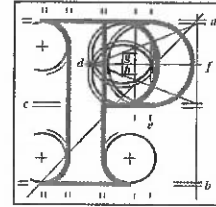


Our Case Number: ABP-317660-23

Your Reference: Tesco Ireland



**An
Bord
Pleanála**

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

Date: 22 September 2023

Re: Busconnects Kimmage to city centre core bus corridor scheme
Kimmage, Dublin

Dear Sir / Madam,


An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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

If you have any queries in the mean time, 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,



Eirhear Reilly
Executive Officer
Direct Line: 01-8737184

HA02

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 Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Planning Consultants

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

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

Email: admin@rmla.ie
Date: 22nd September 2023

Dear Sir/Madam,

Re: BusConnects Kimmage to City Centre Core Bus Corridor Scheme

An Bord Pleanála Ref. No. 317660

Introduction

We, RMLA Limited, acting on behalf of our client, Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, County Dublin to prepare this submission in relation to the lodgement of the BusConnects Kimmage to City Centre Core Bus Corridor Scheme by the National Transport Authority (hereafter 'NTA').

The payment of €50, being the appropriate fee for making a submission, has been made online. Please note all correspondence in relation to this submission should be sent to the Agents, RMLA Limited, 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 engage with the NTA and ABP in respect of the preparation of the BusConnects Scheme.

Tesco Ireland Limited (hereafter 'Tesco') welcomes the proposed investment in public transport, active travel, and the urban environment of Dublin. It is considered that the proposed BusConnects Scheme will greatly improve the way in which Dublin City and the surrounding area functions from an economic, social, and environmental perspective.

With regards to the Kimmage to City Centre route, Tesco operates two Express stores along this route on Kimmage Road Lower and Leonards Corner.

Kimmage Road Lower

Loading Bay

During the Preferred Route Option stage of the public consultation, our client requested that a portion of the parking proposed outside 302-312 Kimmage Road Lower be designated as a loading bay. It appears from the scheme submitted to ABP (see Figure 1); there is still no space specifically designation for loading bay facilities. Given the volume of commercial premises in the vicinity, it is

requested that a dedicated loading bay be provided at this location. A number of premises at this location require on-street space to take deliveries, as such, it is imperative that space is designated for same to ensure space is available when required, at appropriate times.

It is important that a loading bay space is provided to the front of these premises as locating loading bays at a considerable distance from our store and many other commercial premises who are reliant on regular deliveries, typically receiving one or two per day, can lead to significant pedestrian safety issues whereby delivery vehicles/handlers come into conflict with pedestrians potentially leading to serious health and safety risks. Additionally, further obstacles such as on street planting, outdoor seating, and cycle parking etc, may be encountered resulting in further safety concerns for the public.

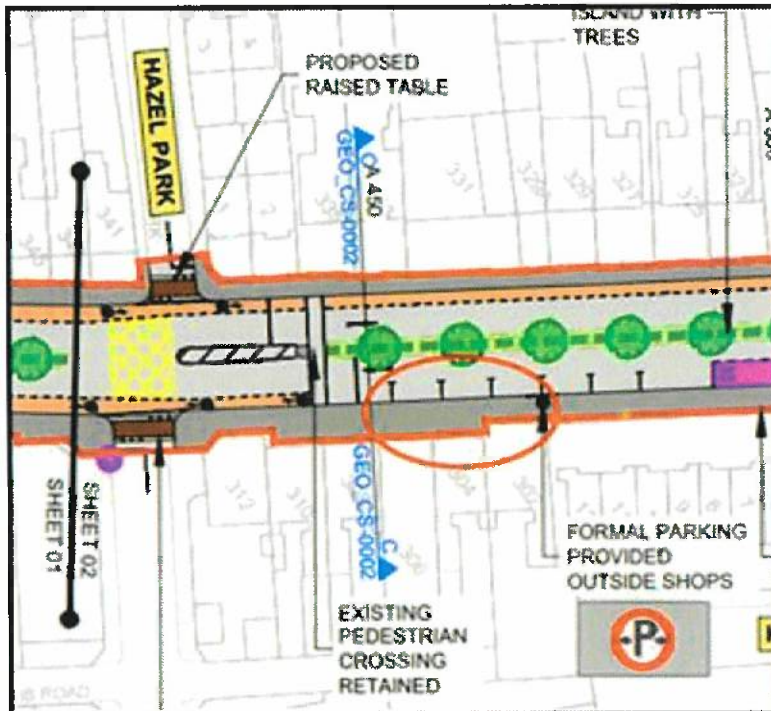


Figure 1: Extract from General Arrangement Drawing - Kimmage Road Lower. Red circle indicating approx. location of required loading bay area.

Bus Gates

Furthermore, there are bus gates shown in both directions at Kimmage Road Lower / Ravensdale Park, Bus Gate No.1 and Harold's Cross Park, Bus Gate No. 2A (see Figure 2). Bus Gate No.1 is shown to be in operation between 06:00-10:00 and 16:00-20:00, and Bus Gate 2A is 24 hours.

The Tesco Kimmage Express store is located between these two bus gates. Delivery vehicles currently service the store travelling in a north to south direction along R817 (City Centre to M50). Deliveries to the store are currently part of a wider consolidated delivery to multiple stores, in order to minimise vehicle kilometres travelled within the city environment.

The introduction of the Bus Gates means the current approach for deliveries to Tesco Kimmage Express store is no longer possible. Instead, HGV deliveries are required to either undertake U-turns on busy urban streets and/or travel across a series of quieter residential streets over longer distances to access and service the store.

To avoid these unsuitable access requirements, it is respectfully requested that Bus Gates are implemented with consideration given to the servicing needs of Tesco Kimmage Express Store and other commercial premises along the route. This could be achieved by reducing the hours of operation of 24-hour Bus Gates to facilitate a delivery window period or permitting HGVs to pass through Bus Gates.

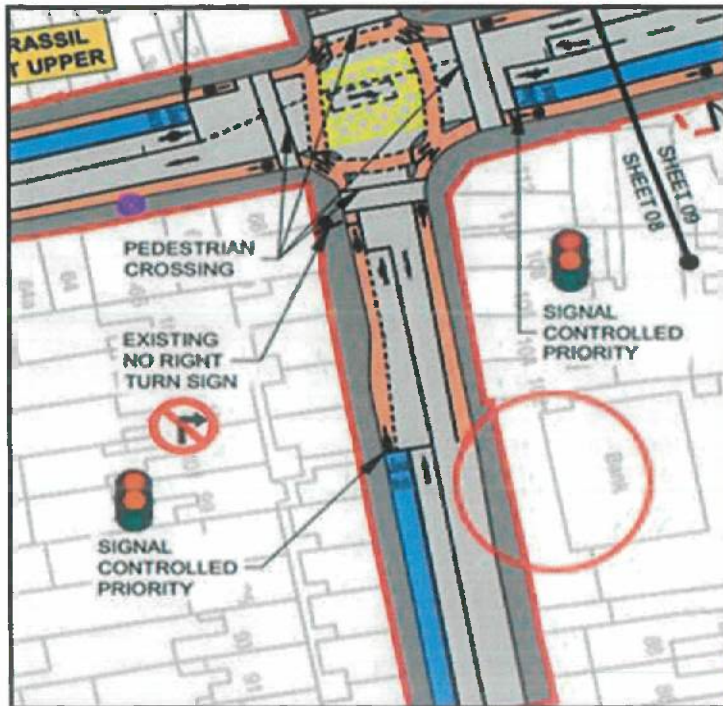


Figure 3: Extract from General Arrangement Drawing - Leonards Corner. Approx. existing loading bay location indicated by red circle.

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, however, we would ask that the importance of daily servicing and accessibility be recognised as part of the Kimmage to Dublin City Centre Core Bus Corridor Scheme.

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

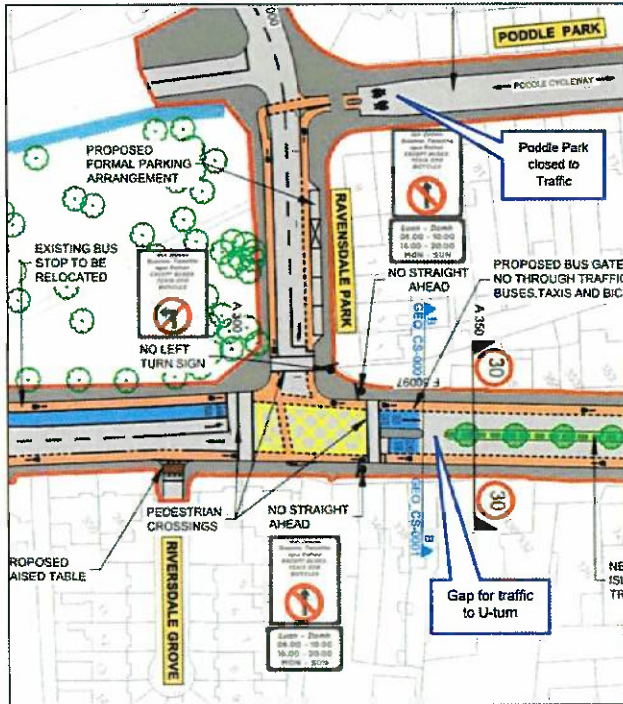


Figure 3-2a: Proposed Bus Gate No.1 at junction of Kimmage Road Lower and Ravensdale Park

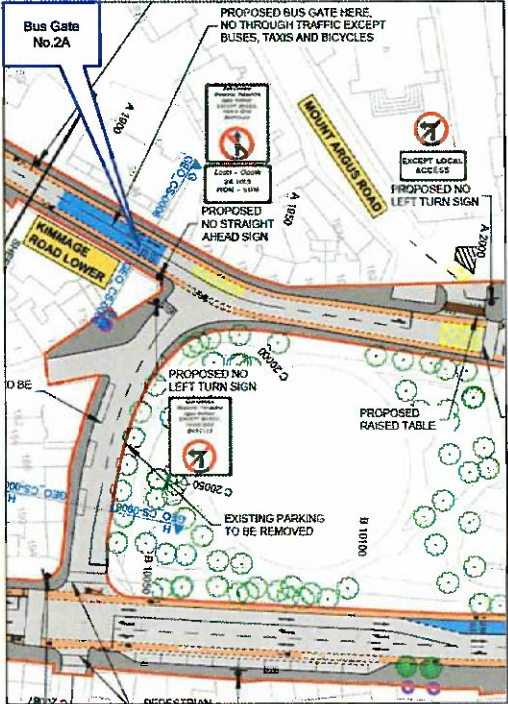


Figure 3-2b: Proposed Bus Gate No.2A at southwest corner of Harold's Cross Park



Figure 3-3: Traffic Management Measures for Kimmage Core Bus Corridor Southern Bus Gate

Figure 2: Extracts from Preliminary Design Report regarding Bus Gates

Leonards Corner

From a review of the proposed scheme as submitted to ABP (see Figure 3), it is unclear if the existing loading bay outside the Tesco Express store is to be retained as part of the scheme. As such, it is respectfully requested that the existing dedicated loading bay be maintained at this location to facilitate the necessary daily deliveries and servicing of the retail unit and to ensure both the health and safety of pedestrians and efficient operation of the stores.