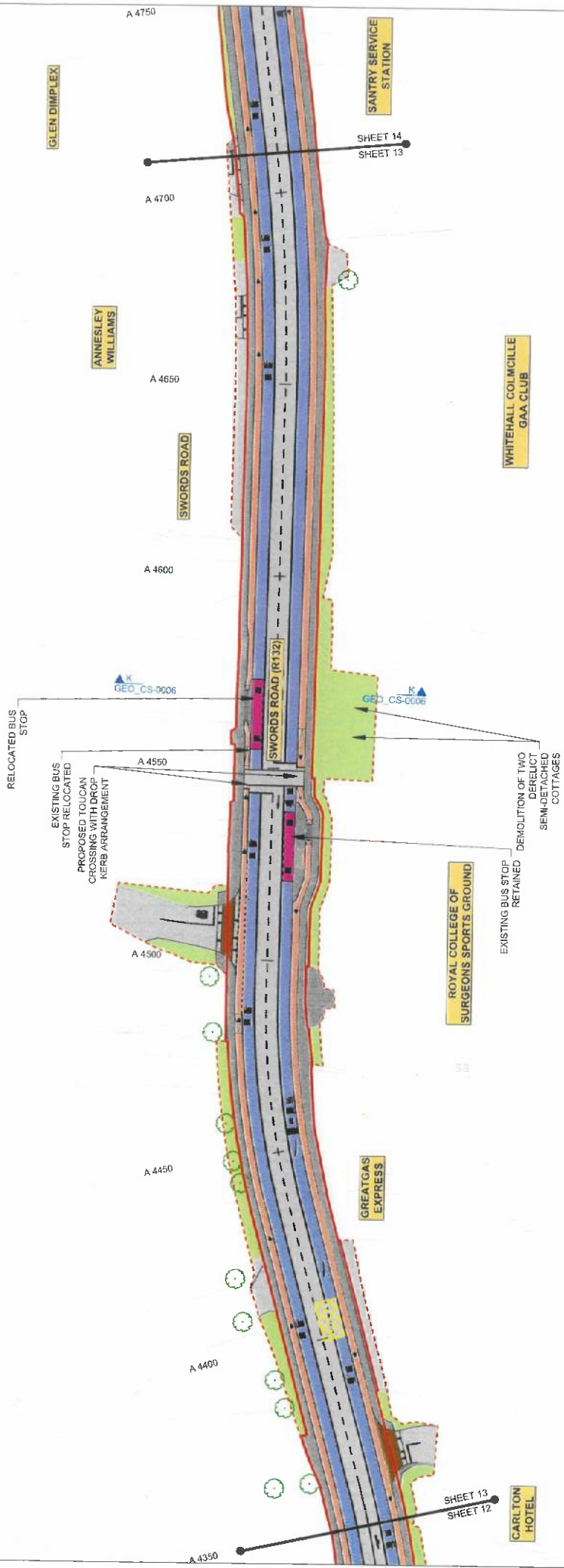
1. Super Mario Couriers - Office/Shed/6 Trucks/Trailers
2. Brendan Collins Coaches - Office/Container/15 Buses
3. Callanan Construction – Storage Yard
4. Dymon Ways - 1 Shed/3 Trucks
5. JS Express – Office/Container/6 Trucks/Trailers
6. Lenmar Developments – Office
7. Liberty Irish Tours – Bus
8. McRent – Office/Shed/6 Campers
9. Northside Upholstery – Office/Showroom/2 Vans
10. New Vintage Transport – Office/Container/25 Trucks/Trailers
11. O’Gradys Coaches – Office/Cabin/23 Buses
12. CPR Transport – Office/Container/Van
13. SFT Transport – Office/Container/29 Trucks/Trailers
14. Voltech Electrical – Office/Container
15. ER Travel – Office/Shed/120 Cars
16. John Cassells – Shed/Yard
17. Global Transport – Office/Container/15 Trucks/Trailers
18. Midland Tyres – 4 Sheds(Tyre changing bay)
19. PML Windows – 1 Shed
20. Quinlan Safes – Container
21. The Side Gate Man – Workshop/2 Containers
22. Christy Ryan – 1 Shed/ 2 Containers
23. Aulden Electrical – Container
24. Apollo Language Centre – Container
25. Philip Bedford – Container
26. Brookstar Construction – Container
27. Daktronics – Container
28. DKF Construction – Container
29. DP Building – Container
30. Eagle Air Conditioning - Container
31. Furniture Showrooms - Container
32. DG Heating & Plumbing – Container
33. Gobjila Construction – 2 Containers
34. Elk Electrical – 2 Containers
35. Kirwan Air Conditioning – Container
36. Martin Kennedy – Container
37. BMC Minimix – Container/3 Mixer Trucks
38. Scully Engineering – 2 Containers
39. Philip Loughran Construction – Container
40. Brendan Place – Office
41. Anthony Doherty – Container/Van

42. Irlanda Tours – Office/5 Buses
43. Westcoast Campers – 1 Cabin/Container/7 Campers
44. AJ Grabhire – 3 Trucks
45. AJ Transport – 1 Truck
46. Alan Nolan Transport – 2 Trailers
47. Alpha Storage – 2 Trailers
48. AOR International – 2 Trucks/Trailers
49. Aries Express – 1 Van
50. Boyce Coaches – 1 Bus
51. Terry Broughan – 2 Buses
52. BR Transport – 5 Trucks/Trailers
53. BCDL Tours – 1 Bus
54. Bury Engineering – 1 Truck
55. Barrett Coaches – 1 Bus
56. Lillian Berzoi – 1 Van
57. Michael Coogan Foods – 1Van
58. Paul Clarridge – 1 Bus
59. Callanan Coaches – 3 Buses
60. CMB Transport – 9 Trucks
61. Capital Logistics – 5 Trucks/Trailers
62. Liam Costigan – 2 Trucks
63. Castlekeeran – 4 Trucks/Trailers
64. Cummins Transport – 2 Trailers
65. CLF International – 2 Trucks/Trailers
66. Camcar Haulage – 2 Trucks/Trailers
67. Circuit Transport – 5 Trucks/Trailers
68. Carrera Maintenance – 1 Truck
69. Cristian C Irimia – 1 Truck
70. DTI – 2 Trucks
71. Shanog Transport – 2 Trucks
72. Drumsnatt Haulage – 2 Truck/Trailer
73. Dennis Donovan – 1 Trailer
74. David Simon – 2 Truck/Trailer
75. Dungarvan Transport – 4 Trailers
76. DCS Chauffeurs – 2 Buses
77. Dragos Pelin – 1 Truck
78. Dskorka Transport – 1 Trailer
79. Edrida Transport - 1 Trailer
80. Envirogreen Polymers Ltd – 2 Truck/Trailer
81. A. Ebner – 2 Trailers
82. John Elston – 1 Van
83. Freight Management – 3 Trucks
84. Richard Fox – 1 Truck
85. Fynes Logistics – 15 Trucks

86. FCD Transport – 2 Buses
87. FNJ Haulage Ltd – 2 Truck/Trailer
88. Fastline Transport – 12 Trucks & Trailers
89. P & D Foley – 2 Trailers
90. Barry Fitzgerald – 1 Van
91. Foleys Bus Hire Galway – 2 Buses
92. Gerry Goggins – 2 Truck/Trailer
93. Granby Ltd – 1 Van
94. Green Express Couriers – 1 Truck
95. Glen Transport – 1 Trailer
96. Dennis Grey – 1 Van
97. GMA Transport – 13 Trucks/Trailers
98. Simon Herbert – 1 Coffee Truck
99. John Philips – 6 Trucks/Trailers
100. Jenkinson Transport – 2 Trailers
101. Jack Restin Displays – 4 Trailers
102. J&C Trailer Hire – 2 Trailers
103. John Kearns – 7 Buses
104. Selena Kavanagh – 4 Trucks/Trailers
105. JJ Kavanagh – 8 Buses
106. Paddy Kane – 8 Trucks
107. Karm Transport – 2 Trucks/Trailers
108. Dennis Kinane – 1 Trailers
109. Knights of Old – 4 Trailers
110. Eugene Kealey – 1 Trailer
111. Martin Lawlor – 2 Truck/Trailer
112. Martin Lynch – 2 Buses
113. Liberty Irish Tours – 1 Bus
114. LKW Royal – 1 Trailer
115. Lion Trans – 4 Trucks/Trailers
116. Letterkenny Coaches – 1 Bus
117. LC Warehousing – 2 Trucks
118. Cyril McGuinness – 2 Trucks/Trailers
119. Mulligan Transport – 7 Trailers
120. McGill Travel – 2 Buses
121. Declan Mathews – 1 Truck
122. Brian McCormack – 1 Bus
123. Mangan Haulage – 12 Trucks/Trailers
124. McCaffery Coaches – 2 Buses
125. Morgan McLernon – 15 Trailers
126. Mount Leinster Transport – 5 Trailers
127. Brian McCormack Snr – 1 Bus
128. David McEntee – 2 Truck/Trailer
129. McCann Freight – 3 Trucks

130. Gerard McMahon – 1 Truck
131. NJR – 2 Truck/Trailer
132. Nika Tours – 2 Buses
133. Brendan O'Malley – 1 Truck
134. Jer O'Halloran – 1 Trailer
135. Satin Drive – 2 Buses
136. Penrose Transport – 3 Trailers
137. Alex Pizelman – 1 Van
138. Pinpoint Drains – 1 Van
139. Trever Ratcliffe – 1 Truck
140. Road Truck Services – 1 Truck
141. Roadtrain Ltd – 7 Truck/Trailers
142. Roisin Dearg – 1 Van
143. Royal Truck Ltd – 1 Truck
144. Streamline Coaches – 3 Buses
145. Spillane Brother – 4 Trailers
146. Pat Smith Haulage – 2 Trailers
147. SCS Haulage – 3 Trailers
148. Top Oil – 2 Trucks
149. Topaz Transport – 21 Trucks/Trailers
150. TQ Transport/Hendicks – 20 Trailers
151. Traqtrans – 1 Trailer
152. Conor Treanor Transport – 2 Trailers
153. Trandaree Transport – 2 Trailers
154. Tuscola/DHL – 40 Trucks
155. TIP Trailers – 20 Trailers
156. Val Transport Ltd – 4 Trucks/Trailers
157. Tomislav Vukovac – 1 Truck
158. Arturs Vasilonokos – 1 Truck
159. Willsborough Transport – 11 Trucks/Trailers
160. Whitechurch Transport – 1 Truck
161. Warlen Logistics – 4 Trailers
162. Liam Wright Transport – 3 Trucks/Trailers

- LEGEND:**
- BUS LANE
 - CYCLE TRACK
 - FOOTPATH
 - LANESIDEWAY
 - GRASS AREA / VENUE
 - PEDESTRIAN PRIORITY ZONE
 - RAISED TABLE
 - BUS STOP LOCATIONS
 - BUS SHELTER
 - HERITAGE FEATURES (THIS, EXISTING AND PROPOSED)
 - SITE BOUNDARY LINE
 - TEMPORARY LAND ACQUISITION



NOTES:

1. ADDITIONAL PROPOSED SCHEME INFORMATION IS AVAILABLE ON THE DRAWING SERIES PROVIDED WITHIN VOLUME III OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIR).
2. WHERE BOUNDARY LINES ARE TO MATCH THE EXISTING UNLESS OTHERWISE DETERMINED IN CONSULTATION WITH THE LANDOWNER.

<p>Project Ireland 2040 Building a better future</p>		<p>NTA National Transport Authority</p>		<p>Jacobs</p>		<p>BUSCONNECTS DUBLIN CORE BUS CORRIDORS INFRASTRUCTURE WORKS</p>		<p>Programme Title CORE BUS CORRIDORS INFRASTRUCTURE WORKS</p>		<p>Drawing Title SWORDS TO CITY CENTRE CORE BUS CORRIDOR SCHEME GENERAL ARRANGEMENT</p>		<p>Drawing File Name BCIDB-JAC-GEO_SA0002_XX_00-DP-CR-0001.dwg</p>		<p>Scale 1:500 @ A1 1:1000 @ A3</p>		<p>Drawn JAC</p>		<p>Checked JAC</p>		<p>Approved JAC</p>		<p>Issue A</p>		<p>Sheet M01</p>	
<p>Author JAC</p>		<p>Date 06/04/2023</p>		<p>Drawn JAC</p>		<p>Issue HOS</p>		<p>Project Code BCIDB</p>		<p>Project Name SWORDS TO CITY CENTRE CORE BUS CORRIDOR SCHEME</p>		<p>Project Code BCIDB-JAC-GEO_SA0002_XX_00-DP-CR-0001.dwg</p>		<p>Project Name SWORDS TO CITY CENTRE CORE BUS CORRIDOR SCHEME</p>		<p>Project Code BCIDB-JAC-GEO_SA0002_XX_00-DP-CR-0001.dwg</p>		<p>Project Name SWORDS TO CITY CENTRE CORE BUS CORRIDOR SCHEME</p>		<p>Project Code BCIDB-JAC-GEO_SA0002_XX_00-DP-CR-0001.dwg</p>		<p>Project Name SWORDS TO CITY CENTRE CORE BUS CORRIDOR SCHEME</p>		<p>Project Code BCIDB-JAC-GEO_SA0002_XX_00-DP-CR-0001.dwg</p>	

DO NOT SCALE USE FIGURED DIMENSIONS ONLY