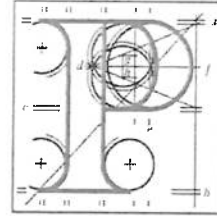


**Our Case Number:** ABP-317780-23  
**Planning Authority Reference Number:**  
**Your Reference:** Mandabard Holdings Ltd.



**An  
Bord  
Pleanála**

Sudway & Company Limited  
Riversdale House  
Riversdale View  
Ballyboden Road  
Rathfarnham  
Dublin 14

**Date:** 16 October 2023

**Re:** Bray to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023  
Bray to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your letter of objection in relation to the above mentioned compulsory purchase order.


In respect of same, please note that in circumstances where:

- (i) no objections are received by the Board within the period provided for making objections, or
  - (ii) all objections made are subsequently withdrawn, or
  - (iii) all objections made relate exclusively to matters which can be dealt with by a property arbitrator
- the Board will inform the local authority as appropriate and, in such circumstances, the local authority can itself confirm the order with or without modification or refuse to confirm the order in accordance with the provisions of section 216 of the Planning and Development Act, 2000, as amended.

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 on this matter in due course.

If you have any queries in the meantime please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie) Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

CH02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

# SUDWAY & COMPANY LIMITED CHARTERED SURVEYORS

N. SUDWAY, MRICS, MSCSI, FCI Arb. M.MII

Riversdale House  
Riversdale View  
Ballyboden Road  
Rathfarnham  
Dublin, 14

Tel. No. 01-4061512

Fax No. 01-4061517

<b>AN BORD PLEANÁLA</b>	
LDG-	067444-23
ABP-	317730-23
09 OCT 2023	
Fee: €	Type:
Time: 15:27	By: Hand

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

6<sup>th</sup> October, 2023

Re: Bray to city Centre Core Bus Corridor Scheme  
Compulsory Purchase Order 2023  
Mandabard Holdings Ltd. Ref No. 1039.

Dear Sir/Madam,

With regards to the above matter, I can confirm that I have been instructed by the above named land owner to act on their behalf in relation to the matter. Following on from the issuance of the Compulsory Purchase Order on the 10<sup>th</sup> August 2023, I wrote to the NTA, on the 5<sup>th</sup> September, requesting more details of their proposal as it would affect my Clients property. A copy of my letter and the automatic reply from the NTA is attached in appendix 1. As of the date of this letter there has been no further reply or correspondence from the NTA. It is in our view not acceptable to merely direct us to a web site. The NTA are the promoters and designers of the scheme and should be able to provide detailed plans including section and profiles and levels of the new carriage way and details of the reinstatement works to be carried out to the car park at the front of the premises

We had requested that the temporary and permanent takes be marked out on site so that the full extent and impact on my Clients property and on their Tenants can be assessed. This has not been done. The CPO map which was issued as part of the Order and the maps included in the documents submitted as part of the Statutory process, (Appendix 2) are of such a small scale and of such poor quality as to be almost useless in trying to identify what lands are being acquired and what it is proposed to construct.

Having viewed the documents we were directed to in the email from the NTA it is clear that no specific thought has been given to my Clients property or the effect of the proposed scheme either during the works or when the works are completed. Section 5.53.2 of Volume 2 dealing with Parking and Access states that "Local access arrangements will be made on a case by case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with residents and business owners prior to the construction starting in the area." (Appendix 3). This actually provides no information for my Client or her tenants or the Bord and it is our view that this detail should be provided now so that the Bord can make an informed decision and that my Client might be able to make an informed decision in relation to these submissions which is clearly not possible as there is no plan being put forward by the Acquiring Authority. It seems bizarre to suggest that vital information like this will only be discussed after the NTA have a compulsory purchase order, when my Client will have no real input and can be ignored by the NTA as they will have ability to take possession of the lands and proceed under the Order to carry out whatever works they wish.

There is also no indication as to how long these works will take, this information is vital from my Clients perspective.

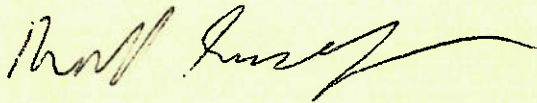
Given the total lack of design being put forward by the applicant it is our view that it would be premature for the Bord to make a decision in favour of the scheme as currently being presented. It is unlikely that Planning permission for any other form of development would be granted on the information currently being provide. To confirm the order as presently presented would constitute a infringement of my Clients constitutional right to the quiet enjoyment of their property.

In the event that the Bord decides to hold an oral hearing into the matter my Client reserves the right to be represented and to cross examine any witnesses and to make further submissions should other information become available. We would also request that if the NTA provide the Bord with any information which would be relevant to my Clients property or which respond to the contents of this submission

or my previous correspondence to them, that we should be copied the same so that we can consider the contents and address this information in a timely manner.

We would also request that the Bord order that the NTA should reimburse the land owners costs in dealing with this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Niall Sudway', with a long, sweeping horizontal line extending to the right.

Niall Sudway MRICS, MSCSI, FCIARbM.MII

Mr Aidan Gallagher,  
Head of Bus Connects Dublin Infrastructure ,  
National Transport Authority.

5<sup>th</sup> September, 2023

Re: Bray to City Centre Core Bus Corridore Scheme  
Manabard Holdings Ref: 1039

Dear Mr Gallagher,

With regards to the above matter and the Compulsory purchase order served on my Client dated the 10<sup>th</sup> August 2023. In order to assist me in advising my Client can you arrange to have the permanent and temporary acquisition Lines marked out on the ground so that the full impact can be considered , especially the impact on the car parking which is essential for her Tenants and their businesses. I would also appreciate it if you could provide us with detailed design drawings of your proposed development at my Clients property especially detailing what the final access and car parking will look like. You might also confirm how access is to be maintained during the works for customers, staff and deliveries.

I look forward to receiving the requested information as soon as possible so that it can be considered before the closing date for submission to the Bord.

Yours sincerely,

Niall Sudway MRICS, MSCSI, FCIARb M.MII

## Niall Sudway

---

**From:** BusConnects Property <property@busconnects.ie>  
**Sent:** Tuesday 5 September 2023 11:24  
**To:** Niall Sudway  
**Subject:** Automatic reply: Bray Bus Corridore

Thank you for contacting the National Transport Authority.

Your enquiry has been received and will be dealt with as soon as possible.

We aim to respond to all enquiries within 15 working days.

For information on BusConnects visit our website [www.busconnects.ie](http://www.busconnects.ie)

If your query is related to the Statutory Planning Application for the Bray to City Centre Core Bus Corridor Scheme visit the scheme website [www.brayscheme.ie](http://www.brayscheme.ie)

If your query is related to the Statutory Planning Application for the Ringsend to City Centre Core Bus Corridor Scheme visit the scheme website [www.ringsendscheme.ie](http://www.ringsendscheme.ie)

If your query is related to the Statutory Planning Application for the Kimmage to City Centre Core Bus Corridor Scheme visit the scheme website [www.kimmagescheme.ie](http://www.kimmagescheme.ie)

If your query is related to the Statutory Planning Application for the Swords to City Centre Core Bus Corridor Scheme visit the scheme website [www.swordsscheme.ie](http://www.swordsscheme.ie)

If your query is related to the Statutory Planning Application for the Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme visit the scheme website [www.tallaghtclondalkinscheme.ie](http://www.tallaghtclondalkinscheme.ie)

If your query is related to the Statutory Planning Application for the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme visit the scheme website [www.templeoguerathfarnhamscheme.ie](http://www.templeoguerathfarnhamscheme.ie)

If your query is related to the Statutory Planning Application for the Lucan to City Centre Core Bus Corridor Scheme visit the scheme website [www.lucanscheme.ie](http://www.lucanscheme.ie)

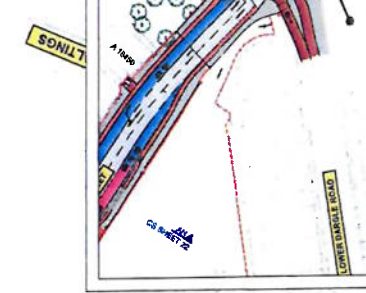
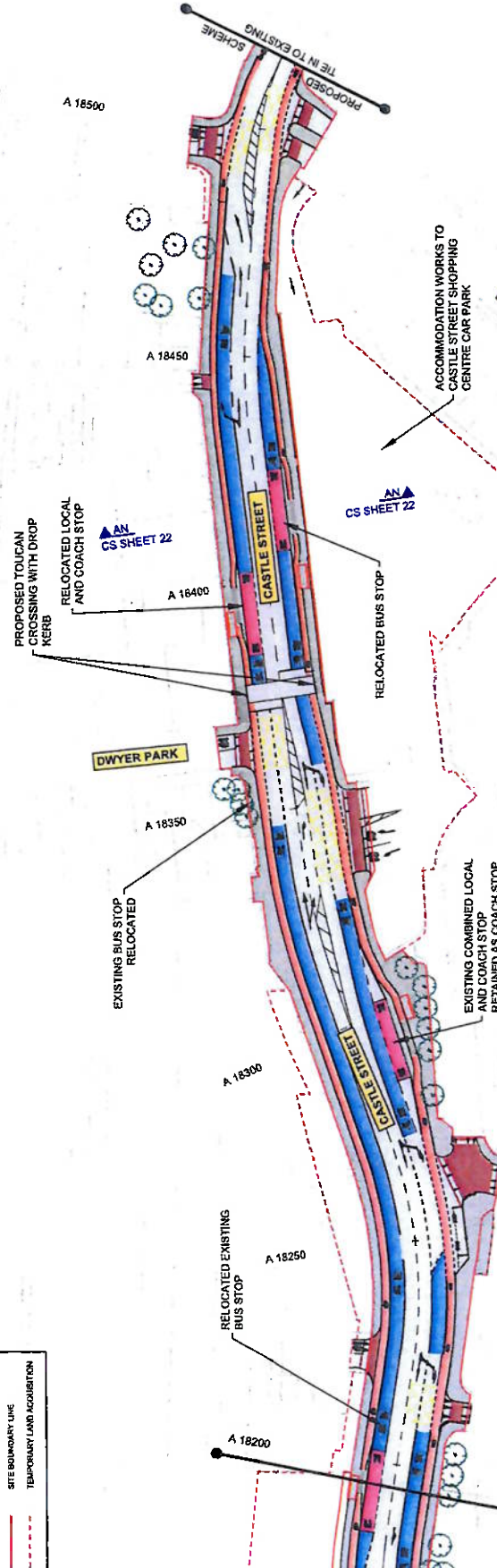
If your query is related to the Statutory Planning Application for the Ballymun/Finglas to City Centre Core Bus Corridor Scheme visit the scheme website [www.ballymunfinglasscheme.ie](http://www.ballymunfinglasscheme.ie)





RAVENSWELL ROAD

A 18500



TIE-IN TO FUTURE WICKLOW COUNTY COUNCIL BRAY BRIDGE SCHEME BY OTHERS



**LEGEND:**

	BUS LANE
	CYCLE TRACK
	FOOTPATH
	CARRAGEWAY
	GRASS AREA / VERGE
	PEDESTRIAN PRIORITY ZONE
	RAISED TABLE
	BUS STOP LOCATIONS
	BUS SHELTER
	TYPE (EXISTING AND PROPOSED)
	HERITAGE FEATURES
	SITE BOUNDARY LINE
	TEMPORARY LAND ACQUISITION

**NOTES:**

1. ALL INFORMATION PROVIDED HEREIN IS AVAILABLE ON THE DRAWING SERIES PROVIDED WITHIN VOLUME B OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIR).
2. BOUNDARY WALLS ARE TO MATCH THE EXISTING UNLESS OTHERWISE DETERMINED IN CONSULTATION WITH THE LANDOWNER.

**NOTES:**

1. The information provided herein is for information only and is not intended to be used for any other purpose.
2. The information provided herein is for information only and is not intended to be used for any other purpose.
3. The information provided herein is for information only and is not intended to be used for any other purpose.
4. The information provided herein is for information only and is not intended to be used for any other purpose.



Rev	Date	Chg	Chg of	Author	Description
MAT	08/05/2023	01	EC	JAE	ISSUE FOR PHASE 4 PLANNING

**NTA**  
National Transport Authority  
National Transport Authority  
Date: 08/05/2023  
Scale: 1:500 @ A1  
1:1000 @ A3  
Project: BCDP  
Drawn: JAC  
Checked: EC  
Approved: JAE  
GMS Code: [blank]

**Jacobs**  
Engineering Design  
Programme File: BUSCONNECTS DUBLIN  
CORE BUS CORRIDORS INFRASTRUCTURE WORKS  
Drawing Title: BRAY TO CITY CENTRE CORE BUS CORRIDORS SCHEME  
GENERAL ARRANGEMENT PLAN  
Drawing Number: 52 of 54  
Scale: A  
Rev: M01

DO NOT SCALE USE FIGURED DIMENSIONS ONLY





## 5.5.3 Road and Street Upgrades

### 5.5.3.1 General

The Proposed Scheme will be constructed in a manner which will minimise, as much as practicable, any disturbance to residents, businesses and road users. Road and street upgrade works will be completed in a staged manner, as described in Section 5.8.3, whereby traffic of all modes will be managed to ensure construction can continue while ensuring the safety of all road users, and personnel, and maintaining flow of all modes of traffic wherever practicable.

### 5.5.3.2 Parking and Access

When roads and streets are being upgraded, there will be some temporary disruption/allerations to on-street and off-street parking provision, and access to premises in certain locations along the Proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with residents and business owners prior to construction starting in the area. The duration of the works will vary from property to property, but access and egress will be maintained at all times. The location of temporary land acquisition, proposed gates, and the relocation of existing gates are shown in the Fencing and Boundary Treatment drawings (BCIDB-JAC-SPW\_BW-0013\_XX\_00-DR-CR-9001) in Volume 3 of this EiAR.

Access will be maintained for emergency vehicles along the Proposed Scheme, throughout the Construction Phase.

### 5.5.3.3 Earthworks

Topsoil and subsoil will be excavated as part of the Proposed Scheme, for foundations, bus stop shelters, signs, public lights, traffic signal poles, tree pits, etc. This topsoil and subsoil may be temporarily stored at the Construction Compound for reuse where practicable, in line with the principles of circular economy. The Proposed Scheme will aim to minimise the amount of materials brought onto the Proposed Scheme in so far as practicable. The acceptability of earthworks material for reuse will be determined, by testing and analysis, to determine if materials meet the specific engineering standards for their proposed end-use.

All earthworks will be managed having regard to the Guidelines for the Management of Waste from National Road Construction Projects (TII 2017), and Number 10 of 1996 – Waste Management Act, 1996, as amended (hereafter referred to as the Waste Management Act. The management of materials is discussed in Chapter 18 (Waste & Resources) of this EiAR. The overall estimated quantities of demolition, excavation, and reuse materials for the Proposed Scheme are outlined in Table 19.10 in Chapter 19 (Material Assets) of this EiAR.

### 5.5.3.4 Cellars

Excavations within the City Centre will be minimal, thereby reducing the risk of interference with existing cellars along the Proposed Scheme. At certain locations, cellars and coal holes extend outwards from buildings into adjoining footpaths or streets. Cellars, coal holes and light wells have been identified at Section 1a. However, it is not anticipated that proposed works will impact directly on any cellars.

### 5.5.3.5 Drainage

Adjustment or upgrade works will be required to service chambers and manholes, gullies, etc. Access manholes located in the footways will be lowered or raised to match the proposed carriageway levels, where the carriageway will be widened into the existing footways.

Specific controls and mitigation measures will be put in place to manage runoff and minimise pollution to receiving water bodies during the Construction Phase of the Proposed Scheme. Further information with regards to drainage, and drainage design is included in Chapter 4 (Proposed Scheme Description), Chapter 13 (Water), Chapter 19 (Material Assets) and the Surface Water Management Plan (SWMP) in Appendix A5.1 CEMP in Volume 4 of this EiAR.