



An  
Bord  
Pleanála

# Inspector's Report

## ABP-313892-22

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<b>Development</b>	BusConnects Connects Blanchardstown to City Centre Core Bus Corridor Scheme
<b>Location</b>	Blanchardstown to Dublin City Centre
<b>Planning Authority</b>	Dublin City Council & Fingal County Council
<b>Applicant(s)</b>	National Transport Authority
<b>Type of Application</b>	Application under Section 51 (2) of the Roads Act 1993 as amended
<b>Observer(s)</b>	Refer to Appendix I
<b>Prescribed Bodies</b>	Refer to Appendix II
<b>Date of Site Inspection</b>	28 <sup>th</sup> January 2024, 18 <sup>th</sup> October 2023, 13 <sup>th</sup> December 2023, 19 <sup>th</sup> December 2023
<b>Inspector</b>	Sarah Lynch

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## 1.0 Introduction

- 1.1. The National Transport Authority has submitted an application to the Board under Section 51 (2) of the Roads Act 1993 as amended. This report sets out an assessment of the application submitted by the National Transport Authority for the development of a sustainable transport scheme which provides for both cycle and bus priority measures over a distance of 10.9km from Blanchardstown to the City Centre.
- 1.2. The proposed scheme is 1 of 12 no. bus corridor schemes within the Dublin area under the Bus Connects programme and is accompanied by a Compulsory Purchase Order reference ABP 313961-22. The objectives of the schemes are to:
- Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality.
  - Enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable.
  - Support the delivery of an efficient, low carbon and climate resilient public transport service, supporting the achievement of Ireland’s emission reduction targets.
  - Enable compact growth, regeneration opportunities and more effective use of land in Dublin.
  - Improve accessibility to jobs, education, and other social and economic opportunities; and
  - Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.
- 1.3. Pre-application discussions were undertaken by the applicant with the Board in accordance with Section 51A of the Roads Act 1993 as amended, which provides for consultations with An Bord Pleanála before making an application under Section 51. Four Consultation Meetings were held on 21<sup>st</sup> April, 2021, 20<sup>th</sup> May, 2021, 10<sup>th</sup> June, 2021, and 29<sup>th</sup> June, 2021. A determination in relation to whether the project is strategic infrastructure or not is not required under this Act. The pre application discussions were closed on the 12<sup>th</sup> August 2021.

- 1.4. The Application is accompanied by an EIAR and a NIS. No Oral Hearing was held in relation to the application as per the Boards Direction dated 18<sup>th</sup> May 2023.

## 2.0 Site Location and Development Description

- 2.1. The proposed scheme submitted under this application will comprise the construction of the Blanchardstown to City Centre Bus Corridor will be approximately 10.9km and will commence at Junction 3 (Blanchardstown / Mulhuddart) southbound off-slip from the N3. The Proposed Scheme proceeds along the R121 Blanchardstown Road South into the Blanchardstown Shopping Centre.
- 2.2. From a new terminus to the north-west of Blanchardstown Shopping Centre the Proposed Scheme is routed onto the N3 Navan Road via the Snugborough Road junction and will follow the N3 and Navan Road as far as the junction with the Old Cabra Road. From here, the Proposed Scheme will be routed along Old Cabra Road, Prussia Street, Manor Street and Stoneybatter to the junction with King Street North.
- 2.3. The Proposed Scheme will proceed via Blackhall Place as far as the junction with Ellis Quay, where it will join the prevailing traffic management regime on the North Quays. At the Stoneybatter / Brunswick Street North junction, cyclists proceed along Brunswick Street North, George's Lane and Queen Street as far as Ellis Quay/Arran Quay.

## 3.0 Proposed Development

- 3.1. The proposed development will provide bus priority measures and segregated cycle infrastructure as follows:

### Key Changes

- The number of pedestrian signal crossings will increase by 62% from 77 to 125 as a result of the Proposed Scheme;
- The proportion of segregated cycle facilities will increase from 9% on the existing corridor to 78% on the Proposed Scheme; and
- The proportion of the route having bus priority measures will increase from 25% on the existing corridor to 97% on the Proposed Scheme.

- 3.2. The Proposed Scheme is described in the following five geographical sections as follows:
- Section 1: N3 Blanchardstown Junction to Snugborough Road;
  - Section 2: Snugborough Road to N3 / M50 Junction;
  - Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction;
  - Section 4: Navan Road / Ashtown Road junction to Navan Road / Old Cabra Road Junction; and
  - Section 5: Navan Road / Old Cabra Road junction to Ellis Quay.

3.3. Section 1

- 3.4. The Proposed Scheme will commence at Junction 3 (Blanchardstown / Mulhuddart) eastbound off-slip from the N3. It is proposed to alter the existing off-slip road from the N3, from two general traffic lanes to one general traffic lane and one bus lane. At the junction of Blanchardstown Road North / Old Navan Road, it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge.
- 3.5. In the vicinity of the N3 overbridge, cycle tracks will be relocated alongside footpaths, which cross adjacent to pedestrian crossings at slip-roads to avoid conflict with vehicular traffic. After crossing the N3 overbridge, the Proposed Scheme will provide a westbound bus lane alongside a general traffic lane along Blanchardstown Road South towards the Blanchardstown Shopping Centre via the Blakestown Way junction. Two eastbound general traffic lanes will also be provided along Blanchardstown Road South.
- 3.6. A cycle track will be provided along each side of Blanchardstown Road South. A new retaining wall will be required between the cycle track / footpath and the shopping centre, extending from the westbound bus stop to the N3 off slip junction and further south towards the Crowne Plaza hotel.
- 3.7. The existing small retaining wall and railing between Whitestown Grove and Blanchardstown Road South will be replaced due to a reduction in footpath levels. The new wall and railing will match existing.

- 3.8. A new bus layover 'layby' and driver welfare facility will be located north of the shopping centre on Blanchardstown Road South. A new access, in the form of a signalised junction, will be provided from Blanchardstown Road South into the northern car park at Blanchardstown Shopping Centre. The Blanchardstown Road South / Blakestown Way junction will be converted from a roundabout to a signal-controlled junction. The proposals for the road linking the Blanchardstown Road South / Blakestown Way junction to the western junction of the Bus Interchange include a bus lane and general traffic lane in each direction, with an additional left turn filter lane into the shopping centre.
- 3.9. A single cycle track along the eastern side of this road becomes a two-way cycle track on the approach to the shopping centre. The area adjacent to the western junction of the Bus Interchange will facilitate 35 bicycle stands.
- 3.10. The existing roundabouts in the vicinity of the Blanchardstown Shopping Centre will be converted to signalised junctions. Within the Blanchardstown Shopping Centre site, the existing bus laydown will be upgraded to a more formal Bus Interchange with improved passenger waiting facilities. The new Bus Interchange will include six bays for boarding / alighting and an additional seven alighting bays for buses.
- 3.11. The existing roundabout junction adjacent to the Liberty Insurance Building on the L3020 will be modified to a fully signalised crossroads junction, allowing for bus lanes in both directions each side of this junction. The road between the existing junction and the tie-in with the Snugborough Interchange Upgrade scheme will be widened to accommodate improved cycling, pedestrian and bus stop facilities.
- 3.12. A new bus layby (for inter-urban buses) will be provided on the westbound carriageway on the L3020, which will require a short section of retaining wall to be constructed to the rear of the proposed cycle track at this location. Following this Section, it is intended to route the bus lane through the Snugborough Road junction.

## Section 2

- 3.13. This Section of the Proposed Scheme will commence at the tie-in with the Snugborough Junction Upgrade scheme on the N3 citybound slip-road. A bus lane will be provided along the N3 Snugborough Road junction onslip and off-slip ramps. The Proposed Scheme will provide bus lanes on the N3 corridor in both directions which

will require the widening of the BR01 River Tolka Bridge beneath the N3 off-slip and also BR02 Mill Road Bridge.

- 3.14. On the N3 inbound carriageway, the Proposed Scheme will relocate the overhead variable messaging sign, modify an existing overhead sign gantry, provide a new overhead sign gantry and remove an existing overhead sign gantry.
- 3.15. Additional inbound and outbound bus stops will be provided on the N3 with pedestrian access to and from Mill Road. Access from Mill Road to the new bus stops will be via pedestrian ramps and steps.
- 3.16. Existing noise barriers will be relocated along the outbound carriageway at the back of the verge. The speed limit will be 60km/h for the inbound and outbound bus lane of the N3 carriageway section. The inbound bus lane will be directed onto the Connolly Hospital off-slip road and onto the N3 Navan Road. The Proposed Scheme will provide a bus lane in both the eastbound and westbound directions on the gyratory over the M50 (Junction 6).

### Section 3

- 3.17. It is intended to construct a new section of inbound bus lane between the eastern side of the N3/M50 gyratory and the Auburn Avenue junction. New bus stops will be provided immediately to the east of Auburn Avenue junction with the R147 Navan Road, along both the inbound and outbound carriageways. A short retaining wall will be provided to the rear of the outbound bus stop.
- 3.18. A new bus lane will operate along the existing inner lane of the inbound and outbound R147 Navan Road. The bus lane will terminate on the inbound carriageway between Morgan Place and the Navan Parkway off-slip junction which will allow left turning vehicles to enter the nearside lane to leave the main carriageway. At the Navan Road Parkway junction, buses will be routed off the mainline and along the on and off slip roads (widened to carry bus lanes) to the junction overbridge. As part of measures to improve road safety, the inbound carriageway cross-section will be reduced from four general traffic lanes and a bus lane to two general traffic lanes and a bus lane before the existing pedestrian crossing west of Morgan Place. This will reduce potential conflict in vehicle movements, between Morgan Place and the Navan Parkway off-slip junction.

- 3.19. Commensurate with the suburban nature of Navan Road between Auburn Avenue and Phoenix Park Avenue junctions, a consistent 60kph speed limit will be implemented. East of Phoenix Park Avenue junction, Navan Road enters an urbanised environment (including pedestrian crossings), a 50km/h speed limit will be implemented.
- 3.20. New bus stop lay-bys for inter-urban buses will be provided on both the inbound and outbound Navan Parkway off-slip ramps, with a new inline bus stop located on the inbound on-slip ramp.
- 3.21. The Proposed Scheme will provide Quiet Street Treatment for cyclists on Castleknock Manor to integrate with secondary route 4A of the Greater Dublin Area (GDA) Cycle Network Plan. The Auburn Avenue / Castleknock Manor roundabout will be modified to provide enhanced pedestrian and cyclist crossing facilities. Between Castleknock Manor and Ashtown Road junction, a two-way cycle track along the outer edge of the westbound (outbound) carriageway will be provided.
- 3.22. At the Ashtown Road junction, the two-way cycle track will be terminated west of the junction and will transition to a one-way cycle track on each side of the Navan Road carriageway east of the junction.
- 3.23. The two left-in / left-out junctions on opposite sides of Navan Road at Phoenix Park Avenue will be amended to operate as a staggered signal-controlled junction, which will allow left and right turns out of the side roads, left turns into the side roads and right-turns from the west into Phoenix Park Avenue. The central median between Phoenix Park Avenue junction and Ashtown Road junction will be removed to provide additional space for footpath and cyclist facilities and landscaped verges.
- 3.24. At the Navan Road / Ashtown Road junction, the existing roundabout will be modified to a signal-controlled crossroads, with separate pedestrian and cyclist crossings. The Blackhorse Avenue / Ashtown Gate Road junction, located to the south of the Ashtown Road junction, will be signalised.

#### Section 4

- 3.25. From Ashtown Road junction to the Navan Road / Old Cabra Road junction the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes.

3.26. Junction layouts will be amended to include the removal of the right turn filter lane from Navan Road (westbound) into Kempton Avenue and Ashtown Grove.

#### Section 5

3.27. The Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:

- No through traffic in the southbound direction at the northern end of Old Cabra Road (at its junction with Navan Road), except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road;
- No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus Gate.

3.28. On Old Cabra Road, the extent of the outbound bus lane will be limited to an approximate 110m section just south of the Navan Road junction. Glenbeigh Road / Old Cabra Road junction will become a signal-controlled junction, with the introduction of toucan crossings on the Old Cabra Road.

3.29. The Proposed Scheme will provide two one-way cycle tracks on each side of Old Cabra Road. The traffic lanes, bicycle infrastructure and footpaths will be accommodated within the existing road bridge width over the Heuston Station / Connolly Station railway line.

3.30. To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road / North Circular Road junction will be modified to allow right turns from Cabra Road to North Circular Road and left turns from North Circular Road onto Cabra Road.

3.31. On Prussia Street, between North Circular Road and the entrance to the Park Shopping Centre, the Proposed Scheme will provide:

- One southbound general traffic lane;

- One northbound 'straight-ahead only' lane for local traffic, taxis and buses travelling to Old Cabra Road; and
  - One left turn lane from Prussia Street to North Circular Road;
- 3.32. Right turn movement from Prussia Street to North Circular Road will be removed.
- 3.33. The junction of Prussia Street and North Circular Road will be upgraded to a signalised junction to provide separate crossing facilities for cyclists and pedestrians.
- 3.34. Along Prussia Street, a traffic lane will be provided in both directions, carrying buses and local traffic only. St Joseph's Road will be modified to include a one-way section at its eastern end (i.e. one-way in an eastbound direction).
- 3.35. A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists merge with general traffic just north of Park Shopping Centre.
- 3.36. In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph's Road
- 3.37. At the junction of Manor Street / Prussia Street with Aughrim Street, the Proposed Scheme will provide the following:
- In the northbound direction, a Bus Gate will be located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street;
  - In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction – and any general traffic travelling southbound on Prussia Street at this location will be required to turn right onto Aughrim Street;
  - The loading bay outside Kavanagh's Public house will be retained.
- 3.38. The Manor Street / Prussia Street / Aughrim Street junction will be modified to include a signal-controlled cycle crossing, along with urban realm improvements at this junction. The junction layout will include raised carriageway paving (i.e. raised table) to assist pedestrians crossing. The junction will include a southbound Bus Gate on Aughrim Street, preventing any general traffic from travelling from Aughrim Street onto Manor Street.

- 3.39. South of the Aughrim Street junction with Manor Street and Prussia Street, traffic signal controls will be included at the Manor Street / Kirwan Street / Manor Place staggered junction. The signal-controlled junction also includes a pedestrian crossing of Manor Street. Movements out of Kirwan Street will be restricted to left turn only, which will remain one-way westbound as at present. At the junction with Manor Street, Manor Place will be altered to a one-way street (i.e. one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic.
- 3.40. On Manor Street and Stoneybatter, the Proposed Scheme will provide two general traffic lanes and a cycle track in both directions to the junction with Brunswick Street North. The Proposed Scheme will provide protected parking bays on both sides of the road, and two loading bays.
- 3.41. In the northbound direction on Blackhall Place, the Proposed Scheme will provide a bus lane and a single general traffic lane, as far as the junction with King Street North. Northbound general traffic wishing to progress onto Manor Street will turn right onto King Street North (which will remain one-way eastbound), and then turn left onto George's Lane to travel westbound along Brunswick Street North.
- 3.42. The Proposed Scheme will include signal-controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction.
- 3.43. The Proposed Scheme will provide a cycle track in each direction along Brunswick Street North.
- 3.44. The Proposed Scheme will allow for general traffic exiting Arbour Hill to turn right only at the Stoneybatter junction. General traffic into Arbour Hill will be from Manor Street direction or Brunswick Street North only.
- 3.45. A southbound general traffic lane will be provided along Stoneybatter between Brunswick Street North and King Street North, with general traffic being required to turn left into King Street North as a result of a southbound Bus Gate at Blackhall Place / King Street North junction.
- 3.46. On Blackhall Place between Blackhall Street and Arran Quay, the carriageway arrangement will consist of a bus lane and general traffic lane in each direction.
- 3.47. On Blackhall Street, the road layout will be revised to include one lane for general traffic, a two-way cycle track, and angled parking. George's Lane will have one

northbound general traffic lane, with proposed new signal controls at the junction of Grangegorman Street Lower and Brunswick Street North.

- 3.48. Westbound general traffic from the City Centre on the eastern section of King Street North (east of George's Lane) will be restricted to left turns only, into Queen Street. On Queen Street, the Proposed Scheme will provide two southbound general traffic lanes.
- 3.49. From King Street North, the layout will reduce to one southbound general traffic lane from Blackhall Street to Ellis Quay / Arran Quay. The Proposed Scheme will provide a two-way cycle track on the eastern side of Queen Street from King Street North to Ellis Quay / Arran Quay.
- 3.50. A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace and on Charleville Road at its junction with North Circular Road.
- 3.51. No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road.
- 3.52. A short one-way southbound section is also proposed at the northern end of Cowper Street, with Aughrim Place becoming one-way southbound. There is also a short one-way westbound section at the western end of Swilly Road.
- 3.53. The Construction Phase for the Proposed Scheme is anticipated to take approximately 24 months to complete. It will be constructed based on individual sectional completions that will individually have shorter durations typically ranging between two to 12 months.
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## 4.0 Submissions

### 4.1 Prescribed Bodies

#### Dublin City Council

- In terms of planning policy, it is stated that the proposed development is in compliance with the RSES and is recognised as a development which will

support regional growth for the Eastern and Midlands Region and the Dublin MASP. High quality bus corridors will enable and support the delivery of both residential and economic development opportunities.

- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan.
- The Council will not comment on the acceptability of the EIAR.
- The NIS is acceptable, no concerns are raised in relation to the conclusion of the NIS.
- The development is largely on road and footpaths whereby there is no specific zoning objectives, the development does pass through a small section of the conservation area of Phibsborough Village, given the nature of the development it is stated that the proposal is unlikely to have any impact on the character of the conservation area.
- The council is satisfied that the proposed development which falls within the administrative boundary of the Council will not have any excessive or undue impact on the amenities of the area.
- Temporary traffic disruption is acknowledged but long-term impacts are considered to provide for enhanced amenities.
- The scheme is fundamental to achieving the objectives of compact and sustainable growth; sustainable mobility and permeability and place making, while significantly contributing towards climate action.
- It is submitted that the proposed development must not impede the development of Belcamp Lane lands as outline in the new DCC Development Plan.

#### Environment and Transportation Comments

- Overall strong support for proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.
- DCC links to bus information in relation to traffic flow management will be upgraded to improve this service and ensure free flow for buses. This digital improvement is necessary to ensure the scheme operates to its full potential.
- Scheme should seek to maintain existing footpath where possible and seek to improve pedestrian connectivity to bus stops.

- Where cycle lanes move behind bus stops and car parking areas, measures should be put in place to slow cyclist down.
- NTA should undertake a substantial awareness campaign and behavioural change programme.
- Changes to parking at commercial units is proposed, adequate set down for deliveries should be provided at these premises and changes to parking and road markings should be agreed with DCC.
- Where residential properties are to lose space adequate dimensions of 3mx5m should be retained to facilitate parking and adequate manoeuvring in these gardens.
- Greener and softer approach to the management of surface water drainage should be used.
- Clarity in relation to order of priority where cycleways and footpaths cross.
- Signage is recommended in this regard to protect physically disabled pedestrians.
- 1200 beds to be developed on Prussia Street, additional pedestrian facilities to be provided along the route towards Grange Gorman campus.
- SUDs to be included and agreed with DCC.
- Changes in ground levels should be modelled for flooding.

#### Archaeology

- Project runs through the Zone of Archaeological Constraint for two Recorded Monument listed on the Record of Monuments and Places –
  - ❖ DU018-020 – Historic City from Prussia Street until the southern termination of the scheme at Ellis Quay.
  - ❖ 8 Archaeological heritage features on the Record of Monuments
  - ❖ The archaeology department of the Council concurs with the broad methodology of the EIAR in relation to archaeology and monitoring.

#### Conservation Department

- Some elements of architectural Heritage have been mislabelled.
- Photomontages are lacking in a number of places.
- Objects to cantilever pole at St. Vincent's Home on the Navan Road (RPS 5808)
- Signage in close proximity to 74 Manor St.
- Impact to stone setts at Sisters of Charity Convent (RPS 4872)

- Changes to public realm at St. Peter's Church may impact ACA.
- Design of bus stops needs to be carefully considered.
- Potential for impacts to arise in relation to built heritage in general.
- ACAs – Route runs through Prussia Street, Blackhall Place Concerns relate to cumulative impacts.
- Potential for impacts to arise in relation to historic kerbing, pillar boxes, lamp standards and street furniture. Protection required during construction.
- Removal of trees may impact streetscapes of RPS.
- All measures to retain and protect historic paving, setts, kerbing and Associated features should be carried out.

#### Boundary treatments

- All boundary treatments that contribute to the special character of Protected Structures and their settings, ACAs and areas zoned Z2 in the City Development Plan should be retained where possible or where relocated are replaced on a like for like basis.
- All works should be supervised by an expert in architectural conservation.
- Relocation should respond to the parent structure.

#### General comments

- Street Furniture should be retained or sensitively relocated.
- Open spaces and gardens provide important function and should be retained where practicable.
- Loss of on street parking will place pressure on the need to alter front gardens.
- Measures to mitigate visual impact of bus stops/shelters should be used.
- Signage to be kept to minimal
- Red tarmac for cycle lanes may have impact on historic areas, an alternative colour will be required in these areas.
- Scheme will enhance a modal shift.
- Overlay of survey drawings at a larger scale over proposed drawings would have assisted in assessment.
- Scale of drawings too small, clarity in relation to quantity of compensatory street planting along route.
- Arborist and landscape architect should be appointed for duration of works to ensure trees indicated for retention are retained.

- List of recommended conditions are provided in the Appendix of the submission.

## **1. Fingal County Council**

- Supports scheme in general
- Clarify cycle parking solutions at bus stops this would enhance multimodal travel.
- FCC are working with MCC to develop multimodal travel along N3/M3 corridor.
- The design for the core bus corridor must be carried out in a way that does not hinder future safety and efficiency improvements on the N3 and nearby M50.
- In relation to the proposed design in the area between N3 Junction 1 (M50 J6) and N3 Junction 2 (Snugborough): -
  - Fingal County Council is concerned with the alterations proposed to the existing diverge lane between the Mill Road bridge and the access road to James Connolly Hospital. It would appear from the drawings that this taper diverge lane is being foreshortened due to the construction of the new bus lane. This is likely to give rise to traffic weaving, safety, and operational issues at this location on the N3 mainline carriageway. Fingal County Council requests that the length of the existing taper diverge lane be retained in so far as is possible, and that the existing overhead sign gantry is retained at approximate chainage A1750.
  - Fingal County Council would have concerns regarding the suitability of cyclists using the N3 mainline due to the speed, volume, and type of vehicles using the road. Fingal County Council accepts that a separate reduced speed limit of 60kph for the proposed bus lane is a suitable proposal and a byelaw implementation may be necessary in this regard. High quality segregated active travel infrastructure parallel to the N3 as defined in the NTA's GDA cycle network plan and allowed for in the Fingal Development Plan, such as the proposed Tolka Valley Greenway and the proposed improvements

through Blanchardstown village, would be safer and would likely prove more attractive to cyclists if in place.

- There are several roads that are not currently in public ownership, and it is not clear how bus lane enforcement, for example, will be carried out in this regard.
- The proposed extent of the circulatory road and interchange to be under public control should have a speed limit of not more than 50km/h but 30km/h will be more suitable at locations where there are pedestrians or cyclists crossing. A lower speed limit is all the more desirable given the likely trend of development in this area, with the bus interchange and future developments likely to significantly reduce car dependency in the longer-term.
- The retention of the bus lane from the proposed bus interchange all the way to the bus only on ramp at the Blanchardstown N3 interchange should be considered to allow for better management of the bus lane.
- The location of cycleways and the crossing for cyclists at any junctions should be designed to improve priority and safety for cyclists.
- Concerns regarding priority of pedestrians at junctions.
- Use of unused kerbed central reservation at Blanchardstown Road South (Mulhuddart Interchange) N3 bridge crossing for diversion of traffic and widening of footpath.
- Design of Blanchardstown station to enhance public realm.

### **Transport Infrastructure Ireland (TII)**

- General support for scheme.
- Concerns relate to the existing diverge lane between the Mill Road bridge and the access Rd. to the James Conley hospital, it was requested that the length of the existing taper diverge lane be retained as close to its existing configuration as possible and that the existing overhead sign gantry is retained at approximate chainage A1750.
- Concerns in relation to the use of the proposed bus connects bus lanes on the N3 by cyclists.
- Parallel cycle infrastructure alternatives would need to be in place prior to the opening of the bus connects corridor along the N3.

## **Department of Housing, Local Government and Heritage - DAU**

- Standard conditions are recommended in relation to archaeology and protection of water quality.
- No removal of trees/hedgerow during breeding season.

## **Inland Fisheries**

- Tolka – linkage for migrating salmon, sea trout and eels.
- Adequate protections are required during construction through environmental construction management planning.
- Guidelines on protection of fisheries during construction should be consulted.

### **4.2. NTA Response to prescribed Bodies**

### **4.3. Response to Dublin City Council**

4.4. There are numerous comments made by DCC within the submission in relation to design elements of the scheme and the NTA has responded to all such comments individually, in the interest of conciseness I will not summarise all such responses and refer the Board to the NTA's response to submissions should the need for further detail be required. The following is a summary of the main responses.

- The NTA acknowledges the comments made by DCC in relation to the policy context of the proposed scheme and the planning history along the route. In this regard the NTA have considered the potential for cumulative impacts to arise in relation to permitted development at no. 29b, 30 and 31 Prussia Street should construction occur simultaneously. Impacts in this regard are considered to be moderate.
- The NTA states that interface liaison will take place on a case-by-case basis through the NTA, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Scheme works and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately.
- The NTA acknowledges the commentary in section 2.2 of the DCC Submission in relation to Policy Context and notes that it generally aligns with the policy

context set out within the application documents namely EIAR Volume 4 Appendices Part 1 of 4, A2.1 Planning Report for the Proposed Scheme.

- In relation to zoning, the NTA notes that DCC sets out the view on page 17 of its submission that the Proposed Scheme is compatible with the Z1, Z2, Z3, Z4, Z5, Z6, Z9 and Z15 zones along its route.
- There will be a loss of 20 parking spaces in section 4 and 74 in section 5. The Proposed Scheme will formalise the parking arrangements to improve facilities for pedestrians and cyclists. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations, the overall impact of this loss of parking is considered to have a Slight to Moderate Negative effect overall along the Proposed Scheme.
- In relation to the public realm proposed area at the junction of Aughrim Street/Prussia Street/Manor Street it is not proposed to insert parking into this area.
- In relation to drainage, it is stated that no new outfalls are proposed as part of the Proposed Scheme. Any changes to drainage infrastructure will be carried out in consultation with the relevant local authority. The proposed networks are attenuated to existing runoff rates before discharging to the existing network. Where possible, SuDS and Green Infrastructure measures have been incorporated.
- A number of issues in relation to drawings etc are raised and I refer the Board to Section 2.4.7 in which all are responded to. It is of note that there is a typo at CH A9000 with regards to the existing CL & IL. This is not a material issue because the proposed tie-in IL at CH A9000 is 9.474m; the design is therefore viable at this point. The design been reviewed throughout to ensure that it is viable.
- In response to errors in drawings with specific regard to CH A7250, it is stated that according to record information, there is an existing surface water network in said catchment which does flow through Phoenix Park, but it ultimately discharges to a combined network which outfalls at Ringsend main lift pump house. This network has a high-level overflow into Phoenix Park.

- It is stated that the NTA will procure the services of a suitably qualified archaeologist as part of its Employer's Representative team administering and monitoring the works. A primary archaeological paper archive for all excavations will be prepared and deposited with the Dublin City Archaeological Archives.
- Photomontages are considered to be adequate by the NTA.
- In response to concerns about the impact of the new cantilever signal pole and alteration to the public realm and bus stop in the vicinity of St. Vincent's Home on the Navan Road (RPS 5808) it is stated that the pole and bus stop will be retained as the location is of medium sensitivity.
- It is stated that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Public Lighting Department inputs regarding the required light level design and the relevant EN certification as these matters were the subject of extensive liaison throughout the design development process.
- In relation to impacts to stone setts at curtilage of the entranceway at the Sisters of Charity Convent (RPS 4872), it is stated that the majority of these historic setts will be re-laid within the footpath section of the Proposed Scheme which will retain the positive contribution which they provide to the Protected Structure.
- In relation to the retention of the bus stop outside of Blackhall Place the NTA have stated that this will be retained. The existing shelter is set close to the wall and boundary railings to the Law Society grounds on Blackhall Place and is largely screened from the Law Society Buildings by the boundary treatment.
- It is stated that the proposed bus shelter on Cabra Road will replace a cluster of fingerpost bus stops, reducing street clutter. The shelter on the North Circular Road will also be partly obscured by the existing and proposed trees along the North Circular Road.
- With regard to the suggestion of providing high quality stone surfacing and/or low-level soft landscaping to the front of the church, this junction has been included within the Proposed Scheme is to facilitate the introduction of a right turn from Cabra Road to North Circular Road and a left turn from North Circular

Road onto Cabra Road. There will be no direct impact on the church or ACA from the proposed works. Consideration of appropriate materials will be considered.

- The NTA are of the view that provision of additional crossings as a result of recently approved applications within Prussia Street is a matter for DCC. The provision of these crossings as a result of separately approved planning applications does not fall within the remit of the Proposed Scheme. However, should they be required; they should be coordinated with the proposed crossing location for the Proposed Scheme.
- It is stated that the Proposed Scheme as submitted to An Bord Pleanála has been planned and assessed taking on board the DCC Roads Department inputs regarding Pay and Display parking and associated infrastructure for set down/loading for potentially impacted commercial units as these matters were the subject of extensive liaison throughout the design development process.
- In response to bus shelters near Protected Structures I note that the applicant states that new bus shelters will be retained and old ones replaced. No change to bus stops is proposed in terms of visual impact at these locations. Bus Shelters are stated to be of a high-quality design, constructed largely of glass panels with slimline stainless-steel frames. They are discreet and highly transparent so as to have minimal visual impact on their surroundings. This type of bus shelter is widely used across Dublin and was designed for use in visually sensitive locations, including in proximity to protected structures and historic buildings.
- The proposed bus stop at no. 68 Manor Street is located at the least sensitive location in relation to the Protected Structures at this location.
- In relation to accommodation works it is stated that as noted on the General Arrangement Drawings in Volume 3 of the EIAR, “Unless Noted Otherwise, where boundary walls/fences are being relocated and the existing access is less than 3.6 m in width, maximum width of new access will be 3.6 m, with the new driveway tying in with the existing driveway at the temporary land acquisition boundary.”

- In relation to cycle surfacing the following is stated: ‘The DCC Conservation Section request for an alternative high quality cycle lane surface in-lieu of red tarmacadam in certain locations is impractical in a city where this would require a change of the cycle track surfacing at numerous places. It is questionable if worthwhile benefit would derive from such superficial arrangements on the main arterial streets and roads in the Proposed Scheme. To locally modify the cycle track surface would be inconsistent, and it would diminish the effectiveness of distinguishing that part of the road visually to increase awareness of vehicle drivers of the need to safeguard the road space allocated to cyclists for safety reasons’
- Under the relevant legislation, upon the completion of the construction of the Proposed Scheme the NTA automatically ceases to be the road authority and the status of DCC as the relevant road authority is automatically restored – it does not require the operation of the conventional “taking-in-charge” arrangements provided for elsewhere in legislation.
- Details of street furniture and the palate of materials to be used will be decided in consultation with DCC.
- Further consultation with DCC will be carried out in relation to items such as water drinking fountains, art, side road entry treatments, signage (most will be retained with minimal new signage), compound proposed at Constitutional hill (at lands underutilised at present).
- In relation to footpaths, it is stated that widths will be retained with the exception of Mobhi Road. The details of the existing and proposed footpath widths are tabulated in the Preliminary Design Report (Supplementary Information lodged with the scheme application) in Table 4-2 on pages 35 to 44.
- Landscaping has been designed in consultation with an arborist.
- Trees on Mobhi Road – construction method will protect trees; concrete will be hand sawed and grass area hand dug. At Na Fianna, and at Home Farm Football Club, the existing large conifer trees along the boundary will be removed to enable widening of the footpath and cycle track along the eastern side of the public road. Replacement planting of new trees is proposed, subject

to agreement with the property owners. New trees are expected to be deciduous.

- Commentary is provided in relation to the recommended conditions, of note are the recommended conditions in relation to the hand over at the scheme completion. It is clearly outlined that the NTA are only the road authority during the works and all lands and infrastructure revert to DCC as the road authority upon completion.

### **Response to Fingal County Council**

- 4.5. NTA acknowledge FCC comments around their need for the scheme and reference to various plans affecting the area. The Proposed Scheme has retained the principles of the existing diverge layout. The proposed exit taper will reduce from 94m long to 80m long as a result of the Proposed Scheme, for an urban area of 80 km/h speed limit (refer to Figure 2.9.47 below). There are no significant changes to how the junction will perform operationally. In addition, the Stage 1 road safety auditor did not raise this issue as a 'problem' as part of the Stage 1 road safety audit.
- 4.6. In response to the use of bus lanes on N3 by cyclist, the applicant states that the Tolka Valley Greenway is intended to provide a safer route.
- 4.7. Traffic enforcement for areas of carriageway and associated footpaths and verges in Blanchardstown Shopping Centre not 'taken-in-charge' by the local authority are and will continue to be managed by Blanchardstown Shopping Centre Management Company.
- 4.8. Speed limit of 30 km/h in each location of the Bus Interchange at Blanchardstown, and the Navan Road / Old Cabra Road junction to Ellis Quay section of the CBC. A 350m section of the R147 from Phoenix Park Avenue junction to Ashtown junction will also see a reduction in speed limit to 50 km/h from 60 km/h in conjunction with a change in road classification from urban dual to urban single carriageway.
- 4.9. The proposed traffic lane width of 3.0m on Blanchardstown Road South will be retained. The specified lane widths are intended as an effective traffic calming measure.
- 4.10. Raised cycle lanes/tracks (with vertical and horizontal segregation) are proposed to adequately segregate cyclists from traffic.

- 4.11. Design ensures there are no instances of uncontrolled crossing locations traversing the main carriageways. Additionally, good inter-visibility exists at the crossing locations between drivers and pedestrians.
- 4.12. At the junction of Blanchardstown Road North / Old Navan Road, it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge.
- 4.13. N3 on-slip junction - The general arrangement of this junction needs to balance the management of traffic at this busy suburban junction adjacent to the shopping centre with provision of safe crossing facilities for pedestrians and cyclists, and the need to provide buses with reliable journey times to and from the bus interchange. To meet these needs and due to the multi-lane nature of the approach roads staggered crossings will be utilised at this location.
- 4.14. The left turn filter bus lane will allow a high degree of priority of buses which will include a regular flow of buses returning from the layover spaces on Blanchardstown Road South to the bus interchange. A left turn filter traffic lane from Blanchardstown Road South towards the shopping centre has been provided to facilitate the movement of traffic towards the shopping car parks. A pedestrian island has been provided between the left-turn lanes and straight-ahead lanes on Blanchardstown Road South – to provide pedestrians and cyclists with a safe crossing of the bus lane – while also providing a high level of priority for buses.
- 4.15. Footpath widths are above minimum.
- 4.16. The design for the bus interchange has been conceived to provide a high quality and visually appealing public space.
- 4.17. In relation to r147 Navan Parkway interchange the junction is based on a Type 1 layout as the volume of left turning vehicles will be greater than 100 PCUs per hour and no space is available for a dedicated left turning lane.
- 4.18. In relation to drainage, SUDs will be implemented throughout the scheme reducing flood risk.

### **Response to DAU**

- 4.19. In relation to archaeology the proposed condition to appoint a suitably qualified archaeologist is noted and engagement with all relevant stakeholders in this regard will be ongoing.
- 4.20. No removal of trees or vegetation shall occur during the main breeding season from March to August inclusive.
- 4.21. All the mitigation measures to avoid the pollution of surface water runoff from the proposed scheme, including construction compounds during the construction phase of the Proposed Scheme set out in the SWMP submitted in support of the application shall be implemented in full.
- 4.22. Trees and vegetation identified for removal will be removed in accordance with BS 3998:2010 Recommendations for Tree Work – refer to Chapter 17 (Section 17.5.1) of the EIAR for further information relating to mitigation for trees and vegetation to be retained/removed. As set out in section 12.5.1.5.1.2 of Chapter 12 of the EIAR.

### **Response to Inland Fisheries**

- 4.23. Section 13.5 of Chapter 13 (Water) in Volume 2 of the EIAR sets out the measures envisaged to avoid, prevent or reduce any potential significant adverse effects on the environment identified in Section 13.4 and, where appropriate, identify any proposed monitoring of the efficacy of implementing those mitigation measures.
- 4.24. All mitigation proposed within the EIAR and NIS will be implemented accordingly.

### **Response to TII**

- 4.25. The Proposed Scheme has retained the principles of the existing diverge layout. The proposed exit taper will reduce from 94m long to 80m long as a result of the Proposed Scheme, for an urban area of 80 km/h speed limit (refer to Figure 2.9.47 below). There are no significant changes to how the junction will perform operationally. In addition, the Stage 1 road safety auditor did not raise this issue as a 'problem' as part of the Stage 1 road safety audit.
- 4.26. In response to the use of bus lanes on N3 by cyclist, the applicant states that the Tolka Valley Greenway is intended to provide a safer route.

#### 4.27. **Third Party Observations**

4.28. 117 no. third party submissions have been received and are summarised within Appendix 1 of this memo, 10 of which have requested an Oral Hearing. In relation to the content of the submissions it is of note that many issues raised are common to all of the submissions. Submissions largely relate to the impacts to local residential streets around both Phibsborough and Stoneybatter as a result of road restrictions. Residents are concerned that the proposed scheme will increase traffic volumes on these narrow residential streets and will negatively impact their quality of life.

4.29. In addition, a number of submissions are concerned with the loss of trees and the layout of cycle lanes. Issues raised in submissions are summarised as follows, I refer the Board to Appendix I of this report to view a summary of individual submissions. The Board should note that the NTA's response to the submissions was circulated to all third parties and parties were given an opportunity to make comment on this response. An additional 29 submissions were subsequently received in this regard. Issues raised within these submissions are similar to those raised within the original submission. Many submissions are not satisfied with the NTA's response to their submissions and their positions remain unchanged.

- Principle of development, need and justification.
- Inadequate Consultation.
- Project Design – Provision for buses, cyclists and pedestrians,
- Bus Gate, Old Cabra Road and Prussia Street.
- Traffic calming Glenbeigh road.
- Removal of Ashtown roundabout
- Removal of trees
- Impact on Residential Amenity – air, noise, vibration
- Road safety
- Property Devaluation
- Impact on deliveries to Tesco Prussia street
- Slip Lane off N3

## **NTA Response to Submissions**

4.30. The NTA has responded to each submission individually within Section 3 of the response to submissions document and I refer the Board to same for further detail. Many of the issues raised are similar in nature and I will therefore outline the NTA's response to the issue raised rather than outline the response to each individual submission and where there are standalone issues raised I will refer to the particular submission and summarise the response accordingly. The Board should note that some issues raised are similar to this raised within the prescribed bodies above and as such to prevent repetition I will refer the Board to same.

### **Alternatives**

4.31. Reasonable alternatives are considered under Chapter 3 of the EIAR. The Route Options Assessment used a two-stage assessment process to determine the Emerging Preferred Route Option, comprising:

- Stage 1 – an initial high-level route options assessment, or 'sifting' process, which appraised routes in terms of ability to achieve scheme objectives and whether they could be practically delivered. The assessment included consideration of the potential high level environmental constraints as well as other indicators such as land take; and
- Stage 2 - Routes which passed the Stage 1 assessment were taken forward to a more detailed qualitative and quantitative assessment. All route options that progressed to this stage were compared against one another using a detailed Multi-Criteria Analysis in accordance with the Department of Transport Document "Common Appraisal Framework for Transport Projects and Programmes".

4.32. The response goes onto to outline the sub-criteria used to inform the emerging preferred route. The Board should note that the consideration of reasonable alternatives is examined in Section 9 of this report below and in the interest of conciseness I refer the Board to this section for further details of the approach used by the NTA in response to these issues.

### Loss of Ashtown roundabout

- 4.33. In response to the removal of the Ashtown roundabout it is stated that ‘The roundabout will be reconfigured as a signalised junction and this change presents an urban realm opportunity. The revised junction will greatly improve pedestrian and cycle facilities at the junction and conversion from a roundabout will provide substantial additional pedestrian space around the junction. This additional space will incorporate high quality hard and soft landscaping that establishes a contemporary landscape character at the junction that will become a new gateway landmark while also facilitating local pedestrian and cyclist movements.’
- 4.34. Bus priority is also better achieved with buses being able to move directly through the junction in their dedicated nearside bus lane. This is in comparison to a roundabout layout where turning traffic on the gyratory would have priority, even when signalised, over bus and general traffic on the Navan Road entry points.
- 4.35. Controlled junction will reduce traffic speeds.

### Removal of trees

- 4.36. The planting strategy includes replacement of street trees and groups of trees that may be impacted by the Proposed Scheme, but also the introduction of new tree planting and street trees within other spaces and along streets. Reinforcement of green infrastructure along the route will improve the overall amenity, character and appeal of the route corridor and localities along it, as well as enhancing biodiversity. In addition to trees and street trees, other vegetation is also proposed along the route including hedgerows, ornamental planting and amenity grassland, shrub and meadow grass areas. These will be utilised to reinstate property boundaries altered by the Proposed Scheme. The response outline’s locations along the route which will see the removal of and replanting of trees and vegetation.

### Public Consultation

- 4.37. The first issues responded to relates to compliance with the Aarhus Convention and the Kazakhstan advice. Ireland obligations under the Aarhus Convention has been fully incorporated into Irish Law and it is considered that the proposed development and associated consultation is in accordance with same.

- 4.38. It is stated that three rounds of consultation were undertaken with a number of methods used.
- 4.39. A second round of non-statutory public consultation ran from 4th of March 2020 to 17th of April 2020 but shortly thereafter due to the Covid-19 pandemic and the various government restrictions, all events forming part of this second round of non-statutory public consultation scheduled after 12th of March 2020 were cancelled. However, as the NTA had already received some written submissions by that date, the decision was made not to close the consultation entirely but instead to allow written submissions to continue to be made up until 17th of April 2020 which was the original deadline for such submissions. To further facilitate public engagement and participation, a third round of non-statutory public consultation took place from 4th of November 2020 to 16th of December 2020. With the continuing effect of the Covid-19 pandemic and associated government restrictions, the third round of non-statutory public consultation was held largely virtually.

#### Traffic impacts

- 4.40. It is noted that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Blanchardstown to City Centre Core Bus Corridor Scheme is that there is a reduction of 14% in the number of people travelling via car along the Navan Road corridor towards the city centre at AM peak hour. Similarly, in the PM peak hour, there is a reduction of 18% in the number of people travelling via car.
- 4.41. Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term.

#### Air quality

- 4.42. Chapter 7 'Air Quality' of Volume 2 of the EIAR considers the potential air quality impacts associated with both the Construction and Operational Phases of the Proposed Scheme. Section 7.1. In terms of construction traffic impacts, the Proposed Scheme will have a generally neutral impact on air quality, with some slight adverse impacts. Due to worst-case scenario modelling where in reality the works will be short-term and temporary in nature, the impact on air quality will not be significant. Therefore,

no specific construction phase mitigation measures for construction traffic are required.

- 4.43. As the Proposed Scheme will have a generally neutral impact on air quality, no specific Operational Phase mitigation measures are recommended.

#### Noise and Vibration

- 4.44. The contractor will put in place the most appropriate noise control measures depending on the level of noise reduction required at individual working areas, t intrusive works occurring within 60m of NSLs will need specific noise control measures to reduce impacts depending on time period over which they will occur, i.e. daytime or evening.
- 4.45. During surface breaking activities, there is potential for vibration to be generated through the ground. All construction works are orders of magnitude below limit values associated with any form or cosmetic or structural damage for structurally sound or protected or historical buildings or structures.

#### Road Safety

- 4.46. The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety and considers the perspective of all road users. All recommended measures or alternative measures proposed by the Designer were accepted by the Road Safety Audit Team.

#### Bus stops

- 4.47. Cycle stands can not be too close to bus stops for safety and accessibility reasons.
- 4.48. The bus stop review methodology included consideration of the capacity of each proposed bus stop to cater for the projected bus numbers. In a number of locations, existing and proposed bus stops were rationalised based on best practice principles related to bus stop placement.

#### Impact to Our Lady Help of Christians Catholic Parish Church

- 4.49. No lands are being permanently acquired at this location. The applicant will liaise with the Diocesan Trust / Parish Priest in order to ensure that access for hearses etc is maintained at the church.

### Impact to Property Values

- 4.50. Evidence shows that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

### Bus Gate

- 4.51. The Proposed Scheme along the Old Cabra Road section includes operation of bus gates on a 24-hour all-day basis. Existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services. In addition, access to Old Cabra Road is not being closed to cars.

### Impacts to surrounding road network.

- 4.52. Each road referred to within the third-party submissions is referred to within the NTA response, I direct the Board to section 2.3.3 in this regard. Overall, some roads will see a reduction in traffic and others will experience an insignificant increase.
- 4.53. An alternative route for deliveries to the Tesco on Prussia Street is outlined within the response.

### Impacts to Stoneybatter

- 4.54. Overall impacts are stated to be positive and car parking is available on surrounding streets within 200m.

### Modelling issues

- 4.55. I refer the Board to section 2.5.3.7 of the NTA response to submissions.
- 4.56. It is stated that a robust assessment has been undertaken, with reference to TII's Traffic and Transport Assessment Guidelines (May 2014). This document is considered best practice guidance for the assessment of transport impacts related to changes in traffic flows due to proposed developments and is an appropriate means of assessing the impact of general traffic trip redistribution on the surrounding road network.
- 4.57. Where road links have been identified as experiencing additional general traffic flow increases which exceed the above thresholds, further assessment has been

undertaken by way of a traffic capacity analysis on the associated junctions along the affected links.

#### Documents flaws

- 4.58. The applicant states that it is assumed that the submission is referring to diagram 6.24 in Chapter 6 as being an extract from Figure 6.7 in Volume 3 of the EIAR. Due to an administrative error, the correct version of 6.1 to 6.12 in Volume 3 of the Environmental Impact Assessment Report were not available on the NTA website ([www.blanchardstownscheme.ie](http://www.blanchardstownscheme.ie)) during the initial period for inspection and for the making of submissions/observations that ended on 30th August 2022 (although these figures were available for inspection at (i) the offices of the NTA, (ii) the offices of An Bord Pleanála and (iii) on the website of An Bord Pleanála at <https://www.pleanala.ie/en-ie/case/313892> .
- 4.59. This error was rectified on the NTA website for the Blanchardstown to City Centre Core Bus Corridor Scheme on 31 August 2022. Consequently, a further period of time for inspection and for the making of submissions/observations was provided for the Blanchardstown to City Centre Core Bus Corridor Scheme, as applied for under Section 51(2) of the Roads Act 1993 (as amended). This period of time was between 8th September 2022 and 3rd November 2022, which was advertised on 8th September 2022.

#### Mill Road access to bus stop

- 4.60. The primary changes in the view are the loss of mature trees along the edge of the N3, in the background of the view, and the introduction of replacement tree planting along a similar alignment. There would be a minor negative change to the character and visual amenity of the view which will reduce over time as the planting matures.

#### Castleknock Manor Quiet Street

- 4.61. Castleknock Manor leads to a residential area and is a cul-de-sac, thus will not be subject to through-traffic. It is also noted that an existing footpath is separated from the carriageway by a grass verge.

## 5.0 Planning History

5.1. There are many applications along the proposed route, however I note that the following are of significance and are identified with the Dublin City Council submission:

- ABP-309657-21 – Permission was granted for the demolition of the existing Park Shopping Centre and nos. 42-45 Prussia Street, construction of 175 no. residential units (3 no. houses, 29 no. Build to Rent apartments and 584 no. student bedspaces) and associated site works.
- ABP-312358-22 Permission was refused for the demolition of existing structures on site, including no. 23 Prussia Street and the remnants of the facades of no. 24 and no. 25 Prussia Street, construction of 162 no. Build To Rent apartments and associated site works.
- ABP-312102-21 Permission was granted for the demolition of industrial sheds and workshops, construction of 236 no. student bedspaces and associated site works.

## 6.0 Policy Context

### 6.1. European

#### 6.2. Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)

The Smart and Mobility Strategy is part of the EU Green Deal and aims to reduce transport emissions by 90% until 2050. The Commission intends to adopt a comprehensive strategy to meet this target and ensure that the EU transport sector is fit for a clean, digital and modern economy. Objectives include:

- increasing the uptake of zero-emission vehicles
- making sustainable alternative solutions available to the public & businesses
- supporting digitalisation & automation
- improving connectivity & access.

#### 6.3. European Green Deal (EDG) 2019

The European Commission has adopted a set of proposals such as making transport sustainable for all, to make the EU's climate, energy, transport and taxation **policies**

**fit for reducing net greenhouse gas emissions by at least 55% by 2030**, compared to 1990 levels.

#### **6.4. Towards a fair and sustainable Europe 2050: Social and Economic choices in sustainability transitions, 2023.**

This foresight study looks at sustainability from a holistic perspective but emphasises the changes that European economic and social systems should make to address sustainability transitions. The EU has committed to sustainability and sustainable development, covering the three dimensions (environmental, social and economic) of sustainability. Transport is identified as an area of opportunity to increase the speed of a cultural shift towards sustainability. The provision of well planned, affordable or free public transport system and bicycle lanes are encouraged.

#### **6.5. Regional**

#### **6.6. Regional Spatial Economic Strategy for the Eastern and Midlands Region**

- Chapter 5 Dublin Metropolitan Area Strategic Plan (MASP)
  - The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area that sets out a vision for the future growth of the metropolitan area and key growth enablers.
  - Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area - Integrated Transport and Land use which seeks to focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of '**BusConnects**', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.
  - MASP Sustainable Transport RPO 5.2: Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.

- RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
- Section 5.6 Integrated Land use and Transportation-
  - Key transport infrastructure investments in the metropolitan area as set out in national policy include:
  - Within the Dublin Metropolitan Area, investment in bus based public transport will be delivered through BusConnects, which aims to overhaul the current bus system in the Dublin metropolitan area, including the introduction of Bus Rapid Transit.
- Chapter 8 Connectivity
  - Section 8.4 Transport Investment Priorities:
    - Within the Dublin Metropolitan Area, investment in bus infrastructure and services will be delivered through BusConnects.
  - Section 8.5 International Connectivity:
    - RPO 8.18: Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, connections from the road network from the west and north. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.

## 6.7. National

## 6.8. National Sustainable Mobility Policy, 2022

The purpose of this document is to set out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

A key objective of the document is to expand the bus capacity and services through the BusConnects Programmes in the five cities of Cork, Dublin, Galway, Limerick and Waterford; improved town bus services; and the Connecting Ireland programme in rural areas.

#### **6.9. National Sustainable Mobility Policy Action Plan 2022-2025**

BusConnects is identified as a key project to be delivered within 2025.

#### **6.10. Permeability in Existing Urban Areas Best Practice Guide 2015**

Among the priorities of the National Transport Authority (NTA) are to encourage the use of more sustainable modes of transport and to ensure that transport considerations are fully addressed as part of land use planning. This guidance demonstrates how best to facilitate demand for walking and cycling in existing built-up areas.

#### **6.11. Department of Transport National Sustainable Mobility Policy on 7th April 2022.**

The plan, prepared by the Department of Transport, includes actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to car journeys.

- United Nations 2030 Agenda

#### **6.12. Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020**

This is a government document that was prepared in the context of unsustainable transport and travel trends in Ireland. The overall vision set out in this policy document is to achieve a sustainable transport system in Ireland by 2020.

To achieve this the government set out 5 key goals

- (i) to reduce overall travel demand,
- (ii) to maximise the efficiency of the transport network,
- (iii) to reduce reliance on fossil fuels,
- (iv) to reduce transport emissions and
- (v) to improve accessibility to transport.

To achieve these goals and to ensure that we have sustainable travel and transport by 2020, the Government sets targets, which include the following:

- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.

### 6.13. National Planning Framework Project Ireland 2040

The National Policy Position establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050,

Managing the challenges of future growth is critical to regional development. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.

#### National Strategic Outcome 4

- NSO 4 - Dublin and other cities and major urban areas are too heavily dependent on road and private, mainly car based, transport with the result that our roads are becoming more and more congested. The National Development Plan makes provision for investment in public transport and sustainable mobility solutions to progressively put in place a more sustainable alternative. For example, major electric rail public transport infrastructure identified in the Transport Strategy for the Greater Dublin Area to 2035, such as the Metro Link and DART Expansion projects as well as the BusConnects investment programme, will keep our capital and other key urban areas competitive.
- Deliver the key public transport objectives of the Transport Strategy for the Greater Dublin Area 2016-2035 by investing in projects such as New Metro Link, DART Expansion Programme, BusConnects in Dublin and key bus-based projects in the other cities and towns.

#### **6.14. National Development Plan 2021-2030**

The NDP Review contains a range of investments and measures which will be implemented over the coming years to facilitate the transition to sustainable mobility. These measures include significant expansions to public transport options, including capacity enhancements on current assets and the creation of new public transport links through programmes such as Metrolink.

The NDP recognises Busconnects as one of the Major Regional Investments for the Eastern and Midland Region and this scheme is identified as a Strategic Investment Priority within all five cities.

Over the next 10 years approximately €360 million per annum will be invested in walking and cycling infrastructure in cities, towns and villages across the country.

Transformed active travel and bus infrastructure and services in all five of Ireland's major cities is fundamental to achieving the overarching target of 500,000 additional active travel and public transport journeys by 2030. BusConnects will overhaul the current bus system in all five cities by implementing a network of 'next generation' bus corridors including segregated cycling facilities on the busiest routes to make journeys faster, predictable and reliable.

Over the lifetime of this NDP, there will be significant progress made on delivering BusConnects with the construction of Core Bus Corridors expected to be substantially complete in all five cities by 2030.

#### **6.15. National Investment Framework for Transport in Ireland, 2021**

One of the key challenges identified within this document relates to transport and the ability to maintain existing transport infrastructure whilst ensuring resilience of the most strategically important parts of the network. Population projections are expected to increase into the future and a consistent issue identified within the five cities of Ireland is congestion. Given space constraints, urban congestion will primarily have to be addressed by encouraging modal shift to sustainable modes.

Within the cities, frequent and reliable public transport of sufficient capacity and high-quality active travel infrastructure can incentivise people to travel using sustainable modes rather than by car.

Bus Connects is identified as a project which will alleviate congestion and inefficiencies in the bus service. The revised NDP 2021- 2030 sets out details of a new National

Active Travel Programme with funding of €360 million annually for the period from 2021 to 2025. A new National Cycling Strategy is to be developed by the end of 2022, and will map existing cycling infrastructure in both urban and rural areas to inform future planning and project delivery decisions in relation to active travel.

#### **6.16. Design Manual for Urban Roads and Streets, 2019**

This Manual provides guidance on how to approach the design of urban streets in a more balanced way. To encourage more sustainable travel patterns and safer streets, the Manual states that designers must place the pedestrian at the top of the user hierarchy, followed by cyclists and public transport, with the private car at the bottom of the hierarchy. The following key design principles are set out to guide a more place-based/ integrated approach to road and street design.

- To support the creation of integrated street networks which primate higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.
- The promotion of multi functional, placed based streets that balance the needs of all users within a self regulating environment.
- The quality of the street is measured by the quality of the pedestrian environment.
- Greater communication and communication and cooperation between design professionals through the promotion of a plan-led multidisciplinary approach to design.

The manual recommends that bus services should be directed along arterial and link streets and that selective bus detection technology should be considered that prioritises buses. It is noted that under used or unnecessary lanes can serve only to increase the width of carriageways (encouraging greater speeds) and can consume space that could otherwise be dedicated to placemaking /traffic calming measures.

#### **6.17. Climate Action Plan 2023**

- The Climate Action Plan (CAP23) sets out a roadmap to halve emissions by 2030 and reach net zero by 2050. CAP23 will also be the first to implement carbon budgets and sectoral emissions ceilings that were introduced under the Climate Action and Low Carbon Development (Amendment) Act, 2021. Sector emission ceilings were approved by

Government in July 2028 for the electricity, transport, built environment – residential, built environment – commercial, industry, agricultural and other (F-gases, waste & petroleum refining) sectors. Finalisation of the emissions ceiling for the Land Use, Land Use Change and Forestry (LULUCF) sector has been deferred for up to 18 months from July 2022.

- Citizen engagement and a strengthened social contract between the Government and the Irish people will be required around climate action. Some sectors and communities will be impacted more than others. A just transition is embedded in CAP23 to equip people with the skills to benefit from change and to acknowledge that costs need to be shared. Large investment will be necessary through public and private sectors to meet CAP23 targets and objectives.
- The electricity sector will help to decarbonise the transport, heating and industry sectors and will face a huge challenge to meet requirements under its own sectoral emissions ceiling. CAP23 reframes the previous pathway outlined in CAP21 under the Avoid-Shift-Improve Framework to achieve a net zero decarbonisation pathway for transport. This is a hierarchical framework which prioritises actions to reduce or **avoid** the need to travel; **shift** to more environmentally friendly modes; and **improve** the energy efficiency of vehicle technology.
- Road space reallocation is a measure outlined under both ‘avoid’ and ‘shift’ to promote active travel and modal shift to public transport. It is recognised that road space reallocation can redirect valuable space from on-street car-parking and public urban roadways to public transport and active travel infrastructure (such as efficient bus lanes, and more spacious footpaths and segregated cycle-lanes), whilst also leading to significant and wide-scale improvements in our urban environments. A National Demand Management Strategy will be developed in 2023 with the aim of reducing travel demand and improving sustainable mobility alternatives.
- The major public transport infrastructure programme set out in the NDP rebalances the share of capital expenditure in favour of new public transport schemes over road projects. BusConnects in each of our 5 cities,

the DART+ Programme and Metrolink will continue to be progressed through public consultations and the planning systems. BusConnects is a key action under the major public transport infrastructure programme to deliver abatement in transport emissions, as outlined in CAP23 for the period 2023-2025.

### **Cycle Design Manual, NTA, 2023**

This new Cycle Design Manual supersedes the National Cycle Manual. The new manual draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.

## **6.18. Local**

### **Dublin City Development Plan 2022-2028**

- Chapter 8 Sustainable Movement and Transport
  - Table 8.1 Current and target mode share outlines that cycling is expected to increase by 7% by 2028 and bus by 3% in the same timeline.
  - It is stated that the modest increase in public transport mode share anticipates the construction of major public transport infrastructure that is proposed to occur over the lifetime of the plan. The impact of public transport infrastructure projects on mode share is more likely to come into fruition during the lifespan of the following plan.
  - Dublin City Council recognises and welcomes the opportunities for developing public realm around the city and in the urban villages where new public transport proposals are being developed such as Metrolink, BusConnects and the Luas expansion and DART+ project.
  - Key strategic transport projects such as the proposed Metrolink, DART+, BusConnects programme and further Luas Line and rail construction and extension will continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years. Dublin

City Council actively supports all measures being implemented or proposed by other transport agencies to enhance capacity on existing lines/services and provide new infrastructure.

- SMT22 - Key Sustainable Transport Projects To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: • DART + • Metrolink from Charlemount to Swords • BusConnects Core Bus Corridor projects • Delivery of Luas to Finglas • Progress and delivery of Luas to Poolbeg and Lucan

The Proposed Scheme, for the most part, will comprise lands within the existing public road and pedestrian pavement area where there is no specific zoning objective.

Zoning objectives that are affected by the proposed scheme:

- Zone Z1 – Sustainable Residential Neighbourhoods To protect, provide and improve residential amenities.
- Zone Z2 – Residential Neighbourhoods (Conservation Areas) To protect and/or improve the amenities of residential conservation areas.
- Zone Z3 – Neighbourhood Centres To provide for and improve neighbourhood facilities.
- Zone Z4 – District Centres To provide for and improve mixed-services facilities.
- Zone Z6 – Employment / Enterprise To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.
- Zone Z9 – Recreational amenity and open space To preserve, provide and improve recreational amenity and open space and green networks
- Zone Z15 – Institutional and Community To protect and provide for institutional and community uses.

## 6.19. Fingal County Development Plan 2023-2029

Fingal is set to benefit from major rail and bus projects such as MetroLink, BusConnects and DART+ and LUAS Expansion under the National Development Plan 2021–2030. These projects are identified as key growth enablers for Fingal in the NPF and will significantly increase capacity and allow more services to operate across the region, facilitating Fingal’s vision for compact growth and sustainable mobility, serving key destinations and facilitating opportunities along the route for high-density residential development, mixed-use and employment generating activities.

### MRE – Metro and Rail Economic Corridor.

Objective Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor.

- Policy CSP26 – Consolidation and Growth of Swords - Promote and facilitate the long-term consolidation and growth of Swords as a Key Town including the provision of key enabling public transport infrastructure, including MetroLink and BusConnects, in accordance with the relevant provisions of the NPF, RSES and the MASP
- Objective CMO23 – Enabling Public Transport Projects - Support the delivery of key sustainable transport projects including MetroLink, BusConnects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes to serve needs of the County and the mid-east region in collaboration with the NTA, TII and Irish Rail and other relevant stakeholders.
- Objective CMO24 – NTA Strategy Support NTA and other stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART +, LUAS and the GDA Cycle Network.
- Section 7.3 - Infrastructure provision will be a key factor for the economic development of the County and the prospective MetroLink, BusConnects and Dart + projects will bring significant economic benefits to Fingal. Transport and infrastructure interventions are expected to facilitate the modal shift in alignment with the policy hierarchy and national, regional and local objectives

such that they encourage sustainable ways of improving Fingal's integration, connectivity and the movement of workers.

## 6.20. **Greater Dublin Area Transport Strategy – 2022-2042**

This strategy replaces the previous GDA Transport Strategy 2016-2035. Busconnects is identified as a major project which is provided for within this strategy. The NTA has invested heavily in the renewal of the bus infrastructure, including bus stopping facilities, Real Time Passenger Information and fleet improvements and has commenced the largest ever investment programme in our bus network under BusConnects Dublin.

The Strategy recognises the government's commitment to sustainable mobility as outlined in NSO 4 of the National Development Plan 2021-2030.

Busconnects is identified as an essential to protecting access to Dublin Airport, ensuring that the Airport will operate in a sustainable fashion in terms of landside transport.

- **Measure INT2 – International Gateways**

It is the intention of the NTA, in conjunction with public transport operators, TII, and the local authorities, to serve the international gateways with the landside transport infrastructure and services which will facilitate their sustainable operation. Throughout the lifetime of the strategy, the NTA will continue to work with Dublin Port Company, other port and harbour operators and DAA in respect of Dublin Airport, in monitoring, assessing and delivering these transport requirements.

Major transport interchanges are recognised as an integral part of the bus connects project.

- **Measure INT5 – Major Interchanges and Mobility Hubs**

It is the intention of the NTA, in conjunction with TII, Irish Rail, local authorities, and landowners to deliver high quality major interchange facilities or Mobility Hubs at appropriate locations served by high capacity public transport services. These will be designed to be as seamless as possible and will incorporate a wide range of facilities as appropriate such as cycle parking, seating, shelter, kiosks selling refreshments plus the provision of travel information in printed and digital formats.

The NTA recognises that the construction of major projects including bus connects will cause disruption and it will seek to minimise such impacts through up-to-date travel information.

- Section 11.4 Cycle Infrastructure Provision and Management
- Section 12.2 Bus
- Measure BUS1 – Core Bus Corridor Programme

Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme

- Measure BUS2 – Additional Radial Core Bus Corridors

It is the intention of the NTA to evaluate the need for, and deliver, additional priority on radial corridors.

- Measure BUS3 – Orbital and Local Bus Routes

It is the intention of the NTA to provide significant improvements to orbital and local bus services in the following ways: 1. Increased frequencies on the BusConnects orbital and local services; and 2. Providing bus priority measures at locations on the routes where delays to services are identified.

- Section 12.2.4 Zero Emissions Buses

The transition to a zero emissions urban bus fleet for the State operated bus services has begun under BusConnects. Under the BusConnects Dublin programme, the full Dublin Area urban bus fleet will have transitioned to zero or low emission vehicles by 2030 and will have been converted to a full zero emission bus fleet by 2035.

- Measure BUS6 – Higher Capacity Bus Fleet

In the later phases of the Transport Strategy period, it is the intention of the NTA to introduce higher capacity bus vehicles onto select appropriate BusConnects corridors in order to increase passenger carrying capabilities in line with forecast demand.

- 12.2.8 New Bus Stops and Shelters

Bus shelter provision will be significantly expanded as part of the BusConnects Dublin programme and Connecting Ireland (section 12.2.7).

- 13.8 Road space Reallocation

In line with transport policies and objectives to reduce car dependency and to favour sustainable modes over the private car, and as a means of achieving reductions in carbon emissions, it is the intention to reallocate roadspace from its current use for general traffic to the exclusive use by walking, cycling and public transport. This approach is applicable generally across the GDA, and in addition to the reallocation proposed under BusConnects.

- **Measure Road 13 – Roadspace Reallocation**

The local authorities and the NTA will implement a programme of roadspace reallocation from use by general traffic or as parking to exclusive use by sustainable modes as appropriate, as a means of achieving the following: y Providing sufficient capacity for sustainable modes; y Improving safety for pedestrians and cyclists; and y Encouraging mode shift from the private car and reducing emissions.

#### **6.21. Dublin City Biodiversity Action Plan 2021-2025.**

The Dublin City Biodiversity Action Plan 2021-2025 (DCC Biodiversity Plan) recognises that in addition to legally designated sites there are numerous habitats across the city that have conservation value for biodiversity, including public parks and open spaces, rivers, canals, and embankments. The DCC Biodiversity Plan sets out five themes supported by objectives and actions; these themes are set out below:

- Maintaining Nature in the City.
- Restoring Nature in the City.
- Building for Biodiversity.
- Understanding Biodiversity in the City
- Partnering for Biodiversity.

The objectives of the DCC Biodiversity Plan include:

- Objective 4 – Monitor and conserve legally-protected species within Dublin City, particularly those listed in the annexes of the EU Birds and Habitats Directive,
- Objective 11 – Ensure that measures for biodiversity and nature-based solutions are incorporated into new building projects, retrofit and maintenance works, and

- Objective 12 which promotes net biodiversity gain.

### **Fingal Biodiversity Action Plan 2023-2030**

This plan provides a framework for biodiversity action for the next 8 years with the aim of halting the loss of biodiversity in Fingal.

#### **6.22. Legislative Context**

6.23. Under Section 51(2) of the Roads Act, 1993 (as amended by Section 9(1)(e)(i) of the Roads Act, 2007), a road authority shall apply to the Board for the approval of a proposed road development and shall submit to the Board an Environmental Impact Assessment Report (EIAR) in respect of the development. The proposed road development shall not be carried out unless the Board has approved it or approved it with modifications. The Board shall ensure that it has, or have access as necessary to, sufficient expertise to examine the EIAR.

6.24. Before approval of the proposed road development, consideration must be given to the EIAR, any additional information, any submissions made in relation to the likely effects on the environment of the proposed road development, and the report and any recommendation of the person conducting any inquiry. Taking into account the preceding, the Board shall reach a reasoned conclusion on the significant effects of the proposed road development on the environment.

#### **6.25. Natural Heritage Designations**

6.26. The following Special Areas of Conservation and Special Protection Areas are contained within the zone of Influence for the proposed development:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Baldoyle Bay SAC,
- Howth Head SAC,
- Rockabill to Dalkey Island SAC,
- Lambay Island SAC,

- Howth Head Coast SPA,
- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- Baldoyle Bay SPA,
- Dalkey Islands SPA,
- Malahide Estuary SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Rockabill SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and,
- The Murrough SPA..
- North West Irish Sea SPA

6.27. A Natura Impact Statement (NIS) has been prepared with regard to the foregoing European Sites and has been submitted to the Board in respect of the proposed road development under Part XAB of the Planning and Development Act 2000 (as amended).

#### 6.28. **EIA Screening**

6.29. The NTA has submitted to the Board the Environmental Impact Assessment Report (EIAR) prepared in accordance with section 50 of the Roads Act 1993 (as amended) and Directive 2011/92/EU of the European Parliament and Council, 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 in respect of the proposed road development.

## 7.0 Assessment

- 7.1. The proposed development as outlined above is essentially an upgrade to the existing bus priority and cycle facilities. The Proposed Scheme includes a substantial increase in the level of bus priority provided along the Blanchardstown to City Centre roads into and out of the city including the provision of additional lengths of bus lane, resulting in improved journey time reliability.
- 7.2. Throughout the Proposed Scheme cycle facilities will be substantially improved with segregated cycle tracks provided along the aforementioned route and protected junctions with enhanced signalling for cyclists provided at junctions. Where space for a segregated cycle track is not available on the main corridor, such as the R147 between the Ashtown Roundabout and Castleknock Manor an alternative cycle route via quiet roads is proposed.
- 7.3. Pedestrian facilities will also be upgraded, and additional signalised crossings are to be provided. In addition, public realm works will be undertaken at key locations with higher quality materials, planting and street furniture provided to enhance the pedestrian's experience.
- 7.4. This application is accompanied by a separate Compulsory Purchase Order ref: ABP-313961-22 in which it is sought to acquire various sections of lands along the route. The majority of lands to be acquired relate to the accommodation of construction compounds and a number of boundary setbacks to accommodate proposed cycle lanes or road widening.
- 7.5. Given the variety of issues raised within the submissions received, I will consider the issues raised on a themed basis within the relevant sections of the report hereunder. All submissions are summarised within appendix 1 and 2 below for ease of reference and the NTAs response to submissions has been summarised above also.
- 7.6. I have read the entire contents of the file including the EIAR, Planning Report and supporting documentation and the NIS all submitted with the application. I have visited the subject site and its surroundings. I have read in full the submissions submitted in respect of the application including the third-party submissions, the submissions from the Planning Authorities and the submissions from prescribed bodies. I consider the critical issues in determining the current application before the Board are as follows:

- Principle of development, need and justification.
- Adequacy of Consultation.
- Project Design – Provision for buses, Bus Gate, Traffic re-distribution, provision for cyclists and pedestrians,
- Removal of Ashtown roundabout
- Residential Amenity
- Visual Impact
- Property Devaluation
- Prussia Street - Park Shopping Centre / Tesco
- Other issues raised.
- Appropriate Assessment.
- EIAR.

**Principle of development, need and justification.**

- 7.7. The proposed development is being developed in response to the need for a sustainable, reliable form of public transport along the main radial routes from the City Centre. Sustainable transport infrastructure is known to assist in creating more sustainable communities and healthier places to live and work while also stimulating our economic development and also contributes to enhanced health and well-being when delivered effectively.
- 7.8. According to the National Planning Framework, 2018, the population of the Greater Dublin Area is forecast to increase by 25% by 2040 and this growth will have associated travel demands, placing added pressure on the transport system. Significant congestion already occurs throughout the GDA from private car dependence and intervention is therefore required to optimise road space and prioritise the movement of people over the movement of vehicles.
- 7.9. At present, the reliability and effectiveness of existing bus and cycle infrastructure on key radial traffic routes into and out of Dublin city centre is compromised by a lack of bus lanes and segregated cycle tracks. Furthermore, existing bus lanes are often shared with parking and cyclists and are not always operational on a 24 hour basis.

- 7.10. As noted above, the overriding motivation for BusConnects is to reduce CO<sub>2</sub> emissions and this is critical from a global climatic perspective. The proposed scheme is specifically identified and supported within the Climate Action Plan 2023 and is seen as a key action under the major public transport infrastructure programme to deliver abatement in transport emissions. The scheme is also identified within the National Sustainable Mobility Policy document and the accompanying action plan as a key piece of infrastructure to be delivered to achieve reductions in emissions and provide for more efficient cities in terms of accessibility for all. The scheme is also seen as an economic driver within the city which currently experiences significant congestion and impediments to movement and accessibility.
- 7.11. At the local and shorter-term level, the issue of congestion is more obvious, and both congestion and CO<sub>2</sub> emissions are continuing to rise. Any further increases in traffic levels will see an exacerbation of congestion, CO<sub>2</sub> emissions and of all the associated issues highlighted above. Private car dependence will worsen unless there is intervention to optimise road space and prioritise the movement of people over the movement of vehicles.
- 7.12. When examining the functionality and capacity of road space to facilitate the movement of people it is important to consider the capacity of the space and how to optimise it. The applicant within the documentation submitted raises the following:
- ‘It is estimated that approximately 80% of road/ street space is dedicated to the car. A car travelling at 50kph requires 70 times more space than a pedestrian or cyclist. A double-deck bus takes up the equivalent spatial area of three cars but typically carries 50-100 times the number of passengers’.
- 7.13. The prioritisation of buses over cars and the creation of more space for pedestrians and cyclists will therefore allow for increased people movement capacity along the core bus corridor. This is vital given the existing congestion and the forecasted growth in population, jobs and goods vehicle numbers by 2040. The proposed scheme is expected to see a 14% reduction in car use along the route and an increase in cycling and walking of 53%, in addition to a 76% increase in bus use.
- 7.14. Having regard to the above, the proposed scheme is of critical importance to the transport network in Dublin to facilitate the actual movement of people and this can only be achieved through a realistic modal shift from the private car to sustainable

modes. The proposed scheme allows for increased people moving capacity and the best chance to avoid gridlock in future years as the population grows and the demand for travel increases. The proposed scheme also has the potential to reduce Ireland's greenhouse gas emissions significantly. The proposed scheme will therefore make a significant contribution to carbon reduction, the easing of congestion and the creation of more sustainable travel patterns for the growing population.

- 7.15. BusConnects is identified as a component of a Strategic Investment Priority which has been determined as central to the delivery of the National Planning Framework. The proposed scheme is also consistent with all levels national, regional and local policy relating to climate action and sustainable transport provision.
- 7.16. In terms of local transport need it is outlined by the applicant that bus priority along the proposed route is provided along approximately 25% of the length of the route. The Proposed Scheme will facilitate 97% bus priority and complement the rollout of the Dublin Area Bus Network Redesign to deliver improved bus services on the route. This will improve journey times for buses, enhance their reliability and provide resilience to congestion.
- 7.17. One of the key objectives of the Proposed Scheme is to enhance interchange between the various modes of public transport operating in the city and wider metropolitan area. The CBC Infrastructure Works, including the Proposed Scheme, are developed to provide improved existing or new interchange opportunities with other existing and planned transport services, including:
- Existing Dublin Bus and other bus services;
  - The Greater Dublin Area (GDA) Cycle Network Plan;
  - Future public transport proposals such as the DART+ Programme and MetroLink; and
  - Supporting the Dublin Bus Network Re-design
- 7.18. With regard to cycling it is stated that 9% of the route provides for segregated cycle tracks and 34% of the route provides for non-segregated cycle lanes. The remaining extents have non-segregated cycle lanes or cyclists must cycle in the bus lanes where provided, with no provisions in some critical places such as along the R147. High-quality cycle facilities in the Proposed Scheme will increase to 93% consisting mainly

of segregated cycle tracks in both directions and the remainder using quiet streets. The improvements to cycle infrastructure will vastly improve the current offer to cyclists and by doing so will significantly increase the modal share.

- 7.19. It is important to note that the Blanchardstown to city centre route serves some of the busiest bus routes in Dublin. Demand for travel by bus is anticipated to continue to grow in this corridor into the future, in line with population growth.
- 7.20. The proposed scheme will deliver the physical infrastructure necessary to sustain the projected population growth along and within the area of the route. It will also provide a more accessible public transport facility to the most vulnerable in society in a safe, well-lit and protected environment.
- 7.21. The Board should note at this juncture that Prussia Street has been added to one of the Strategic Development Regeneration Areas (SDRA) identified within the Dublin City Development Plan (2022-28) as an amendment to the original extent of the SDRA. Concerns have been raised within the submissions in relation to the development in the context of the SDRA. It is contended that the proposed development would impede the achievement of objectives set out for the development of such a regeneration area and as such would be contrary to the provisions of the development plan.
- 7.22. The Board should note that the application documentation does not consider the relevance of this designation in relation to Prussia Street as the application was submitted prior to the boundary amendment. Nonetheless I have reviewed the Development Plan in this regard and note that the development principles of such areas promote permeability and connectivity to surrounding neighbourhoods with an emphasis on high quality public transport. The proposed scheme would therefore comply with the policy position outlined for such areas and is therefore acceptable in this regard.
- 7.23. In overall conclusion it is clear that there is an obvious need and justification for the proposed scheme which has been clearly demonstrated from a population growth and congestion perspective and in the interests of land use and transport planning integration. It is also clear from the abundance of policy documents and plans at both an EU, national and local level that the proposed scheme is supported throughout all levels of government policy and is therefore justified and acceptable in principle.

## **Adequacy of Consultation**

- 7.24. It is important to consider the adequacy of the consultation undertaken by the NTA in relation to the proposed development. I note that a number of concerns are raised within the third-party submissions received in relation to the type and frequency of consultation carried out. There are concerns that the public were not made fully aware of the details of the proposed scheme and were not involved in the design process.
- 7.25. I refer the Board to the NTA's response to concerns raised in relation to the consultation process and consider it important to reiterate at this juncture the key points that have been made within it.
- 7.26. It is contended by the NTA that compliance with the Aarhus Convention is an integral part of the statutory process and is provided for within relevant legislation i.e. the Planning and Development Regulations, 2001, as amended and the Planning and Development Act, 2000, as amended. The erection of site notices, publishing newspaper notices, the use of a dedicated website and the seeking of submissions from the public and other stakeholders is required and part of the consenting process carried out by An Bord Pleanála. Given that the applicant has complied with all such requirements I am satisfied that the proposed development process adequately complies with the requirements of the Aarhus Convention.
- 7.27. I note that as part of the scheme development stage, various non-statutory public consultation processes were undertaken. These processes are in excess of the requirements of the Aarhus Convention, whose obligations are already enshrined in Irish legislation as outlined above.
- 7.28. It is stated by the applicant that a total of three rounds of non-statutory public consultation were undertaken and every effort was made by the NTA to facilitate public participation and engagement during government restrictions relating to the Covid-19 pandemic. The first phase related to the Emerging Preferred Route (EPR) which ran from 14 November 2018 to 29 March 2019. The second and third phases related to the Preferred Route Option (PRO) and ran from 4 March 2020 to 17 April 2020 and 4 November 2020 to 16 December 2020 respectively (where online and virtual elements were developed to assist the public in viewing the proposals in the context of Covid 19).

- 7.29. I note that the applicants state that further and as an additional effort to facilitate public participation, the NTA sent email correspondence to 1,804 Community Forum Members (including 321 Public Representatives) on 1 July 2022 informing them directly of the submission of the application for development consent to An Bord Pleanála in respect of the Blanchardstown Scheme and notifying them of the opportunity to participate in the statutory public consultation process.
- 7.30. Concerns have also been raised in relation to the level of clarity provided within the documents in relation to the description of the proposed works. I have reviewed the documentation, plans and particulars submitted with the application in detail and note that the documents provided leave no ambiguity to the specifics of the proposed scheme extents in terms of its route, design, implementation and all mitigation measures proposed.
- 7.31. Thus, having regard to the documentation submitted in terms of public notices, advertisement and details of non-statutory consultations and engagement with third parties, I am satisfied that the applicant has clearly engaged with the community and all third parties and has amended the scheme accordingly where it has been feasible to do so in response to the concerns raised. Based on the foregoing I am satisfied that there has been continued meaningful engagement with the public and other third parties in relation to the proposed scheme.

**Project Design - Provision for buses, Bus Gate, traffic re-distribution, provision for cyclists and pedestrians**

- 7.32. The overall objective of the scheme design is to provide improved, attractive and safe sustainable transport infrastructure from the city at Ellis Quay to Blanchardstown.
- 7.33. It is important to note at the outset that whilst the applicant refers to the Design Manual for Urban Roads and Streets, 2019. The applicant also refers to a design document, called the Preliminary Design Guidance Booklet (PDGB) which has been developed as a tool for the design of the BusConnects scheme across the city. Whilst this is useful reference for the design justification of the proposed route, I note that the design of the proposed route largely complies with the requirements of DMURS. Any non-compliance with DMURS in terms of lane widths or design will be examined in detail under the relevant heading below.

7.34. It is also important to note that the Cycle Design Manual 2023 has been issued since the submission of this application and I have had regard to this manual in the assessment of the proposed scheme.

7.35. For the purpose of detailing the features of the proposed scheme and as outlined within the development description above, the applicant has firstly divided the scheme into the following five sections:

- Section 1: N3 Blanchardstown Junction to Snugborough Road:
- Section 2: Snugborough Road to N3 / M50 Junction;
- Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction:
- Section 4: Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction:
- Section 5: Navan Road / Old Cabra Road Junction to Ellis Quay

7.36. In terms of the current baseline conditions, please refer to the traffic and transport section of the EIAR in section 9 of this report hereunder. I will endeavour to describe the proposed changes within each section as follows, it must be noted that pavement upgrade works, widening and resurfacing of roads, footpaths, cycle tracks and kerbs will occur along the entirety of the route and is relevant to all sections hereunder, as is the introduction of new signage, street furniture and public realm improvements.

Section 1 N3 Blanchardstown Junction to Snugborough Road:

7.37. The Proposed Scheme will commence at Junction 3 (Blanchardstown / Mulhuddart) eastbound off-slip from the N3. It is proposed to alter the existing off-slip road from the N3, from two general traffic lanes to one general traffic lane and one bus lane. At the junction of Blanchardstown Road North / Old Navan Road, it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge.

7.38. In the vicinity of the N3 overbridge, cycle tracks will be relocated alongside footpaths, which cross adjacent to pedestrian crossings at slip-roads to avoid conflict with vehicular traffic. After crossing the N3 overbridge, the Proposed Scheme will provide a westbound bus lane alongside a general traffic lane along Blanchardstown Road South towards the Blanchardstown Shopping Centre via the Blakestown Way junction.

Two eastbound general traffic lanes will also be provided along Blanchardstown Road South.

- 7.39. A cycle track will be provided along each side of Blanchardstown Road South. A new retaining wall will be required between the cycle track / footpath and the shopping centre, extending from the westbound bus stop to the N3 off slip junction and further south towards the Crowne Plaza hotel.
- 7.40. The existing small retaining wall and railing between Whitestown Grove and Blanchardstown Road South will be replaced due to a reduction in footpath levels. The new wall and railing will match existing.
- 7.41. A new bus layover 'layby' and driver welfare facility will be located north of the shopping centre on Blanchardstown Road South. A new access, in the form of a signalised junction, will be provided from Blanchardstown Road South into the northern car park at Blanchardstown Shopping Centre. The Blanchardstown Road South / Blakestown Way junction will be converted from a roundabout to a signal controlled junction. The proposals for the road linking the Blanchardstown Road South / Blakestown Way junction to the western junction of the Bus Interchange include a bus lane and general traffic lane in each direction, with an additional left turn filter lane into the shopping centre.
- 7.42. A single cycle track along the eastern side of this road becomes a two-way cycle track on the approach to the shopping centre. The area adjacent to the western junction of the Bus Interchange will facilitate 35 bicycle stands.
- 7.43. The existing roundabouts in the vicinity of the Blanchardstown Shopping Centre will be converted to signalised junctions. Within the Blanchardstown Shopping Centre site, the existing bus laydown will be upgraded to a more formal Bus Interchange with improved passenger waiting facilities. The new Bus Interchange will include six bays for boarding / alighting and an additional seven alighting bays for buses.
- 7.44. The existing roundabout junction adjacent to the Liberty Insurance Building on the L3020 will be modified to a fully signalised crossroads junction, allowing for bus lanes in both directions each side of this junction. The road between the existing junction and the tie-in with the Snugborough Interchange Upgrade scheme will be widened to accommodate improved cycling, pedestrian and bus stop facilities.

7.45. A new bus layby (for inter-urban buses) will be provided on the westbound carriageway on the L3020, which will require a short section of retaining wall to be constructed to the rear of the proposed cycle track at this location. Following this Section, it is intended to route the bus lane through the Snugborough Road junction.

#### Section 2: Snugborough Road to N3 / M50 Junction;

7.46. This Section of the Proposed Scheme will commence at the tie-in with the Snugborough Junction Upgrade scheme on the N3 citybound slip-road. A bus lane will be provided along the N3 Snugborough Road junction onslip and off-slip ramps. The Proposed Scheme will provide bus lanes on the N3 corridor in both directions which will require the widening of the BR01 River Tolka Bridge beneath the N3 off-slip and also BR02 Mill Road Bridge.

7.47. On the N3 inbound carriageway, the Proposed Scheme will relocate the overhead variable messaging sign, modify an existing overhead sign gantry, provide a new overhead sign gantry and remove an existing overhead sign gantry.

7.48. Additional inbound and outbound bus stops will be provided on the N3 with pedestrian access to and from Mill Road. Access from Mill Road to the new bus stops will be via pedestrian ramps and steps.

7.49. Existing noise barriers will be relocated along the outbound carriageway at the back of the verge. The speed limit will be 60km/h for the inbound and outbound bus lane of the N3 carriageway section. The inbound bus lane will be directed onto the Connolly Hospital off-slip road and onto the N3 Navan Road. The Proposed Scheme will provide a bus lane in both the eastbound and westbound directions on the gyratory over the M50 (Junction 6).

#### Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction

7.50. It is intended to construct a new section of inbound bus lane between the eastern side of the N3/M50 gyratory and the Auburn Avenue junction. New bus stops will be provided immediately to the east of Auburn Avenue junction with the R147 Navan Road, along both the inbound and outbound carriageways. A short retaining wall will be provided to the rear of the outbound bus stop.

7.51. A new bus lane will operate along the existing inner lane of the inbound and outbound R147 Navan Road. The bus lane will terminate on the inbound carriageway between Morgan Place and the Navan Parkway off-slip junction which will allow left turning

vehicles to enter the nearside lane to leave the main carriageway. At the Navan Road Parkway junction, buses will be routed off the mainline and along the on and off slip roads (widened to carry bus lanes) to the junction overbridge. As part of measures to improve road safety, the inbound carriageway cross-section will be reduced from four general traffic lanes and a bus lane to two general traffic lanes and a bus lane before the existing pedestrian crossing west of Morgan Place. This will reduce potential conflict in vehicle movements, between Morgan Place and the Navan Parkway off-slip junction.

- 7.52. Commensurate with the suburban nature of Navan Road between Auburn Avenue and Phoenix Park Avenue junctions, a consistent 60kph speed limit will be implemented. East of Phoenix Park Avenue junction, Navan Road enters an urbanised environment (including pedestrian crossings), a 50km/h speed limit will be implemented.
- 7.53. New bus stop lay-bys for inter-urban buses will be provided on both the inbound and outbound Navan Parkway off-slip ramps, with a new inline bus stop located on the inbound on-slip ramp.
- 7.54. The Proposed Scheme will provide Quiet Street Treatment for cyclists on Castleknock Manor to integrate with secondary route 4A of the Greater Dublin Area (GDA) Cycle Network Plan. The Auburn Avenue / Castleknock Manor roundabout will be modified to provide enhanced pedestrian and cyclist crossing facilities. Between Castleknock Manor and Ashtown Road junction, a two-way cycle track along the outer edge of the westbound (outbound) carriageway will be provided.
- 7.55. At the Ashtown Road junction, the two-way cycle track will be terminated west of the junction, and will transition to a one-way cycle track on each side of the Navan Road carriageway east of the junction.
- 7.56. The two left-in / left-out junctions on opposite sides of Navan Road at Phoenix Park Avenue will be amended to operate as a staggered signal-controlled junction, which will allow left and right turns out of the side roads, left turns into the side roads and right-turns from the west into Phoenix Park Avenue. The central median between Phoenix Park Avenue junction and Ashtown Road junction will be removed to provide additional space for footpath and cyclist facilities and landscaped verges.
- 7.57. At the Navan Road / Ashtown Road junction, the existing roundabout will be modified to a signal-controlled crossroads, with separate pedestrian and cyclist crossings. The

Blackhorse Avenue / Ashtown Gate Road junction, located to the south of the Ashtown Road junction, will be signalised.

Section 4: Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction

7.58. From Ashtown Road junction to the Navan Road / Old Cabra Road junction the Proposed Scheme will generally consist of a bus lane and general traffic lane in each direction, with one-way cycle tracks alongside the proposed inbound and outbound bus lanes.

7.59. Junction layouts will be amended to include the removal of the right turn filter lane from Navan Road (westbound) into Kempton Avenue and Ashtown Grove.

Section 5: Navan Road / Old Cabra Road Junction to Ellis Quay

7.60. The Proposed Scheme will limit the use of Old Cabra Road to local access traffic, buses, taxis and cyclists as follows:

- No through traffic in the southbound direction at the northern end of Old Cabra Road (at its junction with Navan Road), except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road;
- No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus Gate.
- On Old Cabra Road, the extent of the outbound bus lane will be limited to an approximate 110m section just south of the Navan Road junction. Glenbeigh Road / Old Cabra Road junction will become a signal-controlled junction, with the introduction of toucan crossings on the Old Cabra Road.
- The Proposed Scheme will provide two one-way cycle tracks on each side of Old Cabra Road. The traffic lanes, bicycle infrastructure and footpaths will be accommodated within the existing road bridge width over the Heuston Station / Connolly Station railway line.

- To provide an alternative route for general traffic to and from the City Centre (along Cabra Road, North Circular Road, Infirmary Road and Conyngham Road), the Cabra Road / North Circular Road junction will be modified to allow right turns from Cabra Road to North Circular Road and left turns from North Circular Road onto Cabra Road.
- On Prussia Street, between North Circular Road and the entrance to the Park Shopping Centre, the Proposed Scheme will provide:
  - One southbound general traffic lane;
  - One northbound 'straight-ahead only' lane for local traffic, taxis and buses travelling to Old Cabra Road; and
  - One left turn lane from Prussia Street to North Circular Road;
  - Right turn movement from Prussia Street to North Circular Road will be removed.
- The junction of Prussia Street and North Circular Road will be upgraded to a signalised junction to provide separate crossing facilities for cyclists and pedestrians.
- Along Prussia Street, a traffic lane will be provided in both directions, carrying buses and local traffic only. St Joseph's Road will be modified to include a one-way section at its eastern end (i.e. one-way in an eastbound direction).
- A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists merge with general traffic just north of Park Shopping Centre.
- In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph's Road
- At the junction of Manor Street / Prussia Street with Aughrim Street, the Proposed Scheme will provide the following:
  - In the northbound direction, a Bus Gate will be located on Prussia Street just north of Aughrim Street junction, such that all northbound general traffic will be required to turn left onto Aughrim Street;
  - In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction – and any general traffic

travelling southbound on Prussia Street at this location will be required to turn right onto Aughrim Street;

- The loading bay outside Kavanagh's Public house will be retained.
- The Manor Street / Prussia Street / Aughrim Street junction will be modified to include a signal-controlled cycle crossing, along with urban realm improvements at this junction. The junction layout will include raised carriageway paving (i.e. raised table) to assist pedestrians crossing. The junction will include a southbound Bus Gate on Aughrim Street, preventing any general traffic from travelling from Aughrim Street onto Manor Street.
- South of the Aughrim Street junction with Manor Street and Prussia Street, traffic signal controls will be included at the Manor Street / Kirwan Street / Manor Place staggered junction. The signal-controlled junction also includes a pedestrian crossing of Manor Street. Movements out of Kirwan Street will be restricted to left turn only, which will remain one-way westbound as at present. At the junction with Manor Street, Manor Place will be altered to a one-way street (i.e. one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic.
- On Manor Street and Stoneybatter, the Proposed Scheme will provide two general traffic lanes and a cycle track in both directions to the junction with Brunswick Street North. The Proposed Scheme will provide protected parking bays on both sides of the road, and two loading bays.
- In the northbound direction on Blackhall Place, the Proposed Scheme will provide a bus lane and a single general traffic lane, as far as the junction with King Street North. Northbound general traffic wishing to progress onto Manor Street will turn right onto King Street North (which will remain one-way eastbound), and then turn left onto George's Lane to travel westbound along Brunswick Street North.
- The Proposed Scheme will include signal-controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction.
- The Proposed Scheme will provide a cycle track in each direction along Brunswick Street North.

- The Proposed Scheme will allow for general traffic exiting Arbour Hill to turn right only at the Stoneybatter junction. General traffic into Arbour Hill will be from Manor Street direction or Brunswick Street North only.
- A southbound general traffic lane will be provided along Stoneybatter between Brunswick Street North and King Street North, with general traffic being required to turn left into King Street North as a result of a southbound Bus Gate at Blackhall Place / King Street North junction.
- On Blackhall Place between Blackhall Street and Arran Quay, the carriageway arrangement will consist of a bus lane and general traffic lane in each direction.
- On Blackhall Street, the road layout will be revised to include one lane for general traffic, a two-way cycle track, and angled parking. George's Lane will have one northbound general traffic lane, with proposed new signal controls at the junction of Grangegorman Street Lower and Brunswick Street North.
- Westbound general traffic from the City Centre on the eastern section of King Street North (east of George's Lane) will be restricted to left turns only, into Queen Street. On Queen Street, the Proposed Scheme will provide two southbound general traffic lanes.
- From King Street North, the layout will reduce to one southbound general traffic lane from Blackhall Street to Ellis Quay / Arran Quay. The Proposed Scheme will provide a two-way cycle track on the eastern side of Queen Street from King Street North to Ellis Quay / Arran Quay.
- A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace and on Charleville Road at its junction with North Circular Road.
- No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road.
- A short one-way southbound section is also proposed at the northern end of Cowper Street, with Aughtim Place becoming one-way southbound. There is also a short one-way westbound section at the western end of Swilly Road.

7.61. The Construction Phase for the Proposed Scheme is anticipated to take approximately 24 months to complete. It will be constructed based on individual sectional completions that will individually have shorter durations typically ranging between 1 to 13 months

#### Provision for Buses

7.62. Prior to the examination of the merits of the proposed scheme in terms of bus infrastructure provision. I considered it necessary for the benefit of the Board, to clearly describe the features and bus infrastructure proposed.

7.63. Three types of bus stop are proposed along the route as follows:

- **Island Bus Stops** – bus stops whereby cycle lanes pass behind the bus stop separating the bus stop area from the footpath. To prevent conflict with pedestrians, pedestrian priority crossings accompanied by on-call signals will be provided, with narrowing of the cycle track from 2.0m to 1.5m to prevent cyclists overtaking through the bus stop. (see image 4.9 & 4.10 Chapter 4 of the EIAR)
- **Shared Bus Stop Landing Zone** - Where space constraints do not allow for an island bus stop, an option consisting of a shared bus stop landing zone is proposed. It is designed to reduce conflict between cyclists and stopping buses by ramping cyclists up to footpath level where they continue through the stop. The cycle track will also be narrowed when level to the footpath and tactile paving provided to prevent pedestrian/cyclist conflict. (See image 4.11 as above).
- **Layby Bus Stop** – Bus stops which are indented off the bus lane allowing other buses to pass. These are used for buses with longer dwell times. This will allow for unimpeded traffic flow at this location. (see image 4.12 as above).
- **In line Bus Stop** - Where there are no cycle tracks provided, Inline Bus Stops will be used, where the users departing the bus will exit straight onto the footway.

7.64. **Bus priority measures** can be achieved by – dedicated lanes, bringing bus lane to junction stop and this means in some circumstances that left-turning traffic cannot use the bus lane at junctions and instead will be provided with a dedicated left-turn traffic

signal phase for the turn movement off the general traffic lane or will be provided with a separate left-turning lane.

7.65. **Signal Controlled Priority** - An alternative measure for achieving bus priority at locations where the provision of bus lanes is not possible is the use of Signal Control Priority (SCP). SCP facilitates bus priority by using traffic signals to give buses priority ahead of general traffic on sections of a route with significant physical constraints or pinch-points impacting on the provision of a bus lane. It works through the use of traffic signal controls (typically at junctions) where the bus lane and general traffic lane must merge ahead and share the road space for a short distance until the bus lane recommences downstream. The general traffic will be stopped at the signal to allow the bus pass through the narrow section first.

7.66. SCP will be provided at the Stoneybatter / Brunswick St North junction (Outbound) to provide priority for buses in the Stoneybatter Village area, while providing wider footpaths, segregated cycle tracks and reducing overall general traffic in this area.

**Bus Gates** - A Bus Gate is a sign-posted short length of stand-alone bus lane. This short length of road is restricted exclusively to buses, taxis, cyclists and emergency vehicles. It facilitates bus priority by removing general through-traffic along the overall road where the Bus Gate is located. General traffic is directed by signage to divert towards other roads before it arrives at the Bus Gate. Bus Gates will be in place for specified hours during the day. Bus Gates are proposed along the Proposed Scheme at the following locations:

- Navan Road at junction with Ratoath Road / Cabra Road / Old Cabra Road (inbound);
- Railway overbridge at Old Cabra Road (outbound);
- Manor St at junction with Prussia St and Aughrim St (inbound and outbound);
- Aughrim Street at junction with Prussia St and Manor St (inbound); •
- Blackhall Place at junction with King Street North (outbound); and
- Stoneybatter at junction with King Street North (inbound) (currently in place).

Concerns raised in relation to Bus infrastructure and stop locations

- 7.67. It is clear from the submissions received that there are a number of concerns in relation to bus infrastructure, such as accessibility of bus stops for the visually and mobility impaired, wheelchair users and others with various disabilities. Conflict between cyclist and pedestrians at bus stops is also raised as a concern and the potential for impacts to accessibility of entrances.
- 7.68. In relation to the accessibility of bus stops for the mobility impaired I note that the applicant states that bus stops have been designed in an accessible manner for this group. The applicant contends within the EIAR that A Disability Audit of the existing environment and proposed draft preliminary design for the corridor was undertaken.
- 7.69. The Audit provided a description of the key accessibility features and potential barriers to disabled people based on the Universal Design standards of good practice. Examples of design solutions for the mobility impaired is the use of 60mm set down kerbs which identify a change in pavement use and is legible to guide dogs. The use of bus islands and including signal call button for crossing of cycle tracks will manage interactions with cyclists and pedestrians. I note that the applicant has engaged in consultation with Irish disability groups and has incorporated their advice within the design of the scheme, further evidence of this will be discussed in relation to junction design hereunder.
- 7.70. Bus islands are considered to reduce the potential for conflict between pedestrians, cyclists and stopping buses by deflecting cyclists behind the bus stop, thus creating an island area for boarding and alighting passengers. On approach to the bus stop island the applicant states that the cycle track is intentionally narrowed with yellow bar markings also used to promote a low-speed single file cycling arrangement on approach to the bus stop. A 1 in 1.5 typical cycle track deflection is implemented on the approach to the island to reduce speeds for cyclists on approach to the controlled pedestrian crossing point on the island. To address the potential pedestrian/cyclist conflict, a pedestrian priority crossing point is provided for pedestrians accessing the bus stop island area. At these locations a 'nested Pelican' sequence similar to what has been provided on the Grand Canal Cycle Route will be introduced so that visually impaired or partially sighted pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red.

- 7.71. In addition to the foregoing a 1:20 ramp is provided on the cycle track to raise the cycle track to the level of the footpath/island area onto a wide crossing. Suitable tactile paving is also provided at the crossing point in addition to a series of LED warning studs provided at the crossing location which are actuated by bus detector loops in the bus lane.
- 7.72. Having reviewed the detailed design of the proposed island bus stop and the concerns raised within the submissions, I am satisfied that the applicant has had due regard to the requirements of the mobility impaired and has designed this infrastructure accordingly to meet the needs of not only the mobility impaired but also the visually impaired.
- 7.73. I note that there are no submissions from representative groups for either the visually impaired or mobility impaired to the scheme, and I further note that extensive consultations with such groups has formed part of the design process for the scheme.
- 7.74. Dublin City Council within their submission also refer to the potential conflict between cyclists and pedestrians at bus stops and suggest that the scheme includes measures to slow cyclists down. Measures in this regard in relation to island bus stops has been adequately dealt with above. In relation to other bus stop types such as Shared Bus Stop Landing Zone, I note that the applicant proposes to narrow cycle lanes to 1 metre and to raise the cycle lane by a 1:20 gradient to the same level as the footpath on approach to the stop. Tactile paving will be used at these locations to differentiate between uses.
- 7.75. It is important to note at this juncture that the proposed cycle lane width reductions at these locations whilst below that required within DMURS have been adequately justified in the interest of pedestrian safety. It is reasonable to expect instances whereby the optimal design cannot be achieved given that the proposed scheme is to be retrofitted into an existing urban fabric. The applicant within the documentation provides adequate justification where such reductions occur and has responded to these specific concerns within their response to the submissions as summarised above. Based on the information submitted and the context of the site I am satisfied that both the reduction in cycle lane width with behind the bus island are acceptable and adequately justified in the context of the overall scheme.
- 7.76. The following are bus stops of particular concern to third parties:

- Parkway Outbound – noting that approximately 1000 school children will attend the future Edmund Rice School
- Ashtown Grove/ Daughters of Charity – Daughters of charity provides services to persons with intellectual and physical disabilities
- Our Lady Help of Christians Church – approximately 1700 school children attending surrounding schools
- Boys and Girls Primary School – approximately 1000 pupils
- St Dominic’s College – approximately 800 pupils 6. Nephin Road St. Declan’s College – approximately 650 pupils

7.77. In relation to the capacity concerns I refer the Board to section 4.6.4.5 of the EIAR in which it is stated that ‘The TFL Bus Stop Design Guidance states that bus stop capacity is a function of bus length, service frequency, the number of serving routes and their average dwell time. The BusConnects Dublin Corridors will generally carry between 15 to 20 buses per hour at peak times, which equates to a bus every 3 minutes. Assuming a maximum dwell time of 1 minute it could be assumed that one bus stop will be sufficient in most cases’. It is clear from the information submitted that the applicants have adequately considered and examined the capacity of bus stops and have designed the proposed scheme accordingly. Notwithstanding that bus stop capacities and number are not a matter for the Board I am satisfied that the applicant has carried out a robust assessment of the infrastructure proposed and has provided a clear justification for same. Other issues raised in relation to bus stops relate to the visual impact of proposed stops within particular areas. Such matters are examined within the relevant sections of the EIAR hereunder.

Bus Gate & Traffic redistribution issues

7.78. I note from the submissions received that there is concern in relation to the proposed bus gate and the knock-on effect of traffic redistribution within the wider area of the proposed scheme. The submissions suggest that motorists will use surrounding roads to take short cuts which are not suitable for increased traffic and will impact on the safety of vulnerable road users. It is submitted that the proposed measures are unnecessary and disproportionate, noting traffic congestion on Old Cabra Road is confined to morning peak time. A relaxation of the bus gate operational hours is

therefore sought as a means to preventing the redistribution of traffic to the surrounding road network.

- 7.79. The Board should also note that concerns have been raised by the existing petrol station on the Old Cabra Road relating to the impact of the proposed changes on the business viability. Tesco have also raised concerns in relation to the viability of their store on Prussia Street and their ability to service the store with deliveries. Such concerns are echoed within the Shopping centre submission and are considered separately within this report below.
- 7.80. General concerns relate to the redistribution of traffic, the accessibility of their homes and businesses, particularly along Prussia Street and Fingal Terrace. There is a concern that Prussia Street, Manor Street and Stoneybatter will become a bus corridor pushing business out of the area.
- 7.81. I have reviewed the applicant's documentation in this regard and the modelling carried out, the Board should note that all surrounding roads which are expected to be affected by such changes in distribution have been modelled and are outlined within the traffic and transportation section of the EIAR as outlined and examined within Section 9 of this report. In general I note that modelling suggests that over 50% of the affected roads will experience a decrease in traffic and whilst the remaining roads will experience increases, these will not be of any notable significance.
- 7.82. In response to the concerns raised I draw the Board's attention to section 2.3.3.1 and 2.4.3.1 of the NTA's response to submissions in which the applicant addresses the concerns raised.
- 7.83. At the outset it is stated that a reduction in general traffic at the junction adjacent to St Peter's Church in the AM and PM peak hours is predicted, similarly on the approach to the Phibsborough Road junction. Due to a reduction in forecasted traffic flows on Cabra Road and North Circular Road, these routes will offer a reasonable alternative journey time thus providing a more direct and quicker option to commuters.
- 7.84. In response to the concerns raised by the petrol station on the Old Cabra Road I note access will be available via Glenbeigh Road. Access to Lidl will also be available via Glenbeigh Road or northbound on Old Cabra Road. However I acknowledge in relation to the petrol station that a significant reduction in through traffic would undoubtedly have an impact on the number of customers to the services. The Board should note

that this has also be recognised by the NTA. However, given the gains in terms of benefits to the wider community and the overall accessibility into and out of the city as a result of the proposed scheme, on balance I consider the delivery of this active sustainable travel infrastructure to be acceptable in this regard. The station can still be accessed and maintain operations albeit not as conveniently as at present.

7.85. The Board should note in relation to the proposed 24hr bus gate at Old Cabra Road that 'existing traffic flow levels on the corridor do not show a significant reduction in the middle of the day (relative to peak hours), and hence bus gate operation throughout the day is necessary to provide reliable bus journey times for all services'. The applicant further states that whilst traffic levels reduce significantly in the overnight period, 24-hour bus gates are preferred in order to provide road users with a road layout and network which is consistent at all times – and hence can be easily understood and safely used by car drivers, pedestrians and cyclists.

7.86. Given the level of traffic currently utilising this route it is reasonable to propose such measures to ensure that the proposed route operates efficiently and does not create traffic issues which could have effects further down or up the line or gives rise to confusion in road users.

#### Blackhorse Avenue

7.87. In relation to concerns raised regarding Blackhorse Avenue it is clarified that the Proposed Scheme does not include any proposals to divert traffic from Prussia Street onto Blackhorse Avenue and onwards to Navan Road via Nephin Road, traffic is directed to Navan Road via North Circular Road and Cabra Road, with the introduction of a new left turn at St Peter's Church.

7.88. However, given an increase on a section midway along Blackhorse Avenue of 219 PCU's, the applicant undertook a further detailed capacity analysis on the associated junctions along the affected links. The result of this analysis at various Blackhorse Avenue junctions was not significant. Traffic redistribution within this area is therefore acceptable.

#### Prussia Street

7.89. Impact to Prussia Street in terms of traffic as a result of the Bus Gate are positive with a reduction of 856 vehicles per hour in the AM and 926 in the PM scenario. In relation to the issues raised pertaining to this street, the Board should note the justification for

the installation of a bus gate outlined above which will not be repeated. In relation to accessibility and viability of businesses in terms of footfall I note that the applicant has examined people movement within the EIAR and note positive increases and improvements in this regard. Consequently, it is contended by the applicant that such an increase in people movement would have a positive impact on businesses. I noted at the time of inspection that local coffee shops in this area were catering for large number of patrons and it is reasonable to expect that improvements to public realm in this location would have a positive impact to such businesses, enticing people to stay in the locality and utilise the services available.

- 7.90. In relation to car accessibility to private dwellings it should be noted that access to private residences will be maintained. I note in relation to access to businesses in the area of the bus gate - Manor Street and Prussia Street it is stated that it will still be maintained via Manor Place, Kirwan Street, and northbound from Blackhall Place, via King St North, George's Lane and Brunswick St North. It is acknowledged by the applicant that passing trade would be reduced for these businesses but not completely removed. As private vehicle access to these businesses will be maintained, there is not expected to be an impact on the ability of the business to operate.
- 7.91. I note that the overall magnitude of impacts to the community area of Aughrim Street on access to commercial businesses and employment locations for private vehicles is Negative, Not Significant and Long Term during the operational phase. Whilst I acknowledge that such impacts are not welcomed by business owners, in the context of the overall benefits of the proposed scheme which will provide a sustainable and active travel facility throughout the city in combination with all other BusConnects routes, I considered on balance, that these impacts, whilst undesirable, are not of such a significant level as to warrant a refusal of the proposed scheme.
- 7.92. The Board should note in this regard that the applicant has referred to case studies within the 'The Economic Impact of the Core Bus Corridors' is included in Appendix A10.2. in which it was noted that business owners overestimated the number of people arriving by car and in doing so did not experience the level of negative impacts expected.
- 7.93. Having regard to the accessibility provisions for businesses and residents I am satisfied that businesses can operate in terms of deliveries and access by employees

by car and I am cognisant of the positive impacts that public realm and the creation of people centred streets can have on the viability of businesses. On balance therefore, I consider the proposed scheme to be acceptable in terms of the proposed bus gates and am satisfied that the knock-on effects of re-distributed traffic have been robustly and adequately assessed within the documentation and the EIAR submitted by the applicant and am satisfied that significant impacts to Prussia Street, Manor Street and the surrounding area will not arise in this regard.

- 7.94. Further consideration of concerns raised within the third party submissions in relation to re-distributed traffic in the vicinity of the proposed scheme is examined hereunder.

#### Baggott Road

- 7.95. This particular route will also experience a decrease in vehicles per hour, with the proposed scheme having a slight positive impact on the road.

#### Nephin Road

- 7.96. Concerns have been raised in relation to the capacity of Nephin Road to accommodate additional traffic. The applicant has examined this road within the modelling of the proposed scheme, and I note that the increase in traffic is below the 100 vehicles per hour threshold and is considered to be a very low increase in traffic. Given the urban context of the proposed scheme and the significant volumes of traffic traversing the city I am satisfied that impacts to Nephin Road would not be significant.

#### Skreen Road

- 7.97. The applicant states that the transport assessment has indicated that on Skreen Road there would be a decrease of 149 vehicles per hour in the AM peak hour and an increase of 147 vehicles per hour in the PM peak following the implementation of the proposed scheme. Given that the current situation is not expected to be altered significantly I am satisfied that the proposed scheme will not result in significant negative impacts to the carrying capacity of this road, or indeed the traffic levels perceived and experienced by residents.

#### Cabra Road, North Circular Road and Phibsborough

- 7.98. As mentioned above a reduction in general traffic flow along Cabra Road and North Circular Road at AM and PM peak hour respectively is expected. It is also forecast that there will be a reduction in general traffic at the junction adjacent to St Peter's Church

in the AM and PM peak hours, and on the approach to the Phibsborough Road junction, as a result of the Proposed Scheme. Further increases in bus usage is expected to further reduce traffic on this section of the route and surrounding road network into the future.

7.99. Whilst no specific objections were made in relation to the phoenix park, the applicant has considered the road network within and around the park within the context of the scheme. The Board should note that whilst minor increases in traffic are expected in the PM scenario, decreases are expected in the AM scenario, with no significant impacts predicted overall.

7.100. In relation to both Glenbeigh Road, whereby concerns were raised in relation to traffic and Croagh Patrick Road, I note that the proposed scheme will result in reductions in traffic along both of these roads, giving rise to positive impacts. The third party request for traffic calming on the Glenbeigh road, which incidentally currently contains speed ramps, is therefore not warranted or required in this instance. The Board should note, as outlined above, it is proposed to provide a signalised crossing at the Glenbeigh/Old Cabra road junction in order to provide improved safer active travel facilities at this location.

7.101. The Board should note at this juncture that concerns raised in relation to noise, pollution and vibration along the aforementioned roads has been considered within the relevant sections of the EIAR hereunder and will not be repeated. Nonetheless it is important to state that no significant negative impacts are expected in this regard in relation to the proposed scheme and the redistribution of traffic across the surrounding road network.

7.102. Overall, whilst I acknowledge that there will be additional traffic on a limited number of roads, I am satisfied that increases are not significant and such routes are of adequate capacity in terms of junction capacity to cater for the small number of additional traffic movements proposed.

7.103. I am satisfied that the applicant has robustly examined the potential for impacts to arise in relation to the surrounding road network and that such changes will not give rise to any significant effects.

7.104. Furthermore, I consider it is reasonable to expect a reduction in general traffic as a result of the provision of a high frequency reliable bus service along the route which

can be conveniently accessed by residents in the surrounding area, and which provides a more efficient and attractive mode of travel to the private car. Having regard to the foregoing, I am also satisfied that additional traffic will not conflict with the safe operation of schools in the vicinity, as raised within a number of third-party submissions. It is also clear from the information provided that less traffic is expected on many routes and as such the general traffic environment will improve for schools in the area.

#### Impact on King Street North, George's Lane, Brunswick Street North and Kirwan Street

7.105. Third parties are concerned about the complex diversion system at the lower end of Stoneybatter through King North Street, George's Lane and along Brunswick Street North/Kirwan Street. A number of issues have been raised in relation to access for businesses and the need for the changes. The board should note that restrictions in turning directions relate to the proposed bus gate at Prussia Street and the bus gate at Blackhall Place.

7.106. It is stated that the proposed outbound bus gate at Blackhall Place / King Street North junction will discourage outbound general traffic from using Manor Street as a through-route. In addition, the proposed signal-controlled outbound bus priority at Stoneybatter / Brunswick Street North junction will provide priority for buses in the Stoneybatter village area, while providing wider footpaths, cycle tracks and reducing overall general traffic in this area.

7.107. The applicant has considered alternatives to these scenarios however the proposed arrangement preforms best in achieving the aims and objectives of the proposed scheme. Justification for the proposed bus gates along this section of the route are outlined above and relate to the persistent heavy volume of traffic over the daytime hours and the provision of certainty and safety for road users. Reductions in traffic along King Street are expected as a result of the proposed scheme which I consider to be an improvement over the current situation at this location. Any disruption to accessibility of premises will be dealt with on a case by case basis as is usual practice in any urban construction project and I am satisfied that access will to such premises will not be prohibited by the operation of the proposed scheme.

7.108. Whilst examined within the Section 9 of this report hereunder, the Board should note that traffic flows on Kirwan Street will not exceed 100 PCU's, given the low level of

increase I am satisfied that the proposed scheme would not have any undue significant impacts to the residents of this street.

#### Aughrim Street

7.109. Concerns are raised within the third-party submissions in relation to the use of Aughrim street by displaced traffic. I note the applicant's response in this regard in which it is stated that the proposed bus gates are expected to discourage outbound traffic for using Manor Street as will the no right turn from Kirwan Street to Manor Street. As outlined in Section 9 below, modelling suggests that Aughrim Street will experience a reduction in traffic of 235 and 236 PUC's during the AM and PM scenario.

7.110. An alternative route for general traffic from the City Centre is outlined along Infirmary Road and North Circular Road, the Cabra Road (Dalymount) / North Circular Road junction which will be modified to allow left turns from North Circular Road onto Cabra Road (Dalymount).

7.111. Having regard to the information provide it is clear that impacts to Aughrim Street are not likely to arise given that the street will experience a reduction in traffic volumes as a result of the proposed scheme.

#### Impact on St Joseph's Road, Oxmantown Road, Manor Place, Cowper Street, Aughrim Place, Arbour Hill, Montpellier Hill, Ard Righ Road and Infirmary Road

7.112. Concerns are raised within the third party submissions that the one-way proposal on St Joseph's Road will increase traffic travelling from Aughrim Street to Prussia Street and Park Shopping Centre. Similar to the foregoing roads I note that the forecast flows indicate that the proposed arrangement of operating a one-way section at the eastern end of St Joseph's Road (towards Prussia Street) will limit any flow increases to very low levels. The rest of St Joseph's Road will remain as a two-way street for local access. Impact are not expected to be significant.

#### Impact on Oxmantown Road, Manor Place, Cowper Street and Aughrim Place

7.113. Concerns are raised within the submissions that these routes will be negatively impacted by additional displaced traffic. Concerns are also raised about gaining vehicular access via Aughrim Place to the rear of properties 124 to 136 North Circular Road.

7.114. I refer the Board to the applicant's response within Section 2.4.3.5 of the NTA's response to submissions in which the following is stated, 'A no-left turn ban is proposed to prevent movement from North Circular Road onto Oxmantown Road. In addition, at the junction with Manor Street, Manor Place will be altered to a one-way street (i.e., one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic. These measures, in combination with proposals to make Cowper Street and Aughrim Place one-way westbound (at their junctions with Aughrim Street) and to make St Joseph's Road one-way eastbound at its junction with Prussia Street, will limit the use of Oxmantown Road as a through-route, while also maintaining access by car to and from local destinations'.

7.115. The forementioned measures will ensure that access remains for locals only and therefore prevent the use of these streets by displaced traffic. Changes to traffic volumes have been modelled for these roads and I am satisfied based on the limited increase in traffic, i.e. under and in the case of Oxmantown Road slightly over 100 PCU's, that no significant impacts will arise as a result of the proposed scheme.

7.116. In relation to access to the rear of 124 to 136 North Circular Road, the applicant has confirmed that this will remain unimpeded.

#### Impacts to Arbour Hill, Montpelier Hill, Ard Righ Road and Infirmary Road

7.117. Similar to the foregoing issues, third parties are concerned that the proposed scheme will give rise to impacts along the above roads as a result of displaced traffic. Issues raised also relate to proposed bus gates with a relaxation requested.

7.118. In response to the issues raised I note that increases in traffic volumes will be less than 100 PCU's. The applicant has proposed traffic management measures in the form of sections of one-way street and / or turn bans to minimise traffic impacts on roads adjacent to the proposed core bus corridor due to any rerouting of traffic.

7.119. Overall, having regard to the foregoing it is clear that there are significant concerns held by local residents and business owners in the area of the proposed scheme in relation to the impacts on their local road network and accessibility and how this will impact their business viability and quality of life. I have read all of the submissions in this regard and note the concerns raised. It is clear from the information submitted that impacts to residents and businesses alike will not be significant and in some instances the scheme will be an improvement over the current situation in terms of reducing

traffic flows. However, more importantly, the overall benefits to the wider community are extensive. The provision of improved public realm will entice people to use spaces differently and the provision of active travel facilities are well documented to have an overall positive impact on peoples health and wellbeing. I am satisfied therefore that the proposed changes to traffic direction and flows as outlined above are acceptable and are compliant with the overarching policy position as outlined above.

#### Impact to Annamoe Road

7.120. Submissions noted that proposed traffic management on Charleville Road and Annamoe Road will cause major disruption to residents trying to get to or come from the local roads, including North Circular Road and Prussia Street. Submissions questioned the need for the proposed changes at Monck Place, Annamoe Terrace and Charleville Road and stated they will cause increased journey times, detours around already overloaded roads and will impact businesses.

7.121. The applicant states in this regard that, offline traffic management measures have been introduced at Charleville Road, Annamoe Road, Monck Place and Phibsborough to minimise general traffic levels and it is noted that access to these side streets and adjacent roads will be available using the surrounding road network.

7.122. Residents who wish to travel to North Circular Road, and onwards to their chosen destination, will be able to do so via Cabra Road, with a proposed new right turn at St Peter's Church. The Proposed Scheme provides a balance between ensuring that the use of these side streets by through traffic is discouraged at all times, while also ensuring that access by car to local streets, schools and businesses is maintained, via the surrounding road network. The proposed traffic flow changes proposed throughout the scheme are proposed in the interest of maintain residential amenity levels for residents and preventing the creation of rat runs within the vicinity of the proposed scheme. Whilst I acknowledge the frustrations of the submissions in relation to Annamoe Road as referred to above, I am satisfied that such measures are necessary to achieve the overall objectives of the proposed scheme. The Board should note that traffic levels on Annamoe Road and terrace are due to decrease by 161 PCUs as a result of the proposed scheme.

### Provision for cyclists

- 7.123. One of the objectives for the Proposed Scheme is to enhance the potential for cycling by providing safe infrastructure, segregated from general traffic wherever practicable. The Proposed Scheme will provide 7.8km inbound and 8.1km outbound of segregated cycle facilities which is an increase from only 0.8km and 1.2km respectively in both directions. Overall, total cycle facilities (segregated and non-segregated) will be increased by 82% as part of the Proposed Scheme. The proportion of the corridor with segregated facilities (including quiet street treatment) will increase from 9% to 78%.
- 7.124. With regards to cycle parking, 108 spaces are currently provided, the Proposed Scheme will increase provision by 342% to a total of 478 spaces across the entire corridor.
- 7.125. At locations where roadway widths cannot accommodate cyclists alternative cycle route are proposed along quiet streets. One such route will be accommodated along Queen Street from Arran Quay to Brunswick Street North and from Castleknock Manor / Auburn Avenue, to integrate with secondary route 4A of the Greater Dublin Area (GDA) Cycle Network Plan to the north, along Old Navan Road..
- 7.126. For the benefit of the Board Quiet Streets are called so due to the low volume of only local general traffic users travelling at low speed and are deemed suitable and safe for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Treatment would involve appropriate advisory signage for both the general road users and cyclists.
- 7.127. In relation to the design of the proposed cycle lanes, I note that it is proposed to provide lane widths of 2 metres for the majority of the proposed scheme. I note from the National Cycle Manual that a lane width of 2 metres allows for overtaking within cycle lanes and is the most appropriate minimum width for commuter routes. Concerns are raised within the submissions regarding the width of cycle lanes. It is suggested that all lanes should be 2/2.25 metres in width and that green buffers should be provided between the bus lane and the cycle track.
- 7.128. Whilst it is proposed to provide cycle lanes of 2 metres wide for the majority of the scheme, the applicant contends that the proposed scheme is being delivered in a constrained urban environment and the delivery of a 2.0m+ wide cycle track may not always be practicable. As such, the cycle track widths have been reduced to typically

1.8m or 1.5m wide where the provision of 2.0m wide cycle tracks is not practicable. As previously mentioned, cycle lane widths will also be reduced on approach to bus stops in order to reduce cyclist speeds at these locations. At such locations cycle lanes will reduce to 1.5 metres on approach to Island Bus Stops and 1 metre at Shared Landing zone bus stops.

7.129. 1 metre is the minimum width achievable for a single cyclist. Such reductions are necessary to adequately reduce cycle speeds in order to protect pedestrians particularly those with mobility or visibility impairments. I am satisfied based on the foregoing that the applicant has adequately demonstrated a justified need for the reductions in widths proposed and note that the overall scheme provisions are a significant improvement in cycle infrastructure.

7.130. With regard to the provision of buffers, particularly along the R147, I note the applicant's response in which it is stated that the proposed scheme provides additional measures including continuous kerb segregated cycle tracks, traffic calming measures and lower speed limits throughout the Proposed Scheme in order to segregate cyclists from mainline traffic.

7.131. In relation to concerns regarding the lack of a dedicated cycle lane on Prussia Street, I note the applicant's response and acknowledge the width constraints at this location. However, I am satisfied that general traffic will be significantly reduced at this location as a result of the proposed bus gate, providing for a more suitable low speed environment (30km) for cyclists to share road space with buses and local traffic. Such situations are deemed appropriate with DMURS.

7.132. In relation to cycle parking outside Love Supreme I note that such matters are the responsibility of the local authority.

#### Junction Design for cyclist

7.133. Concerns are also raised within the submissions received in relation to the various junction designs proposed by the applicant. It is suggested within the submissions received that the Dutch style junction would be a preferable design to be implemented within the proposed scheme. The third parties are concerned that junction designs as proposed have the potential to create conflict with cyclists and lead to collisions with both pedestrians and vehicles.

7.134. As mentioned above the applicants have prepared a Junction Design Report which is contained in Appendix A6.3 in which each design approach is outlined, in addition typical junction designs are also fully outlined and described within the project guidance document referred to as the PDGB. The applicant contends that due to the inherently complex nature of mixed mode movements at junctions, the provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users.

7.135. It is important to note at the outset that the applicant clearly states that both the Dutch Design Guide 'Ontwerpwijzer Fietsverkeer' and the National Cycle Manual have been considered and have informed the design principles for the junctions proposed.

7.136. Given that no two junctions are the same within the proposed scheme the applicant contends that while layouts differ in terms of lanes, signals and crossings, the principles of safety and functionality contained within the NCM and DMURS are integral to each junction layout.

7.137. Four main junction layout designs are outlined within the PDGB. Each layout responds to constraints in terms of space, volume of turning vehicle traffic etc. For the benefit of the Board, and in the interest of clarity I will describe each of the proposed junction types hereunder. In addition, the Junction Design Report contained in Appendix L outlines the design for each junction along the scheme and the justification for same.

#### Junction Type 1

7.138. These junctions have dedicated bus lane, vehicle lane and cycle lane, no left turning lane is provided for general traffic. (see section 7.4.1 of PDGB for illustration)

7.139. To be used when volume of left-turning vehicles is greater than 100 PCUs (Passenger Car Unit) per hour, in an urban setting where no space is available for a dedicated left-turning lane/pocket. In this scenario the mainline cyclists proceed with the bus phases. The bus lane then gets red, allowing the general traffic lane to proceed. Cyclists can continue with general traffic if volumes are between 100-150PCUs, with left turners controlled by a flashing amber. If volumes are in excess of 150 PCUs per hour then the cyclists are also held on red whilst the general traffic proceeds on green. Cyclists are separated from traffic at corners of junctions by kerbs. This will ensure long vehicle take a wide turn and not collide with left turning cyclists. These junctions will be dominant in urban locations.

### Junction Type 2

7.140. These junctions will have a yellow box which crosses the bus lane approximately 30 metres from the stop line to allow left turning vehicles to enter a separate left turning lane. In this instance left turning cyclists are held and mainline cyclists proceed at the same time as buses. If volumes are less than 150PCUs mainline cyclists can proceed in tandem with left turning cyclists. Left turning cyclists will also be permitted to continue whilst side road traffic is moving but mainline cyclists will be held on red during these movements.

7.141. As with Junction type 1 cyclists from side road can proceed with mainline traffic and left turning cyclists will see a flashing amber light and get an early start to general traffic turning in the same direction. In the event that turning traffic from the side arms exceeds 150PCUs per hour the cyclist phase can be separated from the traffic phase.

### Junction Type 3

7.142. These junctions terminate the bus lanes a short distance from the junction (15-20 metres) to allow left turning general traffic move into the bus lane to turn left. Bus lanes commence directly after the junction on the opposite side. In this scenario mainline traffic including left turning traffic and buses proceed together but before they do mainline cyclists are given an 'early start' of approximately 5 seconds (minimum of 3 seconds) to minimise any conflict with left turners. When this early start is complete, the mainline cyclists can still proceed, assuming turning volumes are less than 150 PCUs per hour. Left-turners from the left-turn pocket are given a flashing amber arrow.

7.143. Bus lanes will be physically protected on the approach to Junction Type 3 which will ensure the performance of the bus lane isn't compromised by the left turners. Such protection measures will not impede residential entrances.

7.144. As with Junction Type 1 and 2, cyclists from the side roads can proceed with general traffic from the same arms, and the left turners from the side arms will be controlled by a flashing amber arrow and cyclists should receive an early start. As with the mainline, there may be circumstances where turning traffic from the side arms exceeds 150 PCUs per hour, in which case the cyclist phase from the side arm can be separated from the turning traffic phase.

### Junction Type 4

- 7.145. The main difference with this junction is that the pedestrian crossing has two signalised crossings, one to cross the cycle lane and one to cross the junction. Similar to junction 3 the bus lanes are terminated just short of the junction to allow left turners to turn left from a short left-turn pocket in front of the bus lane. Buses can continue straight ahead from this pocket where a receiving bus lane is proposed.
- 7.146. In this instance, mainline buses and left turners from the mainline proceed together. Depending on the prevailing site conditions, mainline cyclists can proceed with left-turners from the mainline (who are controlled with a flashing amber arrow) or cyclists can be held on red until it's time to share a full pedestrian 'wrap around' stage where all vehicular traffic is held and the green man is activated across all arms of the junction.
- 7.147. Left turning cyclists can bypass the junction while giving way to pedestrians crossing as well as cyclists already on the orbital cycle track.

#### Toucan Crossing

- 7.148. A toucan crossing is a signalised crossing whereby cyclists and pedestrians can cross together. Access to Toucan crossings will be necessary in certain circumstances from the main cycle track, for example where protected junctions cannot be provided (due to spatial constraints) or at mid-block Toucan crossings. providing a waiting area for cyclists waiting to use the Toucan crossing which is out of the way of straight-ahead cyclists. Where minimum footpath widths don't allow for a separate waiting area to be provided.
- 7.149. Overall, the proposed junction designs will ensure that pedestrian and cyclists safety is a priority whilst ensuring the free flow of buses and traffic along the route.
- 7.150. As mentioned above a number of submissions raised concerns in relation to the junction design approach proposed by the NTA. It is queried as to why an international standard such as the Dutch style junction or the Cyclops junction has not been adopted. The applicant has responded to this issue and contends that no two junctions are the same along the route. The proposed junction designs achieve the core aim of the project which is to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.
- 7.151. It is stated by the applicant that given the scale of the proposed scheme across the Greater Dublin Area a consistent design approach was required which led to the

development of the PDGB. The ambition of the PDGB was to take the benefits of the traditional junction layout from the National Cycle Manual and supplement this with a range of measures aimed at increasing protection for cyclists and reducing uncontrolled conflict with pedestrians. The Dutch Cycle Design Guide has informed the design development process for the proposed scheme.

7.152. The proposed junction design includes deflection of the cycle track at junctions to provide a protection kerb which aims to prevent collisions with general traffic. This kerb also provides for a tighter turning movement for left turning vehicles and forces them to slow down before making the turn. This design layout also keeps straight-ahead and right-turning cyclists on the raised-adjacent cycle track as far as the junction, avoiding any cyclist-vehicle conflict at weaving and merging lanes. The proposed junction design will also prevent cyclists from crossing the centre of a junction to turn right, cyclists will be required to cross at the crossing points and therefore improve their safety at such locations.

7.153. In comparison to the Dutch style junction, I note that the proposed junction layouts of the scheme include measures to mitigate pedestrian-cyclist conflict. The applicant states in their response to the submissions that the 'Dutch-style' junction described in the submission is typical of many junctions in the Netherlands and it allows for a potential un-signalised conflict between pedestrians and cyclists, which depends on a level of courtesy to ensure that collisions are avoided. Following discussions with Irish disability groups, the issue of this potential conflict was raised as a significant concern along the core bus corridors for the visually impaired and for the mobility impaired, based on their members' experiences. Pedestrians are the most vulnerable of road users, and the addition of disability exacerbates this vulnerability. The four junction types within the PDGB have specifically been set out to mitigate these potential conflicts insofar as is reasonably practicable.

7.154. It is further contended that the 'Dutch Style' junctions can result in a reduced level of service for pedestrians, requiring multimovement in multi directional, non-continuous crossings for pedestrians. The intermediate landing zones of such junctions can require substantial sized holding area for pedestrians to wait before crossing the road, this can require a significant space for urban locations. In contrast junctions 1-3 consolidate this waiting area with the footpath which a more legible and functional use of the available space for all users with direct crossing facilities that align to the

principles of DMURS. It is the applicant's contention that it is for the reasons outlined above that the 'Dutch style' junctions have not been adopted. It is also noted by the applicant that the Dutch Design Guide also contains multiple solutions for junctions and does not prescribe the same design for all locations.

7.155. I am satisfied that the applicant has adequately justified the design approach and it is clear from the layout of the different types of junctions that there will be a significant improvement in terms of safety and accessibility for both cyclists and pedestrians. In addition, having a consistent design approach throughout the city will provide legibility within the streetscape for all users that is currently absent. A clear consistent approach to street and junction layouts will encourage people to interact with the landscape in the manner which is intended by the scheme. A recognisable junction layout removes uncertainty for users and can only improve safety in the longer term.

7.156. Having regard to the foregoing, I am satisfied that the proposed junction designs conform with the key sentiments of the National Cycle Manual and the requirements of DMURS in that the user hierarchy is pivotal to the design with pedestrians being served at the outset and cyclists followed by public transport. The proposed junctions along this route are restricted in widths and in many instances particularly along the Prussia Street section of the route there is only one dedicated bus lane in one direction and there are instances whereby cyclists are not always protected by kerbs from main line traffic. As mentioned above this is as a result of space constraints. Overall, whilst I acknowledge that the proposed scheme does not propose a completely dedicated and separate bus lane in both directions for its entirety and that cycle lanes are not at optimal widths or layouts for the entirety of the route however, I acknowledge and am satisfied that the proposed development will be a significant improvement over the current bus and cycle infrastructure and will provide for a more efficient and safe experience for public transport users and cyclists along the route.

#### Provision for Pedestrians

7.157. The proposed scheme provides segregated footpaths of 2 metres in width with the exceptions referred to the table 4.5 of the EIAR. Pedestrian crossings will be simplified and shortened through the removal of left-slip lanes, road narrowing where possible, and straight crossings without staggers in median islands that require further waiting by pedestrians. At many existing junctions, pedestrian crossings are not currently

available on all arms which requires pedestrians to go around the long way and to cross the junction in stages. In the Proposed Scheme, additional pedestrian crossings will be provided at all arms for more convenience and directness. There are a number of junctions however whereby additional crossings are not provided for as the need was not apparent due to the small numbers of pedestrians.

7.158. The Proposed Scheme will increase the number of controlled pedestrian crossings from 77 in the existing to 125. Additionally, there will be an increase in the number of raised table crossings on side roads from 6 in the existing to 32. I note the improvements proposed and in the assessment of same I note the requirements of DMURS in relation to footpath widths and crossing design. The board should note that concerns have been raised in relation to footpath widths at the Navan Road section of the proposed scheme.

7.159. For the benefit of the Board the desired footpath width outlined in DMURS is 2 metres with a minimum of 1.8 metres. At specific pinch points Building for Everyone: A Universal Design Approach, defines acceptable minimum footpath widths as being 1.2m wide over a 2m length of path. Footpaths along the Navan road section of the scheme largely range between 1.8 and 2 metres with a number of pinch points along the route.

7.160. Pedestrian crossings are recommended to be provided to allow for a single, direct movement. To facilitate road users who cannot cross in a reasonable time, the desirable maximum crossing length without providing a refuge island is 19m. It is also recommended within DMURS that Build-outs should be used on approaches to junctions and pedestrian crossings in order to tighten corner radii, reinforce visibility splays and reduce crossing distances, this specification has been included within the junction designs outlined above.

7.161. Concerns have been raised relate to paving materials. I note that a consistent approach is to be taken in relation to the proposed development and materials to be used.

7.162. Overall, additional physical interventions are provided throughout the length of the core bus corridor, such as enhanced/additional pedestrian crossings, raised table side entry treatments, and enhanced separate cycling infrastructure, all infrastructure to be

provided is generally in line with the requirements of DMURS and any deviations are adequately justified and considered to be acceptable.

#### Traffic calming

7.163. There are a number of traffic calming measures that have been implemented in the Proposed Scheme that will reduce speeds including improved junction layouts with reduced corner radii, narrow carriageway lane widths, raised table crossings on side roads and proposed speed limit reductions. The additional landscaping and enhanced pedestrian/ cyclist priority measures along the Proposed Scheme will also lend themselves to the principles of self-regulating streets as set out in DMURS to encourage lower driving speeds. I am satisfied that the applicant has adequately illustrated the type and location of all such measures and consider the proposed measures necessary to the success of the proposed scheme.

#### Parking

7.164. Briefly I draw the Boards attention to the assessment of parking along the route which has been considered and examined in detail within the EIAR submitted and will in the interest of conciseness will not be repeated hereunder. This section of the report should therefore be read in conjunction with the EIAR section below. Nonetheless it is important to note at this juncture that concerns have been raised within the submissions received in relation to the removal of parking and loading bays from Prussia Street, Manor Street, Stoneybatter and St. Joseph's Road. It is contended that Manor Street is a wide street and there is no justification for the removal of parking. It is also contended that the removal of parking will put pressure on surrounding streets. Concerns relate to the removal of parking at Kavanagh's pub which is stated to be used for loading also.

7.165. The board should note that the impacts of parking loss have been examined within the EIAR section of this report and will not be repeated, however it is important to note that adequate parking for disabled persons has been retained and loading bays provided to cater for businesses in the area. In addition, the applicant has referred to the availability of existing large numbers of parking availability within 200metres of the areas listed above. Overall impacts of parking loss are not expected to be significant. In response to concerns I note the applicant also states that there will be no impact to

the existing parking arrangements on St Joseph's Road, and the adjacent access to rear of 67 Prussia Street.

7.166. Overall, whilst I acknowledge that the loss of parking can be an inconvenience, I am satisfied that adequate suitable parking is available within the surrounding area of the scheme and that proper enforcement will ensure there is a timely turnover of spaces within the area. Given that no significant impacts are expected and having regard to the overall benefits of the scheme to the wider community I am satisfied that the loss of parking is justified and acceptable.

### **Removal of Ashtown Roundabout**

7.167. Concerns have been raised within the submissions received regarding the removal of the Ashtown Roundabout. Concerns relate to the loss of trees, traffic management, the roundabout slows inbound traffic.

7.168. In note the applicant's response in this regard and refer the Board to section 2.2.3.3 of the NTA's response to submissions document. With regard to trees, I note that the existing Monterey Pine trees will be replaced within the new arrangement and the existing trees will be removed to a recycling facility.

7.169. The proposed new signalised junction will provide significantly improved facilities for cyclist and pedestrians at this junction and will improve overall visibility for road users. Whilst I acknowledge that the existing roundabout and high mature trees are a significant visual marker for entering the city, I am satisfied that the proposed junction layout will provide for a more controlled and safer junction for all road users to that compared to that currently provided and therefore consider the proposed works to acceptable in the context of the provision of a city wide sustainable and active travel network. The new planting scheme at this location will provide for a diverse range of foliage and vegetation in line with present day requirements for biodiversity enhancement within urban and suburban locations.

### **Structures**

7.170. A number of new structures are proposed along the length of the Proposed Scheme as listed in Table 4.32. There are two existing bridge structures impacted by this Proposed Scheme namely Tolka River Bridge and Mill Road Bridge. Both require widening as a result of the proposed carriageway works.

- 7.171. In relation to the Tolk River Bridge, the proposed widening to the N3 to accommodate the Proposed Scheme requires this bridge to be widened further at its southern end. The bridge will be widened by approximately 2m using precast concrete beams and a cast in-situ deck slab. The abutments will be extended to suit.
- 7.172. In relation to the Mill Road Bridge, the existing bridge will be widened along both its southern and northern sides as well as closing up of the opening within the central median. It is proposed to extend the structure using cast in-situ arrangement, similar in form to the existing structure.
- 7.173. Pedestrian Ramps - The Proposed Scheme includes additional inbound and outbound bus stops on the N3 adjacent to Mill Road. Pedestrian access from Mill Road to the new bus stops will be via new pedestrian ramps and steps on the northern and southern sides of the N3. Concerns have been raised in relation to this element of the scheme with regard to the height of the boundary wall proposed. I have reviewed the plans and photomontages and considered this element of the development to be minor in terms of visual impact. The proposed ramps will provide access to new bus stops from both sides of the N3 and the improved connectivity achieved from this element of the scheme is in accordance with the overarching principles of sustainable transport policy. I therefore consider the proposed ramps to be acceptable.
- 7.174. All of these elements have been examined in the context of environmental impacts with both the Appropriate Assessment and Environmental Impact Assessment sections of this report. In the interest of conciseness, I will not revisit these elements of the assessment and this section of the report should be read in conjunction with the aforementioned. However, it is important to note that these elements are essential to the scheme to provide of safe efficient active travel and sustainable transport scheme.
- 7.175. Overall, the aforementioned structures are necessary and acceptable in the context of the overall scheme and I note no significant objections have been made within the submissions received in relation to these structures.

### **Residential Amenity.**

- 7.176. It is of note that many submissions raise concerns about noise and air quality arising from the proposed scheme and in some instances due to the removal of existing vegetated boundaries, I would refer the Board to the EIAR section of this report in which such impacts are robustly examined and whereby it is concluded that no

significant impacts in relation to either factor is expected to arise. The proposed scheme is expected to have a long-term positive impact on noise and air quality as the introduction of a fully electric fleet and the overall reduction of vehicular traffic travelling along the route will significantly improve the current situation in terms of these emissions.

7.177. I am satisfied therefore that no significant long-term impacts are expected in relation to noise and air quality along the proposed scheme that would impact residential amenity to such a degree as to warrant a refusal.

7.178. Concerns relating to impacts to residential entrances have also been raised and have been examined within the Traffic and Transport Section of the EIAR. It is clear from the documentation submitted, that access to properties will be maintained throughout the works and as such no significant impacts are expected. The proposed scheme will provide for improved public realm and will not result in any loss of privacy to adjacent properties.

7.179. Thus, based on the plans and documents submitted I am satisfied that the proposed development is acceptable in this regard and will provide for an overall enhanced environment for residents adjacent to the proposed scheme.

### **Visual Impact**

7.180. As outlined above the proposed scheme is effectively the reallocation of road space with dedicated bus lanes and segregated cycle lanes for the full length. Works will include public realm upgrades in relation to footpath surface and alignment, supplementary planting and the realignment of and planting of central reservation areas along the route.

7.181. Upgraded junctions will provide for legible crossings for all modes and will be softened at all corners by the planting of trees, wild flowers or various grasses. The design of the overall scheme will provide a palette of consistent materials and finishes and a flow of green space along the full length of the route.

7.182. Currently, the route contains pockets of green spaces and large sections of the central reservations are planted, however the overall landscape, particularly at junctions is dominated by hard landscaping and results in an uninviting harsh street appearance. I draw the Board's attention to Volume 3 – Figures of the EIAR in which the Landscaping general arrangement drawings are contained. Proposed landscaping

along the route is clearly shown on these maps as are the trees etc to be removed. I note comments within the DCC submission which refer to the legibility of plans in relation to landscaping and based on the information submitted I am satisfied that the applicant has provided sufficient detail to adequately assess the merits of the proposed landscaping along the proposed scheme route.

7.183. It is evident that the landscaping and public realm proposals intend to soften the existing hard landscape with the use of edge planting, additional trees, pocket gardens and green pockets at junctions. Overall, the proposals provide for a more inviting space designed to cater for an improved pedestrian flow and environment. Whilst I acknowledge the concerns raised in relation to the removal of trees, I am satisfied that the proposed scheme includes an extensive replanting programme which will adequately compensate for any losses along the route.

7.184. As mentioned within the landscape section of the EIAR, the existing front boundaries of several properties are to be set back, and the proposed works will reinstate the front boundaries and landscaping therefore preventing any significant changes to the visual setting of these properties.

7.185. Having regard to the plans submitted, I am satisfied that the proposal will have a positive impact to the landscape and to people's experience of the street. The softening of landscaping enhances the pedestrian and cyclist experience and has a positive impact on the perception of an area overall.

### **Property devaluation concerns**

7.186. Third parties are concerned that the proposed scheme will devalue their properties. In general I note the NTA's response to these contentions within the EIAR submitted with the planning application in which it is concluded that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates nicer places that are more desirable for people and business to locate in, thereby increasing the value of properties in the area.

### **Prussia Street - Park Shopping Centre / Tesco**

7.187. Concerns have been raised by the Park Shopping Centre and Tesco regarding the proposed bus gate on Prussia Street and the overall impact to the shopping centre

within which Tesco is the anchor tenant. It is stated that the proposed scheme will destroy passing trade and will negatively impact on future leasing of business units at Park Shopping Centre. In addition, it is stated that the Proposed Scheme will have a significant impact on customer, delivery and service vehicles accessing the Park Shopping Centre the alternative access to the Park Shopping Centre for deliveries is not practicable and are too narrow, and it would not be possible to service Tesco Maple Centre and Tesco Prussia Street should the Proposed Scheme proceed as planned.

7.188. I note the applicant's response which details the need for the 24-hour bus gate at this location. In addition, a detailed access route to the shopping centre for both private cars and commercial vehicles is outlined within the response which clearly demonstrates that accessibility has been maintained in order to facilitate both patrons and the servicing and delivery needs of the centre. Whilst I acknowledge that the proposed scheme will result in longer journey times for commercial vehicles, I consider in the context of the overall benefits of the scheme that this inconvenience is justified and acceptable in this instance.

7.189. Therefore, whilst I acknowledge the objectors' concerns, I am satisfied that there is no other option at this location but to implement the bus gate as proposed in order to achieve the objectives of the proposed scheme.

### **Other Issues raised**

#### Fingal County Council

7.190. I note from the submissions made that Fingal County Council raise particular concerns in relation to a number of issues as follows, the Board should note that similar issues have been raised by Transport Infrastructure Ireland also and as such the following issues are to be dealt with hereunder only.

- Provision of cycle stand at all bus stops.
  - Response: Cycle stands will be provided where space permits at bus stops along the scheme. Not all stops are required to have cycle parking.
- Diverge lane between the Mill Road Bridge and access road to James Connolly Hospital is too short.

- Response: Diverge lane will reduce from 94metres to 80 metres and was assessed within the safety audit which raised no concerns for the 80km speed zone.
- Suitability of main line N3 for cyclists is questionable.
  - The proposed route along the N3 will link in with the quiet street facility at Castleknock Manor. Other FCC scheme will link Connolly Hospital on the opposite side of the carriageway. Cycle lanes at the Snugborough junction were not considered appropriate and are not a desire line for cyclists at present.
- Blanchardstown Town Centre various issues
  - Some roads in this area are not taken in charge, this will not change.
  - Concerns relating to crossings are raised - pedestrian and cyclist provisions are deemed to be reflective of the proposed speed limits in the area with segregated facilities and signalised crossings fundamental to the design. The design therefore ensures there are no instances of uncontrolled crossing locations traversing the main carriageways in this area. Additionally, good intervisibility exists at the crossing locations between drivers and pedestrians.
  - The proposed traffic lane configuration on the Blanchardstown Road North bridge over the N3 dual carriageway is considered to provide an appropriate traffic management solution, with buses given priority on the upstream N3 slip road.
  - Concerns regarding Blanchardstown Road North / Old Navan Road - it is proposed to introduce a protected style junction to enhance safety for cyclists. Proposals for the N3 on-slip junction, immediately to the south of this junction, include for the provision of a left turn filter lane with the northbound cycle track being moved to alongside the verge. This layout provides for two separate crossings of the slip road, to replace the current single and much longer cycle crossing and provides good visibility for cyclists waiting to cross.

- The general arrangement of this junction needs to balance the management of traffic at this busy suburban junction adjacent to the shopping centre with provision of safe crossing facilities for pedestrians and cyclists, and the need to provide buses with reliable journey times to and from the bus interchange. To meet these needs and due to the multi-lane nature of the approach roads staggered crossings will be utilised at this location.
- R147 Navan Parkway Interchange -the layout of bus lanes at the overbridge junctions should be designed to minimise delays for all users and the retention of a shared left turn lane should be considered.
  - Type 1 junction layout is proposed as the volume of left turning vehicles will be greater than 100 PCUs per hour and no space is available for a dedicated left turning lane.
- Drainage Issues
  - The Proposed Scheme will also take cognisance of “Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, March 2022” document where practicable.
  - The NTA acknowledge receipt of the River Tolka Flood Study Hydrology and Hydraulics Summary Report (McCloys) and has reviewed the proposed scheme in the context of the report. No impacts are expected to arise in relation to flooding.

7.191. It is clear that the proposed scheme in relation to the foregoing issues has been examined in a robust manner by the applicant in terms of road safety audit and compliance with the requirements of DMURS and the Cycle Manual. I am satisfied that the issues raised have been adequately addressed within the NTA response and am also satisfied that the proposed scheme in terms of any reduction in slipway lengths would not give rise to traffic safety issues as outlined within the Road safety audit carried out.

#### Dart West +

7.192. The Proposed Scheme facilitates improved existing and new interchange opportunities with other transport services including future rail public transport services including

DART+ and MetroLink. The NTA acknowledge the DART+ West proposals and confirm that works that are proposed are designed to ensure tie-in with the existing infrastructure at this location.

7.193. Cycle infrastructure will be provided at tie in points with aforementioned infrastructure projects in the future to provide for a fully integrated sustainable travel network.

#### Traffic Modelling

7.194. Concerns have been raised in relation to the accuracy of traffic modelling which has been carried out, it is contended that there are discrepancies between the proposed scheme and the Ballymun/Finglas scheme. I note the applicant's response in this regard within Section 2.9.10.4 of the NTA response to submissions document in which it is stated that both the Blanchardstown to City Centre Core Bus Corridor Scheme and the Ballymun / Finglas to City Centre Core Bus Corridor Scheme are separate and stand-alone CBC schemes that are independent from each other and that is why the statutory planning applications are being applied for separately. However, the potential for cumulative impacts of the Blanchardstown to City Centre Core Bus Corridor Scheme with other projects (including other CBC schemes) has been considered in the EIAR for that scheme, and similarly the potential for cumulative impacts of the Ballymun / Finglas to City Centre Core Bus Corridor Scheme with other projects (including other CBC schemes) has been considered in the EIAR for that scheme.

7.195. No cumulative impacts are expected to arise in relation to both schemes.

7.196. Additional concerns have been raised in relation to the modelling method employed. I draw the Board's attention to Appendix A6.2 Transport Modelling in which the applicant's approach to transport modelling for the proposed route is outlined. I note that four models were developed to work together to develop the proposed scheme. The Models used are also used at a national and regional level and are a known in terms of their reliability. The applicant utilised Local area data for the local model and also utilised micro simulation models to assist in the operational validation of the scheme designs and to provide visualisation of scheme operability along with its impacts and benefits.

7.197. The design of the scheme was an iterative process and responded to constraints and requirements that were added to the models overtime. Models were calibrated to

account for the difference between modelled and observed traffic flows which improved the accuracy of the outcomes of the proposed route.

7.198. The proposed route was modelled for vehicle type, speed changes, junction layouts and crossing facilities etc, all results were refined and altered to produce the preferred route and associated junctions and signalling.

7.199. It is clear from the information provided that the applicant has carried out a robust and detailed modelling of the entire route. This has been coupled with the requirements of DMURS and the National Cycle Manual to create the most suitable route within the constraints that exist along it.

7.200. It is of note that concerns were raised in relation to a difference between the information provided during the development of the scheme including journey time information. The scheme has been assessed in relation to the scheme proposed and does not take into account prior iterations of the scheme or journey time information. I am satisfied that the proposed scheme will provide an improved service in all aspects of the public bus service along it.

7.201. I am therefore satisfied that the applicants have utilised a detailed, robust and multi-faceted modelling approach to develop the proposed scheme.

7.202. I note in their submissions that both FCC and DCC planning authorities have included lists of recommended conditions. Where relevant to any of the above assessment these have been discussed previously and are also referred to within the EIAR assessment below. The Board should note that the conditions did not raise any significant issues in relation to the route or principle of the Proposed Scheme and were focused on smaller detailed design issues.

7.203. A number of the conditions requested are seeking contractual agreements to be conditioned in terms of handover, management, and maintenance of the Scheme following construction. In relation to these items, I am satisfied that the relevant legislative provisions are in place for the construction and handover of the roads infrastructure to render the attachment of such conditions unnecessary.

7.204. Other conditions are requested to ensure ongoing liaison, agreement and engagement in relation to a number of detailed measures such as drainage, methodologies of conservation and recording and carrying out works around heritage items, traffic management, agreement on detailed design features, reinstatement works, standards

to be adopted. I consider that such conditions requiring further liaison and agreement with the relevant location authority to be generally acceptable and in accordance with best practice, although I note that the applicant has stated that such liaison will occur as a matter of course and that additional specific conditions are not required, I consider that the imposition of such conditions on any consent that may issue would be appropriate and in the interests of proper planning and sustainable development.

#### Impact to Our Lady Help of Christians Catholic Parish Church

7.205. Concerns were raised within the submissions in relation to the current practice of parking hearses and mourning cars outside the church. I note the applicant's response in this regard and note that no lands are being permanently acquired at this location. The applicant will liaise with the Diocesan Trust / Parish Priest in order to ensure that access for hearses etc is maintained at the church. I am satisfied therefore that the proposed scheme will not result in any impediment to the operations of this church going forward.

#### Auburn Road changes

7.206. At the Navan Road / Auburn Avenue junction, it is proposed to move the pedestrian crossing from the west side of the junction to the east side of the junction. It is noted in Appendix A6.3 Junction Design Report that the proposed pedestrian crossing on the west side of the junction would be over 20m long and thus determined as too long for comfortable use. The proposed pedestrian crossing to the east of the junction provides a more direct desire line to the proposed inbound bus stop at Chainage A2950, concerns have been raised within the third party submissions in relation to the proposed changes at this location. Given the justification provided by the applicant, I am satisfied that the proposed arrangement will provide for a safer environment for road users and pedestrians alike.

#### **Conclusion**

7.207. Overall, it is clear that the proposed scheme has been designed in a manner that is compliant with the overriding government policy, guidelines and the Dublin City Development Plan 2022-2028 in relation to such infrastructure and the applicant has been mindful to provide detailed analysis of all aspects of the proposed scheme and appropriate justifications for the approaches taken. I am satisfied that the proposed scheme will provide a high quality, reliable, safe and aesthetically pleasing multimodal

transport corridor and will encourage a significant modal shift in favour of active and sustainable travel modes into and out of the city. Whilst I acknowledge all of the concerns raised by third parties I am satisfied that the applicant has provided clear, robust and detailed information in relation to the design and layout of the proposed scheme and has provided clear detailed and robust justifications for all aspects of the scheme and has clearly outlined how this scheme can contribute to the achievement of a low carbon society and economy through the sustainable movement of people into and out of the city. I am therefore satisfied that the proposed development is in accordance with the proper planning and sustainable development of the area.

7.208. It must be acknowledged that a significant number of issues have been raised which I have considered and endeavoured to examine throughout this report. It must also be acknowledged, as discussed throughout this report that there is significant difficulty in retrofitting sustainable and active travel infrastructure into a densely developed urban fabric and as a general comment it must be recognised and accepted that optimum design standards cannot always be met in such situations. Guidance such as DMURS accepts that such situations arise.

7.209. Therefore, in overall conclusion of this assessment I am satisfied that the proposed development whilst it does not provide optimal design specifications in all instances, does provide for significantly improved public transport and active travel infrastructure. In addition to the foregoing and in the context of improvements in journey times, it is also important to acknowledge that whilst in some instances speed of journeys improve moderately, the improvements to public realm and the improved and enhanced experience of public transport and safety of active travel infrastructure is significant. The proposed scheme from a visual and circulation experience significantly improves the general environment within and surrounding the scheme and will therefore provide a positive experience for residents and commuters in the area of the scheme. Such improvements are proven to be effective in the reduction in antisocial behaviour which has been the concern of many third parties along the route.

7.210. It is of further note that all issues have been considered and whilst not specifically referred to within this report are considered in the context of the scheme and appropriate conditions have been recommended where considered necessary.

## 8.0 **Appropriate Assessment**

### 8.1. Consideration of the Likely Significant Effects on a European Site

#### **Article 6(3) of the Habitats Directive**

8.2. The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB are considered fully in this section. The areas addressed in this section are as follows:

- The Natura Impact Statement
- Screening for appropriate assessment
- Appropriate assessment of implications of the proposed development on the integrity of each European site.

#### **The Natura Impact Statement and Supplemental Information**

8.3. The application is accompanied by an AA Screening report and an NIS (2022) which describes the proposed development, the project area and the surrounding area. The construction management plan is also a key document in terms of the implementation of mitigation measures.

8.4. All Ecology and Appropriate assessment related documents have been prepared by staff ecologists from Scott Cawley and informed by desk study including reference material from the NPWS website and data base and by field surveys.

8.5. A description of all baseline surveys is outlined within section 4.6 of the NIS. The following is a list of surveys undertaken:

8.6. Habitats, Flora and Fauna surveys (which included Otter), –were carried out in June and August 2018, August 2020, and December 2020,

8.7. The desk study identified all hydrological crossing points within the footprint of the Proposed Scheme and identified two hydrological crossing points within the footprint of the Proposed Scheme which involved instream works, modifications to banks or significant disturbance. These sites are both located on the Blanchardstown Bypass N3, adjacent to Waterville Park and were surveyed by Triturus Environmental Ltd. in October and November 2020, aquatic surveys were carried out due to in stream works proposed and the suitability of water features and associated foraging, roosting, and

nesting habitats, located within or directly adjacent to the Proposed Scheme, were assessed for kingfisher potential in October 2020. Where suitable habitat existed, surveys extended approximately 500m upstream and downstream of the proposed crossing point. Evidence of kingfisher activity at any potential nest holes was recorded.

- 8.8. A desk study was carried out to identify any potential suitable inland feeding and / or roosting sites for wintering birds located within or directly adjacent to the Proposed Scheme. It is stated that there are no suitable wintering bird sites which would be subject to habitat loss by to the Proposed Scheme. One site, Belvedere Sports Grounds in Cabra is proximally located to the Proposed Scheme, but no loss of suitable forage territory will arise as a result of the Proposed Scheme, by virtue of the nature of the built ground that is required and as the Proposed Scheme is separated from the inland feeding areas by buildings.
- 8.9. The receiving environment is described in line with standard methodology (Fossitt 2000) and results of the field surveys are presented in NIS Section 5 and considered further in my assessment below.
- 8.10. There were five areas of non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations identified along or adjacent to the Proposed Scheme. These records relate to areas of Himalayan Balsam along the banks of the Tolka
- 8.11. No records of any Annex II plant species were recorded within the footprint of the Proposed Scheme during field surveys.
- 8.12. Signs of otter, an Annex II species, were recorded during surveys within the footprint of the Proposed Scheme, along the River Tolka, where it flows under the Blanchardstown Bypass, east of Blanchardstown Garda Station. An otter spraint and a gelatinous otter spraint were recorded on the Blanchardstown Bypass underpass, north of Herbert Road. Signs of mammal activity i.e. disturbance of the riverbank and footprints were also recorded in this area. A potential (degraded) otter spraint was observed at the Tolka river road bridge underpass(structure BC1), although the footprints were of small mammals. A gelatinous spraint was also noted on the upstream side of structure BC1.
- 8.13. The nearest European site for which this species is designated is the Wicklow Mountains SAC, which is located approximately 12km south of the Proposed Scheme.

The SAC is located within a different sub catchment (Dodder\_SC\_010) to the Proposed Scheme which falls within (Tolka\_SC\_10 and Tolka\_SC\_020). As such, populations of otter within the footprint of the Proposed Scheme are not deemed to be connected to the SAC population.

- 8.14. The desk study (Appendix II) found that kingfisher *Alcedo atthis*, an Annex I species, are known to occur within 1km of the Proposed Scheme and across the wider study area. In particular, a population of kingfisher are reported to be present along the River Tolka in the vicinity of Tolka Valley Park. A kingfisher was observed flying along the River Tolka during field surveys, less than 70m from the Proposed Scheme. It is therefore likely that kingfisher nest, forage and roost in the vicinity of the Proposed Scheme, although no suitable nesting habitat was noted at any watercourse intersected by the Proposed Scheme.
- 8.15. The desk study returned records of three breeding gull species within 300m of the Proposed Scheme which may use inland amenity grassland feeding sites including black-headed gull *Chroicocephalus ridibundus*, herring gull *Larus argentatus*, and lesser black-backed gull *Larus fuscus*.
- 8.16. A desk-based review of lands within 300m of the Proposed Scheme returned records of six SCI wintering bird species which may use inland amenity grassland feeding sites, including light-bellied brent goose, lapwing, oystercatcher, black-headed gull, herring gull and lesser black-backed gull.
- 8.17. A review of a study into light-bellied brent goose inland feeding sites has identified no known inland wintering bird feeding sites in the footprint of the Proposed Scheme. There are three known inland wintering bird feeding sites within approximately 300m of the Proposed Scheme i.e. the general construction works disturbance Zol16 . None will be directly impacted by the Proposed Scheme and there will be no habitat loss at any of these sites.
- 8.18. The Proposed Scheme will cross two watercourses: the River Tolka and the Royal Canal and will tie into infrastructure at the River Liffey at Elis Quay. In the northern section, the Proposed Scheme will terminate at St. Margaret's Road, in close proximity to the River Santry. In the southern section, the Proposed Scheme will terminate at R148 Arran Quay, adjacent to the Liffey Estuary Upper. The drainage system for the Proposed Scheme will discharge to the following surface water receptors; Tolka\_040,

Tolka\_050, Royal Canal, Dublin Zoo ponds, Liffey Estuary, and to Ringsend WwTP (which ultimately discharges to Liffey Estuary Lower, Dublin Bay, post treatment).

- 8.19. Details on the water quality of each watercourse, as sourced from the Environmental Protection Agency (EPA), and the distances from the proposed crossing point to downstream waterbodies are also provided in Table 7.
- 8.20. **It is important to note that the proposed scheme does not overlap with any European site. The nearest European Site to the Proposed Scheme is South Dublin Bay and Tolka Estuary SPA, located 6km downstream of the terminus at Ellis Quay, via the Liffey Estuary Upper.**
- 8.21. The scientific assessment to inform AA is presented in sections 5 -7 of the NIS and in the documentation submitted to the Board as part of the application. The conservation objectives of the various qualifying interest features and special conservation interest species are listed. Impact pathways are identified and the assessment of likely significant effects which could give rise to adverse effects on site integrity presented in Table 7 & 8.
- 8.22. Mitigation measures are presented within section 7.1.4 of the NIS and are also detailed in full in the Construction Management Plan (CMP). An assessment of potential in-combination effects is presented in Section 9 of the NIS.
- 8.23. The NIS together with supplemental information concludes that, following an examination, analysis and evaluation of the relevant information, including the nature of the predicted effects from the proposed development, and mitigation measures to avoid such effects, that the proposed development will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.

**Adequacy of information submitted by the applicant.**

- 8.24. Having reviewed the NIS and supplemental information that accompanies the application, I am satisfied that there is adequate information to undertake Screening and Appropriate Assessment of the proposed development on lands adjacent to and surrounding the Blanchardstown Shopping Centre to the City Centre I am satisfied that all possible European Sites that could in anyway be affected have been considered by the Applicant.

8.25. I am satisfied that all ecological survey work and reporting has been undertaken and prepared by competent experts in line with best practice and scientific methods. Information on the competencies and professional memberships of the Ecological team are provided in the NIS. I am also satisfied that all potential impact mechanisms have been considered and appropriately assessed within the NIS document.

### **Screening for Appropriate Assessment**

8.26. The first test of Article 6(3) is to establish if the proposed development could result in likely significant effects to a European site, in which case the development is 'screened in' for further detailed assessment- appropriate assessment (stage 2).

8.27. The screening assessment undertaken on behalf of the applicant referred to within the NIS document submitted concluded that the potential for significant effects could not be ruled out for **18 no. European Sites** within the Dublin area in view of the conservation objectives of those sites and thus the proposed development must proceed to (stage 2) Appropriate Assessment, and an NIS prepared to inform this stage. Given the location of the new candidate North West Irish Sea SPA which extends offshore along the coasts of counties Louth, Meath and Dublin, and is approximately 2,333km<sup>2</sup> in area and is adjacent to and ecologically connected to several existing SPAs in this area which have been screened in by the applicant. I have included this site within my screening for Appropriate Assessment which brings the total number of sites to 19.

8.28. I note that in determining the potential significant effects of the proposed development, the applicant took account of the potential for ex-situ effects for foraging birds and mammals such as Otter. It is of note that a precautionary approach has been taken in including SAC and SPA sites in the wider area in the screening exercise. Given that bird species can travel up to 20km from designated sites the applicant has included sites at some remove from the proposed development site.

8.29. Similarly, a precautionary approach has been taken in relation to SCIs associated with SACs in the wider area. Potential impacts and effects considered are presented in table 1.

**Table 1. Summary of European Sites for which the likelihood of significant effects cannot be ruled out (Applicant).**

<b>Potential impacts and zone of influence of effects</b>	<b>European sites within Zone of Influence</b>
<p><b>Habitat loss and Fragmentation</b></p> <p>No European sites are at risk of direct habitat loss impacts. There is potential for loss of ex situ inland feeding sites used by SCI bird species.</p>	<p><b>No</b></p> <p>There are no European sites at risk of habitat loss impacts associated with the Proposed Scheme</p>
<p><b>Habitat degradation/ effects on QI/SCI species as a result of hydrological impacts:</b></p> <p>Habitats and species downstream of the Proposed Scheme and the associated surface water drainage discharge points, and downstream of offsite wastewater treatment plants</p>	<p><b>Yes</b></p> <p>There are European sites at risk of hydrological effects associated with the Proposed Scheme:</p> <p>Baldoyle Bay SAC, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Skerries Islands SPA, Rockabill SPA, Lambay Island SPA, Ireland's Eye SPA, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Dalkey Islands SPA, The Murrough SPA, Rockabill to Dalkey Island SAC and Lambay Island SAC. and the North West Irish Sea SPA</p>
<p><b>Habitat degradation as a result of hydrogeological impacts:</b></p> <p>Groundwater-dependant habitats, and the species those habitats support, in the local area that lie downgradient of the Proposed Scheme.</p>	<p><b>No</b></p> <p>There are no European sites at risk of hydrogeological effects associated with the Proposed Scheme</p>
<p><b>Habitat degradation as a result of introducing/spreading non-native invasive species:</b> Habitat areas within, adjacent to, and potentially downstream of the Proposed Scheme</p>	<p><b>Yes</b></p> <p>Although no non-native invasive species were recorded within the boundary of the Proposed Scheme, there are non-native invasive species present adjacent to the Proposed Scheme and, therefore, a risk associated with the Proposed Scheme to downstream European sites from the spread/introduction</p>

	of non-native invasive species: North Dublin Bay SAC, South Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA, North - West Irish Sea SPA.
<b>Air quality impacts Potentially up to 200m from the Proposed Scheme boundary:</b>	<b>No</b> There are no European sites at risk of air quality effects associated with the Proposed Scheme
<b>Disturbance and displacement impacts:</b> Potentially up to several hundred metres from the Proposed Scheme, dependent upon the predicted levels of noise, vibration and visual disturbance associated with the Proposed Scheme, taking into account the sensitivity of the qualifying interest species to disturbance effects	<b>Yes</b> There are no European sites within the potential zone of influence of disturbance effects associated with the construction or operation of the Proposed Scheme. However, there are ex-situ inland feeding sites which are utilised by SCI wintering bird species within the potential disturbance ZoI of the Proposed Scheme for Malahide Estuary SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, and The Murrough SPA, North West Irish Sea SPA.

### Screening Determination (recommendation)

8.30. Having regard to the information presented in the AA Screening Report, NIS, submissions, the nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors, I concur with the applicant's screening determination that there is potential for significant effects on the

- North Dublin Bay SAC,
- South Dublin Bay SAC,

- Howth Head SAC,
- Howth Head Coast SPA,
- Rockabill to Dalkey Island SAC,
- Lambay Island SAC,
- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Islands SPA,
- Malahide Estuary SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and the
- Murrough SPA.

8.31. I also consider in addition to the above that there is potential to impact on the newly designated North West Irish Sea SPA.

8.32. I do not however consider that the Baldoyle Bay SAC should be brought forward for stage two as the works are significantly removed from this SAC and in the event of any pollution event I consider that such an event would be so significantly diluted and dispersed within the sea that significant adverse effects to this SAC would not arise.

8.33. Given the hydrological connections and proximity of the proposed works to ex-situ feeding sites associated with the Qualifying Interests of the European sites listed above and the potential relationship with all European sites within the zone of influence, and their conservation objectives, it is reasonable to conclude that there is a potential for impacts to arise in relation to habitat degradation and disturbance and displacement. As screening is considered at pre-assessment stage, further analysis is required to determine the significance of such impacts and if appropriate, where any potential impacts are identified on the qualifying interests associated with natura 2000 sites, to apply any mitigation measures to exclude adverse effects. Therefore, North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA,

Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA, are brought forward for inclusion in the Stage 2 AA.

### **Appropriate Assessment (recommendation)**

8.34. The following is an objective assessment of the implications of the proposal on the relevant conservation objectives of the European sites based on the scientific information provided by the applicant and taking into account expert opinion and submissions on nature conservation. It is based on an examination of all relevant documentation and submissions, analysis and evaluation of potential impacts, findings conclusions. A final determination will be made by the Board.

8.35. All aspects of the project which could result in significant effects are assessed and mitigation measures designed to avoid or reduce any adverse effects on site integrity are examined and evaluated for effectiveness. I have relied on the following guidance:

- DoEHLG (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, National Parks and Wildlife Service. Dublin
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC.

### **Relevant European sites:**

8.36. In the absence of mitigation or further detailed analysis, the potential for significant effects could not be excluded for:

- North Dublin Bay SAC,
- South Dublin Bay SAC,
- Howth Head SAC,
- Rockabill to Dalkey Island SAC,

- Lambay Island SAC,
- Howth Head Coast SPA,
- North Bull Island SPA,
- South Dublin Bay and River Tolka Estuary SPA,
- Dalkey Islands SPA,
- Malahide Estuary SPA,
- Rockabill SPA,
- Baldoyle Bay SPA,
- Rogerstown Estuary SPA,
- Skerries Islands SPA,
- Ireland's Eye SPA,
- Lambay Island SPA and the
- Murrough SPA.
- North West Irish Sea SPA,

8.37. A description of the sites and their Conservation Objectives and Qualifying Interests/Special Conservation Interests, including relevant attributes and targets for these sites, are set out in the NIS section 7- Assessment of Potential Effects.

8.38. I have also examined the Conservation Objectives Supporting Documents for these sites, available through the NPWS website ([www.npws.ie](http://www.npws.ie)).

8.39. Tables 2-8 below summarise the information considered for the Appropriate Assessment and site integrity test. I have taken this information from that provided by the applicant within the NIS. I expand on certain issues further in my report.

**Table 2: AA summary matrix for North Dublin Bay SAC**

<p><b>North Dublin Bay SAC [000206]</b></p> <p><b>Detailed Conservation Objectives available:</b> <a href="#">ConservationObjectives.rdl (npws.ie)</a></p>
<p><b>Summary of Appropriate Assessment</b></p>

<b>Special Conservation Interest (SCI)</b>	<b>Conservation Objectives Targets and attributes (summary- inserted)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<b>Mudflats and sandflats not covered by seawater at low tide</b>	To maintain the favourable conservation condition in relation to habitat, community - extent/vegetation structure/distribution including fine sand to sandy mud with <i>Pygospio elegans</i> and Crangon crangon community complex; Fine sand with <i>Spio martinensis</i> community complex.	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to:
<b>Annual vegetation of drift lines</b>	Restore the favourable conservation condition in relation to habitat - extent/structure/distribution/ composition. Maintain presence of sea rocket ( <i>Cakile maritima</i> ), sea sandwort ( <i>Honckenya peploides</i> ), prickly saltwort ( <i>Salsola kali</i> ) and oraches ( <i>Atriplex</i> spp.)	An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.	the use of silt fences, silt curtains, settlement lagoons and filter materials.  Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.
<b>Salicornia and other annuals colonising mud and sand</b>	Restore the favourable conservation condition in relation to habitat - extent/vegetation structure/distribution/  Composition/variation and no significant expansion of common cordgrass.		Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc.
<b>Atlantic salt meadows (Glaucopuccinellietalia maritimae)</b>	To maintain the favourable conservation condition in relation to habitat, community - extent/vegetation structure of habitat & physical structure /distribution		Implementation of SUDs when complete to control run off during the
<b>Mediterranean salt meadows (Juncetalia maritimi)</b>			
<b>Embryonic shifting dunes</b>	To restore the favourable conservation condition in relation to habitat – area/distribution/physical structure/vegetation structure and composition.		
<b>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes)</b>			

<b>Fixed coastal dunes with herbaceous vegetation (grey dunes)</b>			operation of the scheme.
<b>Humid dune slacks</b>			
<b>Petalophyllum ralfsii (Petalwort)</b>	To maintain the favourable conservation condition in relation to distribution/ population size/ habitat / hydrological conditions/ vegetation structure.	The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. These species may outcompete other native species present, negatively impacting the species composition, diversity and abundance and the physical structural integrity of the habitat	See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan.
<b>Overall conclusion: Integrity test</b>			
<p>The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.</p> <p>Based on the information provided, I am satisfied that adverse effects can be excluded for North Dublin Bay SAC. No wetland habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the all watercourses and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.</p> <p>The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with the Invasive Species Management Plan appended to the NIS.</p> <p>Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.</p> <p><b>The proposed development would not delay or prevent the attainment of the Conservation objectives of the North Dublin Bay SAC.</b></p>			

**Table 3: AA summary matrix for South Dublin Bay SAC**

<b>South Dublin Bay SAC [000210]</b>
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Detailed Conservation Objectives available: [ConservationObjectives.rdl \(npws.ie\)](#)

**Summary of Appropriate Assessment**

<b>Qualifying Interest feature</b>	<b>Conservation Objectives Targets and attributes (summary- inserted)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
	Maintain favourable conservation condition	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to the use of silt fences, silt curtains, settlement lagoons and filter materials.
<b>Mudflats and sandflats not covered by seawater at low tide</b>	Maintain favourable conservation condition in relation to habitat area, community extent/vegetation structure/distribution including <i>Zostera</i> dominated community and fine sands with <i>Angulus tenuis</i>	An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.	Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.
<b>Annual vegetation of drift lines</b>	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of
<b>Salicornia and other annuals colonising mud and sand</b>	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		
<b>Embryonic shifting dunes</b>	Restore favourable conservation condition in relation to habitat area, distribution, physical structure, vegetation structure and composition		

		<p>Spread of invasive could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. These species may outcompete other native species present, negatively impacting the species composition, diversity and abundance and the physical structural integrity of the habitat.</p>	<p>construction related traffic etc.</p> <p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan.</p>
<p><b>Overall conclusion: Integrity test</b></p> <p>The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.</p> <p>Based on the information provided, I am satisfied that adverse effects can be excluded for South Dublin Bay SAC. No wetland habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of watercourses and existing surface water pipes which drain to Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality. The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with the Invasive Species Management Plan appended to the NIS.</p> <p>Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.</p> <p><b>The proposed development would not delay or prevent the attainment of the Conservation objectives of the South Dublin Bay SAC.</b></p>			

**Table 4: AA summary matrix for Howth Head SAC**

**Howth Head SAC [000202]**

Summary of Appropriate Assessment			
Special Conservation Interest (SCI)	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
<b>Vegetated sea cliffs of the Atlantic and Baltic coasts</b>	<p>Maintain favourable conservation condition in relation to habitat length/distribution/structure and hydrological regime, vegetation structure:</p> <p>zonation transitional zones, natural processes etc,</p> <p>vegetation height/composition –</p> <p>negative indicator species to be below 5% and bracken less than 10% etc.</p> <p>Terrestrial habitats above the high tide line are not at risk of effects from water pollution in Dublin Bay</p>	<p>An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quality (vegetation structure and composition) and area/distribution of intertidal/coastal habitats.</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment. Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc. Implementation of SUDs when complete to control run off during the operation of the scheme.</p>
<b>European dry heaths</b>	<p>Maintain favourable conservation condition in relation to habitat length/distribution/Ecosystem – maintain soil nutrient</p>	<p>None, the proposed development is not connected to this SCI</p>	<p>None required.</p>

	status/community diversity/vegetation composition-number of positive indicator species at monitoring stop at least 2. Vegetation percentage cover per species in line with that outlined in Objective.		
<p><b>Overall conclusion: Integrity test</b></p> <p>The applicant determined that following the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.</p> <p>Based on the information provided, I am satisfied that adverse effects can be excluded for Howth Head SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of adjacent watercourses and existing surface water pipes which drain to Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.</p> <p>Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.</p> <p><b>The proposed development would not delay or prevent the attainment of the Conservation objectives of the Howth Head SAC</b></p>			

**Table 5: AA summary matrix for Rockabill to Dalkey Island SAC**

**Rockabill to Dalkey Island SAC [003000]**

Detailed Conservation Objectives available: [ConservationObjectives.rdl \(npws.ie\)](#)

**Summary of Appropriate Assessment**

Qualifying Interest feature	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
Reefs	Maintain favourable conservation condition in relation to habitat area, distribution and community structure.	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quality (vegetation structure and composition) and area/distribution of intertidal/coastal habitats.	Detailed pollution control measures  to protect water quality are outlined within section 7.1.4 and include but are not limited to:  the use of silt fences, silt curtains, settlement lagoons and filter materials.  Provision of exclusion zones and barriers
Harbour porpoise <i>Phocoena phocoena</i>	Maintain favourable conservation condition in relation to access to suitable habitat and prevention of disturbance by human activity.	Pollution event could potentially affect the quality of the intertidal /marine habitats which support harbour porpoise and fish prey species.	(e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.  Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks

			<p>commence. Fuels to be stored in bunded areas, management of construction related traffic etc.</p> <p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p>
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**Overall conclusion: Integrity test**

The applicant determined that following the implementation of mitigation measures the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for Rockabill to Dalkey Island SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of adjacent watercourses and existing surface water pipes which drain to Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.

Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.

**The proposed development would not delay or prevent the attainment of the Conservation objectives of the Rockabill to Dalkey Island SAC.**

Table 6 AA Summary matrix for Lambay Island SAC

Lambay Island SAC [000204]				
Detailed Conservation Objectives available: <a href="#">ConservationObjectives.rdl (npws.ie)</a>				
Summary of Appropriate Assessment				
Qualifying feature	Interest	Conservation Objectives Targets and attributes (summary- inserted)	Potential adverse effects	Mitigation measures
		Maintain favourable conservation condition		
Reefs		Maintain favourable conservation condition in relation to habitat area/distribution/community complex and subtidal reef community complex in natural condition.	No pathway for impacts to occur on any habitats associated with this SAC as it is located a significant distance from the proposed scheme on the far side of the Howth peninsula and separated by a large marine waterbody.	None required.
Vegetated sea cliffs of the Atlantic and Baltic coast		Maintain favourable conservation condition in relation to habitat length; no decline in habitat distribution; no alteration to natural functioning of geomorphological and hydrological processes; maintain range of sea cliff habitat zonations; maintain structural variation within sward; maintain range of Irish Sea Cliff Survey species; negative indicator species less than 5%; and cover of bracken and woody species on grassland/heath less than 10% and 20% respectively	As Above	
Halichoerus grypus (Grey Seal)		No restriction of species range by artificial barriers to site use; breeding and moult and resting haul-out sites maintained in natural condition; and human activities should occur at levels that do not adversely affect the species at the site.	Pollution event could potentially affect the quality of the intertidal /marine habitats which support grey seal and harbour seal.	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones
Phoca vitulina (Harbour Seal)		No restriction of species range by artificial barriers to site use; breeding and moult and resting haul-out sites maintained in natural	As Above	

	condition; and human activities should occur at levels that do not adversely affect the species at the site.		<p>and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to: the use of silt fences, silt curtains, settlement lagoons and filter materials. Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p>
Phocoena phocoena (Harbour Porpoise)	Maintain favourable conservation condition	As above	

**Overall conclusion: Integrity test**

The applicant determined that following the implementation of mitigation measures the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects can be excluded for Lambay Island SAC. No habitat loss will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of adjacent

watercourses and existing surface water pipes which drain to Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.  
Based on the information submitted, surveys carried out analysis provided I am satisfied that no uncertainty remains.

**The proposed development would not delay or prevent the attainment of the Conservation objectives of the Lambay Island SAC.**

**Table 8: AA Summary matrix for North Bull Island SPA, Baldoyle Bay SPA, Malahide Estuary SPA, Dalkey Islands SPA, Howth Head Coast SPA, South Dublin Bay and River Tolka Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Rockabill SPA, Ireland’s Eye SPA, Lambay Island SPA, North West Irish Sea SPA.**

**North Bull Island SPA [004006], Baldoyle Bay SPA [004016], Malahide Estuary SPA [004025] and Dalkey Islands SPA [004172], Howth Head Coast SPA [004113], South Dublin Bay and River Tolka Estuary SPA [004024], Rogerstown Estuary SPA [004015], Skerries Islands SPA [004122], Rockabill SPA [004014], Ireland’s Eye SPA [004117], Lambay Island SPA [004069], North West Irish Sea SPA [004236]**

**Maintain or restore favourable conservation condition.**

**Detailed Conservation Objectives available:** <https://www.npws.ie>

**North Bull Island SPA [004006],**

Light-bellied Brent Goose (*Branta bernicla hrota*), Shelduck (*Tadorna tadorna*), Teal (*Anas crecca*), Pintail (*Anas acuta*), Shoveler (*Anas clypeata*), Oystercatcher (*Haematopus ostralegus*), Golden Plover (*Pluvialis apricaria*), Grey Plover (*Pluvialis squatarola*), Knot (*Calidris canutus*), Sanderling (*Calidris alba*), Dunlin (*Calidris alpina*), Black-tailed Godwit (*Limosa limosa*), Bar-tailed Godwit (*Limosa lapponica*), Curlew (*Numenius arquata*), Redshank (*Tringa totanus*), Turnstone (*Arenaria interpres*), Black-headed Gull (*Chroicocephalus ridibundus*), Wetland and Waterbirds

**Summary of Appropriate Assessment**

<b>Conservation Objectives</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<b>Targets and attributes (summary)</b>		
Long term pop trend stable or increasing  No significant decrease in distribution range, timing or intensity of use of areas by all the above named species other than occurring from natural patterns of variation.	An accidental pollution event during construction could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quality the of intertidal/coastal habitats that support the special conservation interest bird	Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to:  the use of silt fences, silt curtains, settlement lagoons and filter materials.  Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the

	<p>species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p> <p>The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. This in turn could affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p>	<p>existing drainage systems and hence the downstream receiving water environment.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc.</p> <p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan,</p>
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**Baldoyle Bay SPA [004016]**

Light-bellied Brent Goose, Shelduck, Ringed Plover, Golden Plover, Grey Plover, Bar-tailed Godwit

**Summary of Appropriate assessment**

<b>Conservation Objectives</b>  <b>Targets and attributes</b>  <b>(summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<p>Long term pop trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas by wintering waterbirds</p>	<p>In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal / coastal habitats that support the special</p>	<p>As Above in relation to water quality protection.</p>

	conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.	
<b>Dalkey Island SPA [004172]</b>		
Roseate Tern, Common Tern, Artic Tern		
<b>Summary of Appropriate assessment</b>		
<b>Conservation Objectives Targets and attributes (summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality and suitability of roosting sites within the SPA.	As Above in relation to water quality protection.
<b>Howth Head Coast SPA [004113]</b>		
Kittiwake Rissa tridactyla		
<b>Summary of Appropriate assessment</b>		
<b>Conservation Objectives Targets and attributes (summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal/coastal habitats that	As above in relation to water quality. Section 7.1.4 of NIS.

	support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.	
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**South Dublin Bay and River Tolka Estuary SPA [004024]**

Light-bellied Brent Goose (*Branta bernicla hrota*), Oystercatcher (*Haematopus ostralegus*), Ringed Plover (*Charadrius hiaticula*), Grey Plover\* (*Pluvialis squatarola*), Knot (*Calidris canutus*), Sanderling (*Calidris alba*), Dunlin (*Calidris alpina*), Bar-tailed Godwit (*Limosa lapponica*), Redshank (*Tringa totanus*), Black-headed Gull (*Chroicocephalus ridibundus*), Roseate Tern (*Sterna dougallii*), Common Tern (*Sterna hirundo*), Arctic Tern (*Sterna paradisaea*), Wetland and Waterbirds.

\*Grey Plover (*Pluvialis squatarola*) is proposed for removal from the list of SCI's for the site so no site specific conservation objective is included for the species

**Summary of Appropriate assessment**

<b>Conservation Objectives Targets and attributes (summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<p>Long term pop trend stable or increasing</p> <p>Distribution - no significant decrease in range, timing or intensity of use of areas by wintering waterbirds</p> <p>No decline in roosting or breeding colonies .</p> <p>Human activities should occur at levels that do not adversely affect breeding or roosting sites.</p>	<p>An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quality the of intertidal / coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p> <p>The introduction and / or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. This in turn could affect the use of habitat areas by birds and</p>	<p>As Above in relation to protection of water quality.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan,</p>

	have long-term effects on the SPA populations.	
<b>Irelands Eye SPA [0045117]</b>		
Cormorant <i>Phalacrocorax carbo</i> , Herring Gull <i>Larus argentatus</i> , Kittiwake <i>Rissa tridactyla</i> , Guillemot <i>Uria aalge</i> , Razorbill <i>Alca torda</i> .		
<b>Summary of Appropriate assessment</b>		
<b>Conservation Objectives</b> <b>Targets and attributes</b> <b>(summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
Long term pop trend stable or increasing  No significant decrease in range, timing or intensity of use of areas	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality of intertidal / coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.	As Above in relation to protection of water quality.
<b>Malahide Estuary SPA [004025]</b>		
Great Crested Grebe <i>Podiceps cristatus</i> , Light-bellied Brent Goose <i>Branta bernicla hrota</i> , Shelduck <i>Tadorna tadorna</i> , Pintail <i>Anas acuta</i> , Goldeneye <i>Bucephala clangula</i> , Red-breasted Merganser <i>Mergus serrator</i> , Oystercatcher <i>Haematopus ostralegus</i> , Golden Plover <i>Pluvialis apricaria</i> , Grey Plover <i>Pluvialis squatarola</i> , Knot <i>Calidris canutus</i> , Dunlin <i>Calidris alpina</i> , Black-tailed Godwit <i>Limosa limosa</i> , Bar-tailed Godwit <i>Limosa lapponica</i> Redshank <i>Tringa tetanus</i> , Wetland and Waterbirds		
<b>Summary of Appropriate Assessment</b>		
<b>Conservation Objectives</b> <b>Targets and attributes</b> <b>(summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
Long term pop trend stable or increasing	As above	As Above

<p>No significant decrease in range, timing or intensity of use of areas</p> <p>Habitat area / Hectares /The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 765ha, other than that occurring from natural patterns of variation</p>		
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**Rogerstown Estuary SPA [004015]**

Greylag Goose *Anser anser*, Brent Goose *Branta bernicla hrota*, Shelduck *Tadorna tadorna*, Shoveler *Anas clypeata*, Oystercatcher *Haematopus ostralegus*, Ringed Plover *Charadrius hiaticula*, Grey Plover *Pluvialis squatarola*, Knot *Calidris canutus*, Dunlin *Calidris alpina*, Black-tailed Godwit *Limosa limosa*, Redshank *Tringa tetanus*, Wetlands

**Summary of Appropriate Assessment**

<b>Conservation Objectives</b>  <b>Targets and attributes</b>  <b>(summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<p>Long term pop trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas</p>	<p>As Above</p>	<p>As Above</p>

**Skerries Islands SPA [004122]**

Cormorant *Phalacrocorax carbo*, Shag *Phalacrocorax aristotelis*, Brent Goose *Branta bernicla hrota*, Purple Sandpiper *Calidris maritima*, Turnstone *Arenaria interpres*, Herring Gull *Larus argentatus*

**Summary of Appropriate Assessment**

<b>Conservation Objectives</b>  <b>Targets and attributes</b>  <b>(summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<p>As Above</p>	<p>In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An</p>	<p>As Above in relation to water quality protection.</p>

	accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal / coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations	
<b>Lambay Island SPA [004069]</b>		
Fulmar Fulmarus glacialis, Cormorant Phalacrocorax carbo, Shag Phalacrocorax aristotelis, Greylag Goose Anser answer, Lesser Black-backed Gull Larus fuscus, Herring Gull Larus argentatus, Kittiwake Rissa tridactyla, Guillemot Uria aalge, Razorbill Alca torda, Puffin Fratercula arctica		
<b>Summary of Appropriate Assessment</b>		
<b>Conservation Objectives</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<b>Targets and attributes (summary)</b>		
As Above	In a worst case scenario, an accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay, which SCI birds may utilise outside of their core SPA foraging areas. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality the of intertidal / coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations	As Above in relation to protection of water quality.
<b>The Murrrough SPA [004186]</b>		
Red-throated, Diver Gavia stellata, Greylag Goose Anser answer, Light Bellied Brent Goose Branta bernicla hrota, Wigeon Anas Penelope, Teal Anas crecca, Little Tern Sterna albifrons, Wetlands		

<b>Conservation Objectives Targets and attributes (summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
To maintain or restore the favourable conservation condition of the wetland habitat at The Murrough SPA as a resource for the regularly-occurring migratory waterbirds that utilise it.	As Above	As Above
<b>Rockabill SPA [004014]</b>		
Purple Sandpiper <i>Calidris maritima</i> , Roseate Tern <i>Sterna dougallii</i> , Common Tern <i>Sterna hirundo</i> , Arctic Tern <i>Sterna paradisaea</i>		
<b>Conservation Objectives Targets and attributes (summary)</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>
<p>Long term pop trend stable or increasing</p> <p>No significant decrease in range, timing or intensity of use of areas</p> <p>Human activities should occur at levels that do not adversely affect the breeding roseate tern population, the Common Tern population or the Arctic Tern population – there should be no significant decline in these populations.</p>	<p>An accidental pollution event during construction or operation could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either along or cumulatively with other pollution sources, could potentially affect the quantity and quality of prey fish species and the quality and suitability of roosting sites within the SPA.</p> <p>Note Purple Sandpiper is located a significant distance from the proposed scheme and on the far side of the Howth peninsula and is not at risk of significant effects.</p>	As Above in relation to water quality protection.
<b>North West Irish Sea SPA (004236)</b>		
Common Scoter ( <i>Melanitta nigra</i> ), Red-throated Diver ( <i>Gavia stellata</i> ), Great Northern Diver ( <i>Gavia immer</i> ), Fulmar ( <i>Fulmarus glacialis</i> ), Manx Shearwater ( <i>Puffinus puffinus</i> ), Shag ( <i>Phalacrocorax aristotelis</i> ), Cormorant ( <i>Phalacrocorax carbo</i> ), Little Gull ( <i>Larus minutus</i> ), Kittiwake ( <i>Rissa tridactyla</i> ), Black-headed Gull ( <i>Chroicocephalus ridibundus</i> ), Common Gull ( <i>Larus canus</i> ), Lesser Black-backed Gull ( <i>Larus fuscus</i> ), Herring Gull ( <i>Larus argentatus</i> ), Great Black-backed Gull ( <i>Larus marinus</i> ), Little Tern ( <i>Sterna albifrons</i> ), Roseate Tern ( <i>Sterna dougallii</i> ), Common Tern ( <i>Sterna hirundo</i> ), Arctic Tern ( <i>Sterna paradisaea</i> ), Puffin ( <i>Fratercula arctica</i> ), Razorbill ( <i>Alca torda</i> ), Guillemot ( <i>Uria aalge</i> ).		
<b>Conservation Objectives Targets and attributes</b>	<b>Potential adverse effects</b>	<b>Mitigation measures</b>

(summary)		
<p>In the absence of any site specific conservation objectives it is reasonable to apply those outlined above pertaining to other sites as species are listed within these sites are the same as those listed above.</p>	<p>An accidental pollution event during construction could affect surface water downstream in Dublin Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could potentially affect the quality the of intertidal/coastal habitats that support the special conservation interest bird species of the SPA. This could potentially affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p> <p>The introduction and/or spread of invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats not permanently or regularly inundated by seawater. This in turn could affect the use of habitat areas by birds and have long-term effects on the SPA populations.</p>	<p>Detailed pollution control measures to protect water quality are outlined within section 7.1.4 and include but are not limited to:</p> <p>the use of silt fences, silt curtains, settlement lagoons and filter materials.</p> <p>Provision of exclusion zones and barriers (e.g. silt fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the existing drainage systems and hence the downstream receiving water environment.</p> <p>Provision of temporary construction surface drainage and sediment control measures to be in place before earthworks commence. Fuels to be stored in bunded areas, management of construction related traffic etc.</p> <p>Implementation of SUDs when complete to control run off during the operation of the scheme.</p> <p>See the mitigation measures described in Section 7.1.4 to prevent the introduction and/or spread of invasive species which includes the carrying out of preconstruction surveys and the implementation of an Invasive Species management plan,</p>

**Overall conclusion: Integrity test**

The applicant determined that following detailed assessment of potential impacts and the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of these European sites in view of the conservation objectives of those sites.

Based on the information provided, I am satisfied that adverse effects can be excluded for these SPA sites that are remote from the proposed development site and that no effects of any significance will occur.

No habitat loss within the European designated sites will occur. Adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the adjacent watercourses and existing surface water pipes which drain directly into Dublin Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.

The spread of invasive species can also be controlled via mitigation measures, pre confirmatory surveys will be carried out in order to avoid or adequately treat or remove invasive plants prior to construction being carried out in accordance with an Invasive Species Management Plan.

Therefore, based on the information submitted, surveys carried out and analysis provided I am satisfied that no uncertainty remains.

**The proposed development would not delay or prevent the attainment of the Conservation objectives of any of these SPA sites in Dublin Bay and beyond.**

### **Potential for Adverse effects**

- 8.40. As outlined above the potential for adverse effects relates to the changes to water quality arising from pollution and sedimentation of watercourses arising at various locations and associated with various operations during the construction of the development and the deterioration of habitats and/or sedimentation arising from the spread of invasive plant species.
- 8.41. Additional potential impacts relate to disturbance arising from noise and vibration during construction works and the operational phase of the development. I have considered the potential for impacts to arise in relation to air quality impacts and dust deposition, however there are no Natura 2000 designated sites within the zone of influence for such impacts to occur and I am satisfied that impacts arising from air quality and dust deposition do not require any further assessment.
- 8.42. It is important to reiterate that no works will take place within the boundary of any Natura 2000 site and as such the potential for direct effects does not arise.
- 8.43. I will examine the foregoing impacts hereunder, the Board should note that designated sites will be considered and grouped under each relevant heading in order to prevent repetition. Potential impacts to water quality relate to all sites listed above.

### Noise & Vibration Disturbance

8.44. Potential adverse effects in relation to noise disturbance and vibration have been examined by the applicant within the NIS and are not considered to be likely to give rise to significant adverse effects due to the distance of Natura 2000 sites and known ex-situ sites from the proposed works. It is acknowledged within the NIS that there are a number of open amenity grasslands which would be suitable for foraging by overwintering birds which are outlined below, such lands are separated from the proposed works area by existing buildings;

- Belvedere Sports Ground
- Cabra / Pope John Paul II Park
- Ashtown Playing Pitches

8.45. The zone of influence in relation to noise impacts (during the construction phase) is stated to be within 300m of the proposed works. As aforementioned, there are no Natura 2000 sites within this radius. Impacts would therefore relate solely to ex-situ effects in relation to foraging birds. Significant adverse effects are not considered likely due to the availability of suitable foraging lands within the vicinity (and the wider area away from the proposed construction works) and the temporary nature of the proposed works in such an urbanised setting.

8.46. I note that Kingfisher are known to utilise the Tolka River however the nearest Natura 2000 site identified for this species is the River Boyne and Blackwater SPA which is c. 28 km from the proposed works. The likelihood for adverse effects to species associated with this designated site does not arise.

8.47. Effects arising from the construction would not be expected beyond 150m for mammals such as otter. I note that while the Proposed Scheme is within the potential foraging range of male otter, the Proposed Scheme is located in a different catchment to the Wicklow Mountains SAC which is the nearest designated SAC to the proposed scheme for which Otter is a QI, therefore, any otters present in the vicinity of the Proposed Scheme are not associated with the QI populations of any European site. As such no disturbance impacts arising from noise and vibration are considered likely.

8.48. No otters were recorded within the boundary of the proposed scheme but the applicant refers to a potential (degraded) otter spraint which was observed at the Tolka river road bridge underpass (structure BC1). It is further stated that the surrounding

footprints were of small mammals. A gelatinous spraint was also noted on the upstream side of structure BC1. The 2022 survey along the River Tolka noted two additional records alongside CBC0005AR001, where a single otter footprint and a degraded spraint - possibly otter were recorded. The surveys carried out by Triturus Environmental Ltd. in October and November 2020 also recorded regular otter sprainting at both survey sites on the River Tolka.

- 8.49. The Board should note that impacts to Otters not associated with a Natura 2000 designated site are considered within the EIAR of this report. Mitigation relating to the protection of otters is also provided for within the EIAR.

#### Habitat loss and fragmentation

- 8.50. This site will not be directly impacted by the proposed works and there will not be any loss of sites suitable to support breeding gull and wintering bird species. Therefore, there is no potential for impacts on SCI species associated with SPAs to occur as a result of habitat loss / fragmentation.

#### Habitat degradation/effects on QI/SCI species as a result of the spread of Invasive Plant Species.

- 8.51. The applicant has recorded five areas of non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations (Himalayan balsam) in close proximity to, the Proposed Scheme.
- 8.52. During construction these species could potentially spread or be introduced to terrestrial habitats located within downstream European sites via surface water features. As stated by the applicant, the introduction and/or spread of these invasive species to downstream European sites could potentially result in the degradation of existing habitats present, in particular coastal habitats which are not permanently or regularly inundated by seawater. These species may outcompete other native species present, negatively impacting the species composition, diversity and abundance and the physical structural integrity of the habitat. This in turn could undermine the conservation objectives of these European sites.
- 8.53. The Board should note as outlined above that the Proposed Scheme is hydrologically connected via a number of watercourses to Dublin Bay. Therefore, there is potential for the Proposed Scheme to undermine the conservation objectives of South Dublin

Bay and River Tolka Estuary SPA, North Bull Island SPA, North Dublin Bay SAC and South Dublin Bay SAC as a result of invasive species spread.

Habitat degradation/effects on QI/SCI species as a result of hydrological impacts

- 8.54. The release of contaminated surface water runoff and / or an accidental spillage or pollution event into any surface water features during construction, or operation, has the potential to affect water quality in the receiving aquatic environment. Such a pollution event may include: the release of sediment into receiving waters and the subsequent increase in mobilised suspended solids; and the accidental spillage and / or leaks of contaminants (into receiving waters). The associated effects of a reduction of surface water quality could potentially extend for a considerable distance downstream of the location of the accidental pollution event or the discharge.
- 8.55. The Proposed Scheme is hydrologically connected to Dublin Bay via the River Tolka, Liffey Estuary Upper and the Royal Canal, as well as a network of interconnecting and established surface or combined sewer/surface water pipes.
- 8.56. It is stated by the applicant that whilst it is unlikely to occur, this reduction in water quality (either alone or in combination with other pressures on water quality) could result in the degradation of sensitive habitats present within Dublin Bay. As a worst-case scenario there is potential to affect mobile SCI bird species that commute, forage and loaf in Dublin Bay. It could also negatively affect the quantity and quality of prey available to SCI bird species. These potential impacts could occur to such a degree that they result in significant effects which could have implications for the conservation objectives of North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA.
- 8.57. It is important to note that the applicant has considered impacts in relation to habitat degradation as a result of hydrogeological impacts and consider that the unmitigated hydrogeological Zol of the Proposed Scheme does not extend to any groundwater dependent terrestrial ecosystems linked to European sites. It is concluded that the Proposed Scheme does not have the potential to result in habitat degradation of the

qualifying / special conservation interest species of any European site as the result of hydrogeological impacts.

#### In combination Effects

- 8.58. In combination effects are examined within section 9 of the NIS submitted. The proposed works were considered in combination with all plans and/or projects with the potential to impact upon the European sites outlined above, I have also considered the North West Irish Sea SPA in my consideration of in combination effects. Such plans and projects included any national, regional and local land use plans or any existing or proposed projects (that were in place at the time of lodgement of the Proposed Scheme for the consideration of the Board) that could potentially affect the ecological environment within the Zol of the Proposed Scheme and are listed in Table 33 of the NIS submitted. Each plan and project has been individually considered for any potential in combination effects, these considerations are detailed in table 34 of the NIS submitted.
- 8.59. It is important to note that since the submission of the application the Dublin City Development Plan 2022-2028, Fingal County Development Plan 2023-2029 and the Climate Action Plan 2023 have been adopted. I have had regard to these plans for the purpose of assessing the potential for cumulative effects in relation to the proposed development and note that no new issues arise within the development plan that would have a materially different impact upon the cumulative impacts assessed by the applicant under the previous development plan. In addition, I have reviewed the Planning Register in relation to proposed developments since the lodgement of the application and am satisfied that there are no new applications which would materially impact the proposed scheme in terms of cumulative impacts.
- 8.60. It is important to note that the applicant has the potential for in combination effects with regard to other significant infrastructure projects in and around the city such as Metrolink. All such projects have been considered in the context of in combination effects and are outlined in table 35 of the NIS submitted. It is important to note that projects such as Metrolink must comply with all applicable planning and environmental approval requirements and be in accordance with the objectives and policies of the relevant land use plans (Development Plans, Local Area Plans etc.). Considering the environmental protection policies included within the relevant land use plans, the

range of mitigation measures included in the Proposed Scheme to avoid significant impacts and that alone the Proposed Scheme will not adversely affect the integrity of any European sites, I am satisfied that the Metrolink and other such projects will not act in combination with the Proposed Scheme to have an adverse effect on the integrity of any European sites.

- 8.61. In the interest of clarity, it is important to note that all other bus connect routes have been considered in the assessment of cumulative effects. Given the nature of the proposed works and the standard nature of the proposed mitigation measures, I am satisfied that the proposal will not give rise to cumulative impacts of any significance.
- 8.62. The in-combination assessment within Section 9.3 of the NIS submitted has concluded that there is no potential for adverse effects on the integrity of any European sites including those within its Zol, to arise as a consequence of the Proposed Scheme in-combination with any other plans or projects.
- 8.63. Mitigation measures detailed in Section 7 of the NIS and summarised in table 10 below, will ensure that no adverse effects on European sites integrity will arise from the implementation of the Proposed Scheme.
- 8.64. The implementation of, and adherence to, the policies and objectives of the relevant plans set out in Section 9.2 of the NIS and those of the current Dublin City Development Plan 2022-2028 will ensure the protection of European sites across all identified potential impact pathways and will include the requirement for any future project to undergo Screening for Appropriate Assessment and/or Appropriate Assessment, as appropriate.
- 8.65. As the Proposed Scheme will not affect the integrity of European sites within the Zol of the Proposed Scheme, and given the protection afforded to European sites under the overarching land use plans, I am satisfied that there will be no adverse effects on the integrity of any European sites to arise as a consequence of the Proposed Scheme acting in-combination with any other plans or projects.
- 8.66. Overall, I am satisfied that the NIS and supplementary information provided as part of the application has examined the potential for all impact mechanisms in terms of the conservation objectives of the North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey

Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrrough SPA and North West Irish Sea SPA. The potential for adverse effects can be effectively ameliorated by both design-based and applied mitigation measures related to surface water quality and spread of invasive species.

### **Mitigation Measures and Monitoring**

- 8.67. A summary of mitigation measures is presented in the tables above. Full details are provided in the NIS, Construction Management Plan and Invasive Species Management Plan and summarised below.
- 8.68. Specific mitigation measures are proposed for a number of locations and refer to the construction compound BL1 at Old Navan Road which is in close proximity the Tolka\_040. It is proposed to install silt curtains / bunding or infiltration trenches on the northern boundary of Construction Compound BL1 to prevent any silty water or spillages from reaching the waterbody. Fuels will be stored as close as possible to the southern boundary of Construction Compound BL1, where an existing low wall will act as a bund to protect surface water drains in the Old Navan Road to the south. All other potentially risk activities or storage of materials will similarly be located at the southern boundary of the site.
- 8.69. For Construction Compound BL2 at Junction 6 to the west of the M50, it is stated that the existing wall will provide some measure of protection to any surface water connections within the car park; this wall will remain in place for the duration of the construction programme. To the north of the compound site, the surface water system will be protected through the use of filter drains or silt curtains at locations where there is potential for silty water runoff to those drains (the grassed area slopes towards the drains for a short distance). In addition, the surface water manhole in the grassed area will be clearly marked and protected from any possible contamination through the use of bunding or temporary sealing.
- 8.70. In relation to the Tolka Bridge extension the following is proposed:
- All construction machinery operating near to the waterbody will be mechanically sound to avoid leaks of oils, hydraulic fluid, etc.

- Reinstatement of any banks affected during construction works near a watercourse will be reinstated back to pre-development conditions;
- Any bank-side clearance in the immediate area of the crossing will be kept to a minimum and adequate measures will be put in place to control or minimize the risk of siltation. This may include such measures as:
  - bunding and diversion of site runoff to settlement ponds,
  - stripping of topsoil. See Soils in A Guide to Landscape Treatments for National Road Schemes in Ireland (National Roads Authority, 2005), and where necessary, surfacing of site with granular material; and,
  - covering of temporary stockpiles.

8.71. Sheet piling will be installed on the land side of the existing gabion baskets to protect the Tolka\_040 from the construction works and to retain the existing bank during excavation works for the bridge foundations. The sheet piles will be driven and installed in accordance with Inland Fisheries Ireland (IFI) Guidelines on Protection of Fisheries During Construction Works Adjacent to Waters (IFI 2016). Consultation was undertaken in June 2021 with IFI, and the works are deemed out of channel.

In relation to BR02 Mill Road Bridge and RW07A and RW07B Pedestrian Ramps at Mill Road, I note the following from the Applicant's NIS:

- The structures to the northern side of N2 Dual Carriageway and the temporary working areas are in close proximity to the Tolka\_040 and so there is increased risk of silty water or concrete washings reaching the Tolka\_040 across surfaces or via local surface water drains.
- In order to avoid or minimise impacts, local surface water drains will be bunded on the construction activity side and silt fences erected around the extent of the works to prevent accumulated silty water from leaving the site in the event of rainfall. All other generic measures relating to the storage of soil, materials and fuel as set out in the SWMP will also be applied here.

8.72. I consider that all measures proposed are implementable and will be effective in their stated aims. Furthermore, an Ecologist will be employed to ensure that measures are implemented as prescribed. A summary of mitigation measures is presented in Table

10 below this list is not exhaustive and I refer the Board to the NIS for full details of the extensive list of mitigation measures proposed.

**Table 10: Summary of Mitigation Measures to avoid adverse effects on European Sites**

Measures to protect surface water quality and groundwater quality during construction:	Use of silt traps, silt fences, bunds for run off to collect in, good construction practice in relation to concrete use and wash out on site. The use of bunded areas, secured areas for hazardous materials, fuels, lubricants and use of spill kits. The use of onsite treatment for surface water runoff, use of settlement tanks/ponds and management of same. Monitoring of water bodies.
Measures to protect surface water quality during operation:	Sustainable urban drainage systems (SUDS) including bioretention areas and filtration drains water butts and permeable paving.
Measures to eradicate/control the spread of non-native invasive species	Preconstruction survey, Implementation of an Invasive species management plan and post construction monitoring programme.

**Appropriate Assessment Conclusion: Integrity Test**

8.79. In screening the need for Appropriate Assessment, it was determined that the proposal to develop a multimodal sustainable transport route had the potential to result in significant effects on North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland’s Eye SPA, Lambay Island SPA, Murrough SPA

and North West Irish Sea SPA, and that Appropriate Assessment was required in view of the conservation objectives of those sites.

8.80. Following a detailed examination and evaluation of the NIS all associated material submitted with the application as relevant to the Appropriate Assessment process and taking into account submissions of third parties, I am satisfied that based on the design of the proposed development, combined with the proposed mitigation measures, adverse effects on the integrity of North Dublin Bay SAC, South Dublin Bay SAC, Howth Head SAC, Howth Head Coast SPA, Rockabill to Dalkey Island SAC, Lambay Island SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Dalkey Islands SPA, Malahide Estuary SPA, Rockabill SPA, Baldoyle Bay SPA, Rogerstown Estuary SPA, Skerries Islands SPA, Ireland's Eye SPA, Lambay Island SPA, Murrough SPA and North West Irish Sea SPA, can be excluded with confidence in view of the conservation objectives of those sites.

**My conclusion is based on the following:**

- 8.81. A detailed assessment of all aspects of the proposed development that could result in significant effects or adverse effects on European Sites within a zone of influence of the development site.
- 8.82. Consideration of the conservation objectives and conservation status of qualifying interest species and habitats
- 8.83. A full assessment of risks to special conservation interest bird species and qualifying interest habitats and species
- 8.84. Complete and precise survey data and analysis of wintering birds. The proposed development site has been scientifically verified as not being of significance to or an area favoured by SCI bird species at any stage of the wintering or summer seasons.
- 8.85. Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.
- 8.86. The proposed development would not undermine the favourable conservation condition of any qualifying interest feature or delay the attainment of favourable conservation condition for any species or habitat qualifying interest for these European sites.

## 9.0 Environmental Impact Assessment

### Introduction

- 9.1. The application is accompanied by an Environmental Impact Assessment Report (EIAR) which was prepared by an environmental team led by Jacobs on behalf of the applicant. This EIA section of the report should, where appropriate, be read in conjunction with the relevant parts of the Planning Assessment above.
- 9.2. The application falls within the scope of the amending 2014 EIA Directive (Directive 2014/52/EU) on the basis that the application was lodged after the last date for transposition in May 2017. The application also falls within the scope of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, as the application was lodged after these regulations come into effect on 1st September 2018.
- 9.3. The impact of the proposed development is addressed under all relevant headings with respect to the environmental factors listed in Article 3(1) of the 2014 EIA Directive. The EIAR sets out a case regarding the need for the development (Section 2.0). The EIAR provides detail with regard to the consideration of alternatives in Section 3. An overview of the main interactions is provided at Section 21.3. Details of the consultation entered into by the applicant with Dublin County Council and other prescribed bodies as part of the preparation of the project are also set out in Section 1.7 of the EIAR and the Public Consultation Report 2018-2020 which is a separate document.
- 9.4. Article 3 (2) of the Directive requires the consideration of the effects deriving from the vulnerability of the project to risks of major accidents and / or disasters that are relevant to the project concerned. The potential for 'unplanned events' is addressed in Section 20 of the EIAR.
- 9.5. The potential for 'flooding' is considered in Section 13 which relates to the Water Environment. I consider that the requirement to consider these factors under Article 3(2) is met.
- 9.6. In terms of the content and scope of the EIAR, the information contained in the EIAR generally complies with Article 94 of the Planning and Development Regulations 2001, (as amended), all studies informing the EIAR are up to date and recently acquired.

Additional pre-construction surveys will be required in order to provide up to date information in relation to invasive species, mammals, bats and birds, however such issues can be adequately dealt with by condition.

- 9.7. It is important to note at the outset that the proposed development under consideration within this application does not cross international boundaries. Thus, there are no transboundary effects.

### **Alternatives**

- 9.8. The consideration of Alternatives is documented within Section 3 of the EIAR submitted. I note that alternatives were considered at three levels, Strategic alternatives, route alternatives and design alternatives. The Board should note that concerns were raised within the third party submissions in relation to the alternatives considered. It was contended that the applicant had failed to consider other viable alternatives as suggested by third parties.

### Transit Alternatives

- 9.9. It is stated that the appropriate type of public transport provision in any particular case is predominately determined by the likely quantum of passenger demand along the particular public transport route. With this in mind the applicant considered the option of constructing a light rail service which would cater for a passenger demand of between 3,500 and 7,000 per hour per direction (inbound and outbound journeys). Based on the number of passengers predicted to use the new service it was considered that there would be insufficient demand to justify a light rail option. The light rail option would also require significantly more land take, necessitating the demolition of properties.
- 9.10. Metro alternative was also considered and as in the case for light rail, there is a higher capacity requirement for such solutions it was therefore not considered to be suitable for this route. In addition, the development of an underground metro would not remove the need for additional infrastructure to serve the residual bus needs of the area covered by the Proposed Scheme. Heavy rail alternatives carry in excess of 10,000 people each direction each hour and was considered an unsuitable solution.
- 9.11. Demand management in the form of restricting car movement or car access through regulatory signage and access prohibitions, to parking restrictions and fiscal measures

(such as tolls, road pricing, congestion charging, fuel/vehicle surcharges and similar) were all considered as alternatives to the proposed scheme. However, it is stated that in the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users, such measures would not work in isolation to address car journeys into and out of the city and would not encourage people onto alternative modes.

- 9.12. Whilst technological alternatives are becoming increasingly advanced, the use of electric vehicles does not address congestion problems and the need for mass transit.

#### Route Alternatives

- 9.13. The applicant outlines within section 3.3 of the EIAR that alternative route options have been considered throughout the design development in response to consultations held with the public. The route selection process is outlined in Section 3.3.1 of the EIAR, I note that 90 route sections were considered for the Blanchardstown to M50 East section, 53 for the M50 to Cabra section and 85 for the Cabra to Liffey section.

- 9.14. The Stage 1 assessment considered engineering constraints, high-level environmental constraints and an analysis of population catchments. Numerous links forming part of the 'spider's webs' were not brought forward to the Stage 2 assessment due to space constraints, lack of appropriate adjacent linkages to form a coherent end-to-end route, unsuitability of particular routes, the need for significant land take from residential properties and related construction GHG impacts.

- 9.15. Following completion of the Stage 1 initial appraisal, the remaining reasonable alternatives options were progressed to Stage 2 of the assessment process. These routes were then considered against the following criterion: economy, safety, integration, accessibility and social inclusion and environment. Under each headline criterion, a set of sub-criteria were used to comparatively evaluate the options which included soils and geology, hydrology, flora and fauna, potential archaeological, architectural and cultural heritage impacts, air quality, noise and vibration and landscape and visual.

- 9.16. Following stage 2 sifting process 9no. viable routes were identified. Having regard to the information submitted it is clear that the applicant has considered a significant number of options for the proposed scheme and has been responsive to consultations held and concerns raised by the public.

- 9.17. In relation to design considerations, I note that section 3.2.8 outlines technological advances in relation to travel however, whilst advances do provide new opportunities in the transport area, particularly in the area of information provision, they do not yet provide viable alternatives to the core need to provide for the movement of more people by non-car modes, including the provision of safe, segregated cycling facilities. Accordingly, there are no viable technological alternatives to meet the transport needs of this sector of the city. Therefore, in terms of design I am satisfied that the proposed infrastructure is a reasonable option that will meet the needs of transport in the city at present and into the future.
- 9.18. Thus, having regard to the information provided by the NTA in relation to the alternatives considered I am satisfied that a significant number of options have been considered in detail and that the process undertaken by the applicant has been a robust assessment of alternative options having regard to environmental considerations and the stated Project Objectives, which are considered to be reasonable. I agree that the routes chosen are the ones which best meet these objectives. I also accept that the consideration of options within the selected route corridor and the strategy for key infrastructure provisions was a rigorous process. I therefore generally concur with the reasons for choosing the preferred alternatives as presented in the EIAR.

### **Population and Human Health**

- 9.19. Chapters 10 and 11 of the EIAR consider the impacts to population and human health as a result of the proposed development. I note from the EIAR that impacts to population were considered under two sub assessments, i.e Community Assessment and Economic Assessment. The Study area was informed by the CSO parish boundaries and are listed within section 10.2.1.1. of the EIAR. Economic study area is defined as individual businesses within the identified community areas that could be potentially impacted by the development as a result of displaced traffic.
- 9.20. Human health is considered in the context of the overall health status of the population within the study area, social inequalities, as this can be a determinant of health, and the overall exposure of the population in the study area to environmental impacts, such as the level of exposure to certain pollutants, noise, travel patterns and behaviour in the context of the proposed development.

- 9.21. It is important to note at this juncture that impacts to communities arising from traffic, air quality, noise and vibration and visual and landscape are considered within the relevant sections of the EIAR submitted and within the planning assessment above, and in the interest of conciseness will not be repeated hereunder. This Section of my report should therefore be read in conjunction with the relevant sections mentioned.
- 9.22. Issues raised in this context within the submissions received, relate to accessibility to properties both residential and commercial. Dublin City Council have requested that access to commercial properties in terms of drop off and unloading areas are provided for and I note the NTA's response in this regard is to work with the council to provide unloading in areas where no designated space is available.
- 9.23. Private residents are concerned about the functionality of their properties in terms of access, noise and loss of privacy. Concerns are also raised in relation to air quality and the impact to travel times as a result of diversions during construction or rerouted traffic.

#### Baseline conditions

- 9.24. In terms of baseline conditions, it is of note that Dublin has a better health profile than average for Ireland with lower mortality rates. Based on available monitoring data, levels of air pollution are almost entirely within the EU limit values for NO<sub>2</sub> and Particulate Matter (PM). However, there is a relatively high prevalence of exposure to excessive traffic noise, particularly at nighttime for properties close to the Proposed Scheme corridor. In terms of the economic baseline, it is of note that the proposed scheme will pass circa 300 commercial businesses.

#### Potential Impacts

- 9.25. Overall construction impacts relating to construction noise, dust, traffic disruption will be temporary and short term in terms of the magnitude of affect and are largely mitigated without any significant residual effects.
- 9.26. Impacts are examined in detail within the relevant sections hereunder. However, it is important to note at this juncture that no significant offsite health risks are expected as a result of the construction or operation of the development. Temporary disturbances given the nature of the works will not extend in the long-term post construction. I am

satisfied that such impacts will not result in significant effects and can adequately be dealt with by way of mitigation.

- 9.27. Thus, having regard to the information provided within the EIAR and the submissions received, I consider the disruption to traffic as a result of both the construction of the development and the operation of the development to be the greatest impact to population and human health. Such impacts give rise to driver frustration and impeded access at times and there is a potential for increases to traffic on roads catering for diverted traffic. It must be stated however, that the proposed development will also see positive impacts which are expected during the operation of the proposed development when it is anticipated that more people will cycle, therefore improving physical health. An increase in bus use will see a reduction in car emissions along the route and will also have a positive impact on residents' overall health.
- 9.28. Reduced community severance will also have a positive impact on the local population in terms of overall health outcomes, as will improved accessibility to health care providers via a significantly improved bus service.

#### Mitigation Measures

- 9.29. In relation to traffic disruption, I note that the applicant proposes to implement traffic management plans and protective measures to ensure that pedestrians and cyclists are provided with safe routes during the construction phase, and I further note that access to Connolly Hospital will be maintained and the Construction Traffic Management Plan will set out measures to minimise any delay for emergency response vehicles, specifically ambulances, in accessing the hospital, the Board should note that there are other accesses available for emergency vehicle into the hospital so significant impacts are not anticipated in this regard This mitigation is expected to reduce the risk of delay to be comparable to baseline conditions where existing traffic conditions can cause delays to emergency access.
- 9.30. I further note that measures are proposed to facilitate deliveries to commercial premises both during construction and once the development is operational. Whilst such measures are not a perfect solution for all concerned, on balance I am satisfied that the applicant has adequately addressed the issue of traffic disruption by way of accommodation works during the operational phase of the development and mitigation during construction and I whilst I acknowledge that the inconvenience created by these

diversions will cause annoyance to road users at certain times, it is for a limited period of time and the effect to population and human health is not a significant long term effect.

9.31. Mitigation for adverse psychosocial responses to the Construction Phase are stated to include providing the public with sufficient information to enable people to plan their days, journeys and activities around the construction works. The NTA will manage and take responsibility for community liaison and engagement during this time.

9.32. In relation to the permanent diversion of traffic to other routes as a result of the development, this will have a negative, moderate and long-term effect due to increases in traffic on some of the surrounding road network. It is anticipated that the improved access to a new multimodal route will reduce overall car dependence and therefore reduce the number of cars accessing the surrounding road network.

### 9.33. Conclusion

9.34. I have considered all of the written submissions made in relation to population and human health and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on population and human health can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on population and human health can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

### **Traffic and Transport**

9.35. Section 6 of the EIAR examines the impact of the proposed scheme on traffic. For the purpose of assessment, the proposed route has been considered under five no. sections as follows:

- Section 1 – N3 Blanchardstown Junction to Snugborough Road;
- Section 2 – Snugborough Road to N3 / M50 junction;
- Section 3 – N3 / M50 junction to Navan Road / Ashtown Road junction;

- Section 4 – Navan Road / Ashtown Road junction to Navan Road / Old Cabra Road junction; and
- Section 5 – Navan Road / Old Cabra Road junction to Ellis Quay.

### 9.36. Baseline Conditions

9.37. Overall cycling infrastructure along the Proposed Scheme currently covers 48% cycle priority outbound (11% cycle track, 37% non-segregated), with 38% inbound (7% segregated, 31% non-segregated). Bus services along the Proposed Scheme currently operate within a constrained and congested environment, with approximately with 40% priority outbound and 10% priority inbound on the corridor.

9.38. The following section of this report will outline the base line conditions in relation to the relevant sections mentioned above.

#### Section 1 – N3 Blanchardstown Junction to Snugborough Road:

9.39. This section of the Proposed Scheme will commence Junction 3 (Blanchardstown / Mulhuddart) southbound off-slip from the N3, and routes via Old Navan Road onto the R121. The route then proceeds on the R121 Blanchardstown Road South into the Blanchardstown Shopping Centre, via the R121 / Blakestown Way junction. Passing between the Retail Park North and the Blanchardstown Centre, the route then turns south-east on the L3020 to the R843 Snugborough Road.

9.40. This section includes the following:

- Major road around the shopping centre and towards Snugborough road.
- Footpaths – mix between 3 and 1.5m wide.
- Several controlled pedestrian crossings.
- Cycle facilities are present along most of the route and are c. 1.5m wide, comprising of a mix of segregated and advisory and combined in bus lanes.
- No cycle facilities on the L3020, the road that connects the Retail Park North with R843 Snugborough Road and provides access to Retail Park East
- Cycle parking for hire bikes.
- Intermittent bus lanes in both directions.
- 10 bus stops along the route.

- Junctions are described in section 6.3.2.4 and include:
  - N3 Navan Road Southbound Off-Slip
  - Navan Road / Mulhuddart N3 Slip Road three-arm signalised junction.
  - R121 Blanchardstown Road North / Navan Road four-arm signalised junction
  - R121 Blanchardstown Road South / N3 off-slip four-arm signalised junction
  - R121 Blanchardstown Road South / Retail Park Delivery Area priority junction
  - R121 Blanchardstown Road South / Blakestown Way priority roundabout:
  - Access Road / West Car Park / Commercial access priority junction
- Parking detailed in Section 6.3.2.5 of EIAR, approximately 7000 spaces are available at the Blanchardstown Shopping Centre and no on street or loading bays.

#### Section 2 – Snugborough Road to N3 / M50 junction

9.41. Section 2 is approximately 2.0km in length, and begins on R843 Snugborough Road, and joins the N3 Navan Road at Junction 2. The Proposed Scheme then runs south along N3 Navan Road, before leaving the N3 and passing through the M50 interchange on Navan Road to reach the R102 Dunsink Lane signalised junction. Prior to passing through the interchange, the southbound scheme loops north along River Road past Connolly Hospital and Castleknock health and leisure village, before joining Navan Road. This section includes the following:

- Intermittent footpath along this section of the scheme.
- Several controlled pedestrian crossings.
- There are no existing cycling facilities.
- There are no bus priority measures along Section 2 of the Proposed Scheme, apart from a short section of bus lane on the southbound N3, to the north of the southbound on-slip at Junction 2 Bus Stop Facilities.

- 2 no. bus stops along the route.
- The R843 has a wide single lane in either direction, flaring to two lanes on the approach to the junctions. It is subject to a speed limit of 60km/h and has a total carriageway width of 10.0m.
- Junctions:
  - N3 Eastbound off-slip (River Road) / Connolly Hospital Access signalised junction;
  - N3 Navan Road / N3 Eastbound off-slip (River Road) signalised junction;
  - N3 Navan Road / Old Navan Road signalised junction;
  - N3 Navan Road / M50 Junction 6 Interchange; and
  - N3 Navan Road / Auburn Avenue signalised junction. There is currently no on-street parking or loading bays along Section 2 of the Proposed Scheme.

### Section 3 N3 / M50 Junction to Navan Road / Ashtown Road junction

9.42. This section is approximately 2.0km in length, and runs along R147 Navan Road, apart from a short section where the route detours to run along the slip roads that serve Navan Road Parkway Rail Station. Section 3 of the Proposed Scheme primarily passes along inter-urban dual carriageway, with no or limited pedestrian or cycle facilities.

- Continuous footpath alongside the northern carriageway of the R147 Navan Road between R102 Dunsink Lane and the Navan Road Parkway.
- Westbound there is a continuous shared pedestrian / cyclist facility, between Ashtown Road and the Navan Road Parkway slip-road.
- At the Navan Parkway slip-road, the footpath becomes a joint footpath and cycleway. This runs up the northbound off-slip and down the northbound on-slip, terminating at the filling station, where the pedestrian route leaves R147 Navan Road and enters Castleknock Manor.
- Several controlled pedestrian crossings.

- Various shared cycle and pedestrian facilities and combined bus lane and cycle facilities.
- Navan Road Parkway rail station parking for 32 bicycles.
- Various sections of bus priority measures.
- 6 bus stops
- Main junctions:
  - R147 Navan Road / Hotel access priority junction;
  - R147 Navan Road / Morgan Place junction and Filling Station Accesses;
  - R147 Navan Road / Navan Road Parkway grade-separated interchange;
  - R147 Navan Road / Phoenix Park Avenue / Phoenix Industrial Park junctions; and
  - R147 Navan Road / Ashtown Road priority roundabout.

Section 4 Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road junction

9.43. Section 4 of the Proposed Scheme is approximately 2.5km in length and runs along R147 Navan Road. This section is primarily suburban in nature, with well-spaced side road junctions (both priority and signalised), developments taking direct access onto the N3, and houses with frontage access on both sides of the route. For the purpose of identifying existing pedestrian facilities the applicant has subdivided this section into three areas as follows:

- Ashtown Road to Baggot Road
- Baggot Road to Nephin Road
- Nephin Road to Old Cabra Road

Ashtown Road to Baggot Road

- On the south side of R147 Navan Road, there is a shared footpath / cycleway between Ashtown Road and Darling Estate. Beyond this, a continuous footpath continues to Baggot Road. On the northern side of R14 Navan Road, there is a continuous footpath for the full length of this section.

- Various signalised pedestrian crossing points.

#### Baggot Road to Nephin Road

- Continuous footpaths on both sides of R147 for the extent of this section
- Various signalised pedestrian crossing points.

#### Nephin Road to Old Cabra Road

- There are continuous footpaths on both sides of R147 for the extent of this section
- Various signalised pedestrian crossing points.

#### Cycle facilities include:

- A shared facility for pedestrians and cyclists of 2.0m – 3.0m in width on the south side of R147 Navan Road between the Darling Estate entrance and the R147 Navan Road / Ashtown Road roundabout; and
- A combination of on-road mandatory and advisory cycle lanes of 1.5m in width, which run along the eastbound and westbound carriageways for the remainder of Section 4 of the Proposed Scheme, with the exception of a 200m eastbound section to the east of Nephin Road where the cycle lane is amalgamated into a combined cycle and bus lane before becoming a distinct cycle lane again.
- Cycle parking for 26 bicycles.
- Further parking for 20 hire bicycles.

#### Bus

- Intermittent bus priority measures
- 16 Bus Stops

#### Main Junctions:

- R147 Navan Road / Kempton Avenue signalised junction;
- R147 Navan Road / Ashtown Grove priority junction;
- R147 Navan Road / Kinvara Avenue / Baggot Road signalised junction;
- R147 Navan Road / Nephin Road signalised junction;

- R147 Navan Road / Skreen Road priority junction;
- R147 Navan Road / Hampton Green / Primary Care Centre junctions;
- R147 Navan Road / Cabra Library signalised junction; and
- R147 Navan Road / R805 Old Cabra Road signalised junction.

### Parking

- 24 existing parking / loading spaces.

### Section 5 Navan Road / Old Cabra Road Junction to Ellis Quay

Section 5 is approximately 1.9km in length and consists of R805 Old Cabra Road, R805 Prussia Street, R805 Manor Street, R805 Stoneybatter and Blackhall Place. The study area also includes Brunswick Street North, King Street North, Blackhall Street and Queen Street, where changes to the road network, and new cycle facilities are proposed.

- There are continuous footpaths alongside both the north and south sides of the route between R805 Old Cabra Road and R148 Ellis Quay.
- Numerous signalised pedestrian crossings.
- There are continuous cycle lanes of 1.5m in width on both sides of Old Cabra Road between R147 Cabra Road and the R101 North Circular Road within Section 5 of the Proposed Scheme. All of these cycle lanes are advisory, with the exception of the first 140m section to the east of R147 Cabra Road, where the cycle lanes are mandatory.
- On the southern part of Section 5 of the Proposed Scheme there is a continuous advisory cycle lane of 1.25m in width that runs northbound from 30.0m north of Manor Place to the R101 North Circular Road signalised junction
- 8 cycle parking spaces on Prussia Street, 30 at Blackhall Place, further 34 spaces outside City Cycles at the junction with Oxmantown Lane.
- Intermittent bus priority measures.
- 14 bus stops
- Main junctions:

- R805 Old Cabra Road / Glenbeigh Road priority junction;
  - R805 Old Cabra Road / Cabra Drive priority junction; and
  - R805 Old Cabra Road / Supermarket access priority junction.
- 145 existing parking / loading spaces

#### Potential impacts

9.44. For the purpose of the assessment of potential impacts the applicant has considered the scheme under the 5 sections outlined above. I have reviewed the information in relation to all 5 sections and in the interest of conciseness I will consider potential impacts in relation to the individual mode, i.e. walking, cycling, bus, private car and parking in relation to both the construction and operational phases of the development in its entirety hereunder.

#### Construction

9.45. In relation to the full proposed scheme, I note that 3 construction compounds are proposed and the scheme will employ 250 people which will rise to c. 300 at the peak of construction. The haulage of materials is expected to be minimal with the hourly projected number stated as c.36 two way HGV trips. The applicant has identified haul routes as follows:

- M50 Motorway;
- N3
- R147 Regional Road; and
- R804 & 805 Regional Roads.

9.46. It is important to note at the outset that the proposed works will be carried out over a 24 month period and will be shorter in duration in some areas.

9.47. In terms of impacts, it is stated that traffic flows on all routes and at site compounds and works areas will be managed by the construction traffic management plan. Temporary diversions, and in some instances temporary road closures, may be required where a safe distance cannot be maintained to undertake works necessary to complete the Proposed Scheme. This in my view is reasonable having regard to the long-term benefits which will be derived for the proposed project.

- 9.48. All road closures and diversions will be determined by the NTA, who will liaise with the local authority and An Garda Síochána, as necessary. The need for temporary access restrictions will be confirmed with residents and businesses prior to their implementation. Impacts in relation to the foregoing are not stated to be significant or long term.
- 9.49. Disruptions to pedestrian and cycle movement will also occur on a temporary basis as works proceed, however alternative routes and access will be provided as required. Similarly, it is stated that bus stops may require temporary relocation, but access will be retained in order to ensure continuity in the service. The magnitude of effects in this regard is expected to be slight and temporary.
- 9.50. Parking and loading locations may be temporarily impacted by construction activities along the Proposed Scheme corridor, but it is also stated that alternatives will be provided.
- 9.51. In general, I note it is stated that significant impacts due to general traffic redistribution away from the direct study area are not anticipated as traffic flows are to be maintained in both directions. Access for general traffic to existing residential and commercial units immediately adjacent to the Proposed Scheme is to be accommodated throughout the Construction Phase.
- 9.52. Overall, the magnitude of impacts associated with the construction of the proposed scheme range between 'Negative, Slight and Temporary' to 'Negative, Moderate and Temporary'.

#### Operational Phase

- 9.53. In terms of the operational impacts, I note that the assessment of impacts relates to both the functionality of the infrastructure to be provided in terms of journey times, accessibility etc, and the qualitative nature of the infrastructure, i.e whether there are direct crossing, tactile paving, dropped kerbs etc. The applicant has developed a set of criteria for each mode which are outlined in tables 6.20 and 6.23 for pedestrians and cyclists respectively. Bus infrastructure is examined in relation to the frequency of service to be provided and the infrastructure such as shelters, seating, accessible kerbs etc.

9.54. In relation to parking the applicant has clearly outlined the number of spaces to be lost at each location which is set out in paragraph 9.62 below and has provided a justification for such losses and in some cases has provided alternative solutions. The applicant has also examined parking and loading requirements for businesses in the area. It is of note that Dublin City Council have raised concerns in relation to the loss or relocation of parking and has requested that the scheme provides for set down and loading areas to serve local businesses. Some residents have also raised concerns within the third party submissions in relation to the loss of parking on street, particularly in the Manor Street section of the scheme. It is important to note in this regard that no significant effects are expected to arise in relation to parking, specifically in the Stoneybatter area of the scheme. The applicant has demonstrated that adequate car parking has been retained within the on-street locations (as detailed below).

#### Pedestrian Infrastructure.

9.55. In terms of operational impact in relation to pedestrian infrastructure, it is important to note at the outset that all impacts to all sections of the proposed scheme are expected to be positive and long term. This is as a result of the proposed improvements to the existing pedestrian facilities in the form of additional crossing locations, increased pedestrian directness, provision of traffic calming measures to reduce vehicle speeds, improved accessibility and increased footpath and crossing widths. I note that all facilities have been designed in accordance with the principles of DMURS and the National Disability Authority (NDA) 'Building for Everyone: A Universal Design Approach' (NDA 2020) with regards to catering for all users, including those with disabilities.

#### Cycle Infrastructure

9.56. Cycle infrastructure impacts are also considered to be positive and long term in terms of magnitude of effects. A number of submissions raised concerns in relation to junction layouts, cycle lane widths, treatment of cycle lanes at bus stops, the turning movements provided for cyclists at junctions. Fingal County Council also raised concerns in relation to the provision of a cycle lane along the N3 whereby traffic speeds are high.

9.57. Similar to the foregoing, all issues have been examined in detail within the assessment section of this report and will not be repeated hereunder, save to say that I am satisfied

that the design approach to this infrastructure has been adequately justified by the applicant and I am satisfied that no significant negative impacts will arise in this regard. The use of dedicated cycle lanes, quiet roads in the case of cyclist diversions from the main route and the segregation of general traffic over significant distance of the route will provide for a significantly enhanced experience for cyclists over that currently available. I am satisfied that the applicants have examined the potential for impacts to arise in relation to the proposed cycle infrastructure and have examined all reasonable alternatives in this regard also.

9.58. The magnitude of impacts in relation to cycling are stated to be positive and significant.

#### Bus Infrastructure

9.59. It is proposed that there will be a total of 55 bus stops along the entire length of the scheme which will be an overall increase of 5 stops. The layout of new bus stops is considered to better serve the existing and future catchment and be closer to existing and new pedestrian crossing facilities for improved convenience. The magnitude of effects arising from the operation of the proposed new bus stops is expected to be positive and very significant.

9.60. Similar to the foregoing, infrastructure, issues have been raised in relation to the relocation of some bus stops, the accessibility of bus stops for people with disabilities and the visually impaired and the provision of shelters. See assessment section 7 Project Design of this report above for detailed assessment of bus shelter accessibility.

9.61. Based on the information submitted and the NTA responses to the concerns raised as outlined within the assessment section of this report, I am satisfied that the applicant has adequately justified the proposed alterations to bus stops. I also note that all bus stops will have accessible kerbs and real time information and the majority will also have shelters which is currently not the case at all stops. Overall, the accessibility and reliability of the bus service will be significantly improved to that available currently. Such improvements will have a positive and long-term impact for patrons and will not result in any significant negative effects.

#### Parking

9.62. As mentioned above, concerns have been raised by third parties in relation to the removal of on street car parking along the route of the proposed scheme particularly

within the Manor Street section of the scheme. Each section of parking to be removed or added has been examined individually as follows:

Section 1 – N3 Blanchardstown Junction R843 Snugborough Road

- 9.63. There are no on-street parking spaces or loading bays along this section of the Proposed Scheme.

Section 2 –Snugborough Road to N3 / M50 junction An additional 7 spaces to be provided along this section of the route.

- 9.64. There are no on-street parking spaces or loading bays along this section of the Proposed Scheme.

Section 3 – N3 / M50 junction to Navan Road / Ashtown Road junction

- 9.65. There are no on-street parking spaces or loading bays along this section of the proposed route.

Section 4 – Navan Road / Ashtown Road junction to Navan Road / Old Cabra Road junction

- Removal of 19 spaces on the south side of R147 Navan Road, between Nephin Road and Baggot Road. All houses have private driveways, impact of change is stated to be Negative, Slight and Long-term effect.
- Loss of 1 no. space on the north side of R147 Navan Road, to the west of Our Lady's Church, which has a private car park.
- There are no on-street loading bays between Ashtown Road and Old Cabra Road. Loading must occur inside premises or outside bus lane restriction hours.

Section 5 – Navan Road / Old Cabra Road junction to Ellis Quay

- Removal of 10 spaces at the east side of the R805 Prussia Street, to the north and south of St Joseph's Road. There are 125 similar spaces within 200 metres of this location.
- Reduction from 58 to 16 and an additional 2 no. disabled spaces on Manor Street between Aughrim Street and Brunswick Street North and removal of

1 no. space on Manor Place. There are a 100 similar spaces within 200 metres.

- Rearrangement of 4 loading bay on Manor Street between Brunswick Street North and Aughrim Street, to provide 2 loading bays and 5 parking spaces.
- Loss of 11 parking spaces on Aughrim Street, located in a triangle of lane between Aughrim Street and Manor Place.
- Loss of 6 spaces out of an existing 26 on Blackhall Place, between King Street North and Blackhall Street. There are 110 pay & display / permit spaces within 200m of this location.
- Loss of 8 spaces at Benburb Street and Oxmantown Lane.
- On Brunswick Street North, there are 6 pay & display / permit spaces, and two Loading spaces in a bay on the south side of the street, close to the George's Lane junction. It is proposed to remove all of these spaces to allow the provision of a two-way cycle track. A new loading bay, three spaces long, will be created on King Street North, which will offset this loss.
- Provision of 11 additional spaces on Blackhall Place.
- Loss of 3 no. spaces on Queen Street.

9.66. The scheme will result in a total loss of 74 spaces along this section.

9.67. The Proposed Scheme will formalise the parking arrangements at the aforementioned locations, and will improve the street environment, particularly for pedestrians and cyclists and enable a significantly improved and more efficient bus service along this route. Given the availability of equivalent types of parking along adjacent streets within 200m of these locations, the overall impact of this loss of parking is considered to have a 'Negative, Moderate and Long-term' effect. Whilst I acknowledge the concerns raised, I am satisfied that no significant effects arise in this regard and the proposed scheme will provide for a significantly enhanced public realm which will encourage a modal shift to more active modes of travel.

#### Benefits of the scheme

9.68. In terms of the modelled benefits of the proposed scheme, I draw the Board's attention to section 6.4.6.2.1 of the EIAR in which the movement of people is assessed. The

modelling examines the potential for modal shift in the years 2028 and 2043 in relation to the am and pm peak times. The most significant shift is seen in the increase in people walking and cycling. In the year 2028 during the am peak it is predicted that walking and cycling will see an increase of 53%. Private car use for the same year is predicted to decrease by 14%. The PM peak for the same year is predicted to have a similar modal shift with 109% people travelling outbound by bus, 58% of people walking outbound, and a 18% reduction in the private car.

- 9.69. Modelled modal shifts for the year 2043 also see a significant increase in people walking and cycling with a 39% increase in the am peak hour and an 38% increase in the pm peak hour and a greater uptake of public transport with an additional 79% passengers in the am peak hour and 146% in the PM peak hr.
- 9.70. The Board should note that individual routes have been examined in terms of efficiencies and overall impacts to service are examined in detail within chapter 6 of the EIAR.
- 9.71. The overall magnitude of the forgoing modelled changes is positive, significant and long term. It is clear from the information provided that the proposed development will be a significant piece of infrastructure that will assist in the reduction of GHG in Dublin City and will have a significantly positive impact on the sustainability of the city.
- 9.72. It is clear that the improvements proposed will create the conditions for a modal shift to more sustainable modes of travel. Improved bus times and scheduling, travel information and accessibility to the bus infrastructure are positive changes that are supported at both a national and local level in terms of policy.
- 9.73. It must be clarified that the initial modelling for the years 2028 and 2043 were based on current metrics for population, traffic levels etc. I note that the applicant has resilience tested the proposed scheme in relation to population and traffic growth. The results of which demonstrate that the proposed scheme will have adequate capacity to cope with such changes without impacting the reliability of the service.

#### General traffic impacts

- 9.74. Given the improvements to bus priority, walking and cycling as a result of the Proposed Scheme, there will be an overall reduction in operational capacity for general traffic along the direct study area. This area will see a reduction in general traffic numbers of

between -195 and -1,097 combined flows, from Slight to Profound magnitude of impacts. Positive impacts are predicted on 19 links, most noticeably on Manor Street, Stoneybatter, Old Cabra Road and Prussia Street.

- 9.75. In addition to the general traffic flow reductions occurring along the direct study area, there are reductions in general traffic along certain road links within the indirect study area, these are outlined in table 6.64 and will see a reduction between -104 and -814. I note that the biggest reductions are predicted on Blanchardstown Road South, North Circular Road, Castleknock Road, Blackhorse Avenue and Ratoath Road
- 9.76. However, there are other link roads which will experience an increase in traffic, at the AM peak hour, these roads are outlined in table 6.63 of the EIAR. It is stated that the increase in traffic on these roads will increase by between 137 cars per hour and 486 during the peak AM hour.
- 9.77. As a consequence of the increases in traffic, the roads listed in table 6.63 have been examined in terms of their operational capacity including junction capacity to accommodate the additional traffic. I note that the modelling was based on the worst performing arm of each junction as a worst case scenario assessment.
- 9.78. The Board should note the threshold to trigger a detailed assessment of these routes is a 5% increase, only one junction; the N3 junction 2 was predicted to experience such an increase, at 5.4%. This is primarily due to increases in inbound traffic on Snugborough Road to the north-east, and on the N3 northbound off-slip.
- 9.79. The junctions associated with the N3 junction 2 include R843 Snugborough Road / L3020 signalised junction; and R843 Snugborough Road / Waterville Road roundabout, both of which are being modified by Fingal County Council at present. The modifications to these junctions were modelled and results show that the proposed scheme will have a negligible effect on the turning flows at these junctions. I am satisfied therefore that the proposed scheme will not have a significant impact on traffic flows within the route.
- 9.80. The Board should note that AM peaks that increase or decrease on link roads, generally follow the same increase or decrease pattern in the PM scenario.

9.81. Concerns have been raised by third parties in relation to a number of streets which include the following, the board should note additional routes are mentioned in submissions and will be considered within the assessment section of this report:

- Aughrim Street – Am peak -235
- Connaught Street – AM peak +368
- Fassaugh Avenue – AM peak +351
- Fassaugh Road – Am peak +360
- Glenbeigh Road – AM peak -167
- Annamoe Road - AM peak - 161
- Annamoe Terrace- AM peak - 161
- St Peters Road – AM peak -226

9.82. As previously mentioned PM peak traffic flows are similar to AM. It is clear from the above that more surrounding link roads will actually experience a reduction in traffic as a result of the scheme. Increases are minimal and it is clear that changes in traffic do not give rise to significant negative long term impacts. The overall magnitude of impacts in ranges between positive significant to positive slight.

9.83. I refer the Board to Section 6.4.6.2.8.9 of the EIAR in which a summary of general traffic impacts is provided. Overall, it is determined that there will be a Negative, Slight and Long-Term impact from the redistributed general traffic as a result of the Proposed Scheme. The Board should note that no junctions are predicted to experience significant effects. Overall, whilst I acknowledge the concerns raised within the submissions in relation to the redistributed traffic implications, I am satisfied that the applicant has carried out a robust and detailed assessment of the surrounding road network and the capacity of the network to absorb an additional diverted traffic as a result of the proposed scheme.

#### Mitigation

9.84. Traffic and transport mitigation measures are set out in section 6.5 of the EIAR. It is stated within this section that construction related mitigation will be included within the CEMP and the implementation of this document will ensure disruption and nuisance are kept to a minimum during the Construction Phase. I note that the CEMP has regard

to the guidance contained in the TII Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan, and the handbook published by Construction Industry Research and Information Association (CIRIA) in the UK, Environmental Good Practice on Site Guide, 4th Edition (CIRIA 2015).

- 9.85. A detailed Construction Traffic Management Plan will be prepared and included in the CEMP, and subsequently implemented, by the appointed contractor prior to construction, including Temporary Traffic Management arrangements prepared in accordance with Department of Transport's 'Traffic Signs Manual, Chapter 8 Temporary Traffic Measures and Signs for Roadworks'. The CTMP will be agreed with the road authority and will include measures to minimise the impacts associated with the Construction Phase upon the peak periods of the day.
- 9.86. No mitigation measures are proposed for the operation of the proposed scheme. Residual impacts remain as stated above and will not be significant.

#### Conclusion

- 9.87. I have considered all of the written submissions made in relation to traffic and transport, and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on traffic and transport can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on traffic and transport can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise. I am also satisfied that the long term operational impacts will be positive for public transport users, cyclists and pedestrians and will have an overall positive impact on the well being of people circulating within the area of the proposed scheme.

#### **9.88. Air and Climate**

- 9.89. Chapter 7 and 8 of the EIAR submitted address the potential for impacts to arise in relation to Air Quality and Climate.

#### Baseline Conditions

##### Air Quality

9.90. The key pollutants considered relevant to the proposed development are identified as:

- Nitrogen Dioxide
- Dust
- Particulate Matter PM<sub>10</sub> and PM<sub>2.5</sub>
- Greenhouse gases; Carbon Dioxide (CO<sub>2</sub>), Sulphur Hexafluoride (SF<sub>6</sub>)

9.91. The EIAR submitted outlines, within table 7.2, the upper limits for the above pollutants and within Sections 7.2.2, 7.2.2.2 and 7.2.2.3, the relevant international and domestic legislation and policy pertaining to same. Baseline air quality is examined within section 7.3.2 of the EIAR and baseline line climate conditions are examined in section 8.4. Emissions are expected to arise in relation to both the construction and operation phases of the proposed development and will be examined in the context of the proposed mitigation measures hereunder.

9.92. In relation to baseline levels, I note that the most recent annual report at the time of assessment is Air Quality in Ireland 2022 (EPA). The Board should note that the EIAR refers to Air Quality in Ireland, 2019. I have reviewed the most recent report and have taken it into account in my assessment hereunder. It is stated that a long term assessment of air quality was undertaken to inform the EIAR and data from the Swords, Ballyfermot, Rathmines, Blanchardstown and Winetavern Street stations were reviewed for the period 2015-2019. The result of these trends in relation to NO<sub>2</sub> are outlined in table 7.14 of the EIAR.

9.93. In addition, the EPA has gathered NO<sub>2</sub> data using the passive diffusion tube methodology in proximity to the Proposed Scheme. I note that the applicant outlines that diffusion tube data was collected over a seven month period (15 November 2019 to 8 June 2020), however due to COVID-19 impacts on the baseline traffic environment, the final two data sets (16 March 2020 to 8 June 2020) are considered non 'typical' baseline data (full lockdown was implemented on 27 March 2020), and therefore, are not included in the baseline data set. This a reasonable approach to data interrogation and I am satisfied that the applicant has utilised the most relevant data in the assessment of air quality. Diffusion tube monitoring data is outlined in table 7.16 of the EIAR.

- 9.94. In relation to data collection, the Board should note that under the TII Air Quality Guidelines (TII 2011), a minimum of one-month baseline monitoring is required, ideally extending to at least three months, the applicants have collected four months of pre covid baseline data.
- 9.95. Air quality monitoring locations are outlined in table 7.17 and results are outlined in table 7.18. I note that the highest four-month average concentration was recorded at a roadside location at 38 Blackhall Place, which was the closest monitoring location to the City Centre. Such occurrences demonstrate the urgent need for an overall improvement in air quality in the city.

#### Potential Construction Impacts

- 9.96. During the Construction Phase of the Proposed Scheme, works will involve predominately utility diversions, road widening works, road excavation works (where required), road and junction reconfiguration and resurfacing works, public realm improvements including landscaping, and construction access routes including movement of machinery and materials within, and to and from, the Construction Compounds along the Proposed Scheme.
- 9.97. For the purposes of the EIAR five individual construction sections are set out. Sections may be completed simultaneously and combined in certain areas as follows:

#### Section 1: N3 Blanchardstown Junction to Snugborough Road:

- Section 1a: Old Navan Road;
- Section 1b: Blanchardstown Slip Roads;
- Section 1c: Blanchardstown Road;
- Section 1d: Blakestown Roundabout;
- Section 1e: Blakestown Roundabout to Blanchardstown Shopping Centre Roundabout 1;
- Section 1f: Blanchardstown Shopping Centre Roundabout 1;
- Section 1g: Blanchardstown Shopping Centre Roundabout 1 to Roundabout 2, including Bus Depot;
- Section 1h: Blanchardstown Shopping Centre Roundabout 2;

- Section 1i: Blanchardstown Shopping Centre Roundabout 2 to Blanchardstown Road;
- Section 1j: Blanchardstown Shopping Centre Roundabout 2 to Roundabout 3;
- Section 1k: Blanchardstown Shopping Centre Roundabout 3; and
- Section 1l: Blanchardstown Shopping Centre Roundabout 3 to Snugborough Tie In.

Section 2: Snugborough Road to N3 / M50 Junction:

- Section 2a: N3 Dual Carriageway Slip Roads;
- Section 2b: N3 Dual Carriageway to Navan Road;
- Section 2c: N3 Structure Widening; Central Reservation;
- Section 2d: N3 Structure Widening; Mill Road South;
- Section 2e: N3 Structure Widening; Mill Road North;
- Section 2f: Old Navan Road to M50 Roundabout; and
- Section 2g: M50 Roundabout.

Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction:

- Section 3a: M50 Roundabout to Railway Station;
- Section 3b: Railway Station to Ashtown Road Roundabout; and
- Section 3c: Ashtown Road Roundabout.

Section 4: Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction:

- Section 4a: Ashtown Road Roundabout to Baggot Road;
- Section 4b: Baggot Road to Skreen Road;
- Section 4c: Skreen Road to Railway Line; and
- Section 4d: Ratoath Road Junction.

Section 5: Navan Road / Old Cabra Road Junction to Ellis Quay:

- Section 5a: Railway Line to Aughrim Street;
- Section 5b: Aughrim Street to Brunswick Street;

- Section 5c: Blackhall Place;
- Section 5d: Queens Street;
- Section 5e: Brunswick Street North;
- Section 5f: Kings Street North;
- Section 5g: Blackhall Street;
- Section 5h: Georges Lane; and
- Section 5i: Off-line Sections

9.98. In terms of effects, it is considered that demolition, earthworks, construction and track out activities will give rise to dust. I note that the applicant has had regard to IAQM guidance in relation to the identification of the magnitude of effects which are defined in the said guidance document.

9.99. The magnitude of dust emissions is defined in relation to each specific activity, as follows:

- Demolition – small, as the total building volume is likely to be less than 20,000m<sup>3</sup> and there is low potential for dust release as only partial demolition of Tolka River Bridge and Mill Road Bridge will take place.

9.100. The dust emission magnitude for the proposed demolition activities following mitigation will not be significant.

- Earthworks – large impact as the area is in excess of 10,000m<sup>2</sup> and there may be between 5 and 10 heavy earth moving vehicles active at any one time.

9.101. The mitigated dust emission magnitude for the proposed earthwork activities required for the Proposed Scheme will not be significant.

- Construction works – the area is limited and works relate to the laying of paving and hard landscaping along the route. No buildings are proposed as part of the construction works.

9.102. The magnitude of mitigated effects to ecological receptors and human health arising from construction works will not be significant.

- Trackout movements – medium impact, such activities may comprise of 10 to 50 HDV (heavy duty vehicles) outward movements in any one day during

peak construction activity with surface material with a low potential for dust release.

9.103. The magnitude of mitigated effects to human health and ecological receptors in relation to track out movements will not be significant.

9.104. Construction traffic – 22 public roads are identified as required construction access routes where construction traffic will be permitted to travel along. An additional 720 HDV vehicles per day associated with construction traffic along each road including construction deliveries and earthworks material haulage are added to the base traffic volumes. I note the estimated construction traffic volumes are based on the peak construction period volumes and are therefore a worst-case assumption, the Board should note that hourly estimates set out within the Traffic and Transport Section of the EIAR are stated to be 36 two-way HGV movements in total which would equate 1152 movements over the working hours of 07:00 to 23:00, however deliveries to the site will only occur during certain hours and it is therefore reasonable to expect a significant reduction on that to c. 720 movements or less as stated above. I also note that the applicant considers that the scheme will be constructed in phases with lower volumes.

9.105. The potential air quality impacts associated with additional construction traffic is examined in relation to NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Modelled receptors are outlined in table 2.2 within Appendix A7.1 Volume 4 of the EIAR. Most impacted receptors are outlined in table 7.25 and 7.26 of the EIAR and refer to receptors with non-negligible impacts. Overall, it is stated within the EIAR that impacts relating to construction traffic pre mitigation are expected to be neutral and short term. I note that all pollutants modelled are within the upper-level thresholds permitted and do not exceed the upper limit. In terms of ecological receptors, I note that impacts in this regard are expected to be 'Negative, Slight and Short-Term'.

9.106. Impacts arising in relation to air during the operational phase of the development pre mitigation are expected to be neutral and long term in relation to humans and negative, slight and long term in relation to ecological receptors.

#### Mitigation

9.107. Mitigation measures proposed during the construction phase of the development relate to the suppression of dust. Such measures include road sweeping, water misting

or spraying during dust generating activities, use of tarpaulins when transporting materials and use of site hoardings of 2.4 metres in height. Significant residual impacts are not expected to arise.

#### Mitigation for Operational phase

9.108. No mitigation is proposed in relation to the operational phase of the proposed scheme and no residual impacts are expected.

9.109. I have considered the potential for cumulative impacts to arise in relation air quality and having regard to the information submitted and given the lack of any significant impacts associated with either the construction phase of the development or the operational phase of the proposal, I am satisfied that proposed development would not give rise to significant cumulative impacts in relation to air quality.

9.110. I further acknowledge that a significant number of submissions raised concerns regarding increases in air pollution as a result of the development. Particular concerns were raised in relation to the removal of trees and the movement of road space closer to properties. Whilst I acknowledge the concerns of third parties, the information provided in this regard is clear, robust and detailed and I am satisfied that based on the information provided, notwithstanding the concerns raised within submissions, significant impacts will not occur in relation to air pollution. It is clear that the proposed development will have an overall positive/neutral impact on air quality as a result of a modal shift to more sustainable forms of travel within the route and with the introduction of electric bus fleet.

9.111. Based on the information submitted, I am satisfied that the proposed development will not give rise to significant impact to air quality and will have a positive impact in terms of the long-term outlook.

#### Climate

9.112. It is important to note at the outset when considering the proposed development in the context of climate, that Bus Connects is identified within the Climate Action Plan 2023 (CAP 23) as a key project that will contribute to the reduction in GHG within Irelands cities. The CAP 23 supports the reallocation of road space to public transport and active travel and seeks to advance the bus connects programme in all 5 cities, over the coming years.

9.113. Impacts to climate are considered within section 8 of the EIAR and are considered in the context of GHG emissions relating to land use change and construction, traffic related emissions and operational related emissions. Recent weather patterns and extreme weather events reported by Met Eireann, have been considered in the context of climate change locally.

#### Potential Construction Impacts

9.114. It is important to note at the outset that the key phases of the GHG generation are the embodied carbon of the construction materials and the construction activities, which, when combined, account for 72% of all carbon emissions. Pre-construction together with construction waste is expected to account for 28% of all emissions.

9.115. The applicant states that the Proposed Scheme is estimated to result in total Construction Phase CO<sub>2</sub>eq<sup>1</sup> emissions of 7699 tonnes embodied CO<sub>2</sub>eq for materials over a 24-month period, equivalent to an annualised total of 0.006% of Ireland's national GHG emissions in 2019 or 0.010% of Ireland's non-ETS 2020 target.

9.116. In order to provide clarity to the Board, it is important to consider the proposed construction related emissions in the context of CAP23 and the agreed Sectoral Emission Ceilings for transport projects within this document. In the context of the 2021-2025 carbon budget period, the proposed development represents 0.01725% of the transport emission ceiling for the period. It is likely that construction will extend into the following carbon budget period of 2026-2030 and as such the proposal would represent 0.0384% of this period's emission ceiling allocation (if it were to be constructed fully in this period).

9.117. It is important to reiterate at this juncture that the aforementioned climate emissions relate solely to embodied carbon during the construction phase of the development.

9.118. In terms of identifying the magnitude of effect arising from the construction phase of the development I note that in the absence of the agreed CAP 23 Sectoral Emission Ceilings at the time of submission of the application, any increase in GHG had to be considered significant, as such the applicant has stated impacts arising from the construction phase of the development are negative, significant, and short term. In an attempt to provide some context to the carbon emissions figures provided, the

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<sup>1</sup> Carbon Dioxide Equivalent

applicant states that the construction impacts are equitable to the construction phase of a three-bed housing development of 154 units. I consider this to be a useful comparison in order to visualise the quantum's referred to.

9.119. Thus, whilst I acknowledge the justification in relation to the stated magnitude of effects to climate arising from the construction phase of the development, I am satisfied that having examined the carbon emission equivalent of the proposal in the context of the Sectoral Emission Ceilings set out in CAP 23, that the construction phase of the proposed development would not give rise to any long term significant climate impacts and has been adequately assessed and quantified within the EIAR .

9.120. In relation to mitigation measures proposed for the construction phase of the development I note that the applicant proposes a number of measures which include the reuse of materials where feasible, the sourcing of materials locally and the replacement of concrete containing Portland cement with concrete containing ground granulated blast furnace slag.

#### Potential Operational Impacts

9.121. With regard to the operational phase of the development it is important to note that climate is heavily influenced by GHG emissions and transport emissions are a significant factor in the level of GHGs released into the atmosphere. I draw the Boards attention to section 8.4.3 of the EIAR in which it is stated that private cars accounted for 73.7% of all road trips in 2019 whilst public transport accounted for 6.5% which I note is an increase of 3% from the previous year. It is stated within the EIAR that transport is the second highest emitter of GHG nationally and currently accounts for 20.3% of the national GHG output, with cars accounting for 57.4% of total road transport GHG emissions. I draw the Boards attention to CAP 23 in which updated figures are provided. Latest figures state that transport is responsible for 15.7% of the national GHG output and importantly has been the fastest growing source of GHG emissions over the past three decades, showing a 112% increase between 1990 and 2021.

9.122. Whilst transport emissions associated with the construction phase will increase slightly, it is important to consider the overall impact of the development during both the construction and operational phase. The proposed development is expected to be in use for 60 years and will support the delivery of an efficient, low carbon and climate

resilient public transport service, which supports the achievement of Ireland's emission reduction targets. It is stated that the proposal has the potential to reduce GHG emissions equivalent to the removal of approximately 14,700 and 14,800 car trips per weekday from the road network in 2028 and 2043 respectively. This represents a significant contribution towards the national target of reducing car emissions by 1.87MtCO<sub>2</sub>eq<sup>2</sup> by 2025 and 3.79 MtCO<sub>2</sub>eq by 2030 as set out in tables 15.4 and 15.5 of CAP 23. I note from the information submitted that haulage and heavy goods road freight emissions are not projected to decrease and are essentially outside of the scope of this development.

9.123. In relation to impacts to sequestered carbon I note a number of trees (circa 413 no.) will be removed as part of the earth works and preparation stage of construction and third parties have expressed their concerns in this regard. Whilst I acknowledge the concerns raised; I note it is proposed to carry out extensive replanting throughout the scheme in relation to trees, hedging, ornamental planting and grasses. Such measures when taken in the context of the proposed construction works will have a neutral and positive effect on the sequestering of carbon over the life of the development.

9.124. In summary of the foregoing, the applicant has stated that the magnitude of effects arising from the operation of the development will be 'Neutral and Permanent', mitigation measures are proposed for the operation of the scheme and relate to activities relating to the maintenance of the scheme. Mitigation as outlined in relation to the construction phase in terms of reuse of materials and replacement of Portland cement with concrete containing ground granulated blast furnace slag.

9.125. Having regard to the information submitted and the requirements outlined within CAP 23, I am satisfied that all impacts in relation to climate have been robustly assessed and the applicant has considered all aspects of the development in a detailed manner within both sections 7 and 8 of the EIAR and has provided extensive information in support of the analysis submitted within the relevant appendices to this document. I am also satisfied that the proposal is supported by the recently adopted CAP 23 which was not finalised prior to the submission of this application but is nonetheless essential to the assessment of the development in the foregoing context.

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<sup>2</sup> Million Tonnes of Carbon Dioxide Equivalent

9.126. It is important to state at this juncture that in considering the impact on climate I have had regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 which requires Ireland to achieve a 51% reduction in emissions by 2030 (relative to 2018 levels) and a 20% reduction by 2025 and am satisfied that the proposed development which proports to achieving an overall reduction in CO<sub>2</sub>eq will have a positive impact on achieving the overall reduction required for Ireland.

### Conclusion

9.127. In conclusion, I have considered all of the written submissions made in relation to air quality and climate and the relevant contents of the file including the EIAR. I am satisfied that the potential for direct or indirect impacts on air quality and climate can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on air quality and climate can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise, given that overall risks subject to mitigation being implemented are predicted as being negligible.

### **Noise and Vibration**

9.128. Chapter 9 of the EIAR examines the potential for impacts to arise in relation to noise and vibration. It is important to note at the outset that a number of third-party submissions have raised concerns in relation to operational noise which could impact residential amenity. The following section of this report will examine the potential for such impacts to arise in relation to the proposed development.

### Baseline Conditions

9.129. In order to establish baseline conditions, the applicant utilised Traffic Noise level monitoring data which is recorded and mapped by the EPA. The applicant also carried out independent noise surveys in the form of attended and unattended surveys at various locations along the route. Attended surveys were undertaken at a total of 18 locations along the length of the Proposed Scheme during July and September 2020. An unattended survey (one week in duration) was made at two locations during September 2020 to supplement the attended survey locations and the desktop baseline noise study.

9.130. I refer the Board to Section 1.3 of appendix A9.1 of the EIAR which outlines specific survey dates and times for each location and results. Baseline data results identify road traffic as the dominant noise experienced along the route during both daytime and nighttime hours. Average background noise during daytime hours varies along the route with some areas experiencing higher background noise levels than others. Results indicate exceedances in existing ambient noise levels at various locations along the route. This can be attributed to traffic volumes along the route. Ambient noise recorded at the locations outlined within the appendix of the EIAR as referred to above ranged between 55dB and 74dB with the average at attended surveying between 60dB and 68dB. It is clear from the range recorded that the study area is a high noise environment. High noise levels were also recorded during nighttime hours. Noise during this period is also dominated by road traffic.

9.131. I draw the Boards attention to Section 9.3 of the EIAR in which a description of baseline noise is provided for each section of the proposed scheme and the nearest noise sensitive locations identified. Noise sensitive locations comprise of dwellings, hotels, churches and educational facilities. The noise sensitive receptors are located between 5 and 45m away from the route. Noise experienced at some of these locations are as high as 74dB during day time hours and 64dB at night.

9.132. Vibration surveys were also conducted at various locations and results indicate that vibration levels associated with a heavily trafficked urban – suburban road with a mix of fleet inclusive of dedicated bus lane result in negligible vibration levels at the edge of the road both in terms of human perception and building response.

#### Potential impacts of noise and vibration

9.133. Noise generation will arise in relation to construction works and the operation of plant during the construction phase. Increased noise levels are also anticipated due to the increase in buses utilising the route during operational phase. There is also a potential for noise disturbance to arise in areas which cater for diverted traffic both during construction and permanently during the operation of the development.

9.134. The applicant has examined all sources of noise associated with the construction and operation of the development. The EIAR examines each construction activity at specific locations and considers the impact in terms of a range of distances from the proposed works at noise sensitive locations. I draw the boards attention to tables 9.28

– 9.48 in which each construction activity is outlined in terms of noise emissions relative to the distance from NSLs. In the absence of mitigation, it is clear from the tables that noise exceedances will occur in relation to all activities at the closest distances to NSLs and at some other distances to varying degrees of intensity. The magnitude of impacts ranges from slight to very significant, on a temporary basis and over the short term during both daytime and nighttime hours.

9.135. Whilst there are exceedances expected in relation to unmitigated noise emissions from construction activity, in the majority of instances as shown within the aforementioned tables, a number of significant exceedances are expected along the proposed route whereby high noise levels of up to 83dB are expected arising from road widening and utility diversion works. Activities relating to the construction of boundary wall is also expected to give rise to noise emissions of c. 80dB at NSL's at various sections along the route.

9.136. Construction traffic has also been modelled in terms of noise impacts and it is expected that there will be 360 HGV movements (180 vehicles) over a peak construction day. It is intended to carry out the development in a phased manner.

9.137. Modelling in relation to noise emissions from traffic distribution has been carried out at numerous locations outlined in section 9.4.3.4 of the EIAR which will not be repeated hereunder. Modelling results during the assessed construction year 2024, indicate that the highest potential noise impacts are calculated along Georges Lane due to traffic redistribution during construction works along the Proposed Scheme. The change in traffic noise is defined as 'moderate' with the traffic noise level calculated at the closest NSLs along these three roads categorised as 'medium'. The overall impacts are determined to be 'Negative', 'Moderate and 'Temporary'.

9.138. I draw the boards attention to table 9.55 of the EIAR in which construction impacts in relation to all other relevant roads are considered and range between negative 'slight /moderate' and 'short to medium term'.

9.139. Construction compounds are considered within table 9.39 of the EIAR in terms of noise generation. Unmitigated noise emissions from these compounds are expected to range between 50 and 78dB and is likely to be exceeded at distances of up to 15m from the works boundary in the absence of any noise mitigation.

9.140. In relation to piling activities, I note that bored piling rigs will be used in the widening of the Tolka River Bridge. Noise levels are typically in the range of 52 to 80dB in relation to this activity. Daytime exceedances are likely within 20 metres of such works in the absence of any mitigation.

9.141. Potential impacts arising from vibration are associated with the groundbreaking activities and piling. I note from the information submitted that the magnitude of effects associated with this activity is stated as negative, slight to moderate and temporary at distances of 10m from the activity. Beyond 50m from this type of activity, impacts are stated to be reduced to imperceptible to slight and temporary.

9.142. I further note that the applicant states that all construction works are orders of magnitude below limits values associated with any form of cosmetic or structural damage for structurally sound or protected or historical buildings or structures. Based on the information submitted I am satisfied that a robust and detailed assessment of vibration has been carried out by the applicant and that no significant effects arise from the proposed works.

9.143. In terms of the operational phase of the development, as mentioned above, noise impacts have the potential to arise from changes in traffic volumes, private traffic will reduce on the route and there will be an increase in buses along the route. In addition, redistributed traffic onto surrounding local road network will also have the potential to affect noise levels.

9.144. Traffic flows have been modelled over an extensive study area across the Dublin Region as part of the traffic assessment for the Proposed Scheme. The noise impact assessment has focused on all modelled roads within 1km of the Proposed Scheme red line boundary to assess the potential noise impacts on the surrounding road network.

9.145. Along the majority of roads off the Proposed Scheme within the 1km study area, impacts as a result of traffic redistribution are determined to be indirect, positive, imperceptible to minor, and short to medium term, to negative, slight to moderate, and short to medium term once the Proposed Scheme becomes operational. The following roads were examined in detail and the magnitude of effects ranged from slight to moderate and short to medium term:

- Georges Lane

- Leix Road
- Erris Road
- Swilly Road
- Nephin Road
- Annaly Road
- Old Navan Road

9.146. I note from the EIAR that in the year of opening, 2028, the highest daytime potential noise impacts are calculated along Georges Lane, Nephin Road and Old Navan Road.

9.147. Noise levels along these roads are expected to range between 60 to 64dB. Such noise levels are typical of urban/suburban environments and I am satisfied that significant effects will not arise.

9.148. Overall, I note from the information submitted that the initial overall increase in noise on roads within 1km will range between 3 and 4 dB which in terms of magnitude of effects is minor. The Board should also note that the long term changes i.e design year 2043, are also not expected to be significant with the overall impact determined to be negative, slight and long term.

9.149. Based on the information submitted and the nature of the proposed works and the limited traffic flow redistribution it is reasonable to expect impacts of insignificance.

#### Mitigation Measures

9.150. Mitigation measures are included within the Construction Management Plan and are discussed in Section 9.5 of the EIAR. It is clear that the largest magnitude of effects arises at distances of 15 metres from the proposed works and relate to construction related activities whereby concrete is to be removed and replaced and road widening is to be carried out. Other significant impacts arise in relation to works being carried out during evening and weekend hours whereby the upper limit for ambient noise is lower.

9.151. Thus, whilst mitigation is proposed in relation to all construction related works, of particular note are the measures relating to general road works, road widening and diversion, works relating to quiet streets, site compounds and boundary treatment. I note in this regard that machinery will be fitted with acoustic exhausts and within

enclosure panels which will reduce noise by up to 10dB. Mufflers will be fitted to pneumatic concrete breakers and tools, noisy machinery will be placed away from NSLs and sensitive boundaries. Compressors will be sounded by acoustic lagging or enclosed within the acoustic enclosure. Screens will be used to dampen noise near NSLs when breakers or drill bits are used. Such measures can also reduce noise levels by up to 10dB.

9.152. Works will be carried out largely within daytime hours, however it will be necessary to carry out some works infrequently during nighttime hours. The applicant states that cumulative noise impacts will be carefully considered and avoided in order to protect NSLs. It is intended that construction activities will be scheduled in a manner that reflects the location of the site and the nature of neighbouring properties.

9.153. The type of works and the duration will be communicated to residents at all times so that residents are aware of the type of work to be carried out and can plan accordingly. Noise monitoring will ensure that any exceedances are addressed without delay. Similarly works which may give rise to vibration will only be carried out during daytime hours and monitoring will ensure exceedance of upper limits do not arise.

9.154. Overall mitigation measures are expected to reduce noise levels by 10dB. As outlined above, baseline daytime noise levels are c. 67dB and evening baseline levels are 65dB. Following mitigation, the highest predicted construction noise levels are between 67 to 73 dB LAeq,T at the closest properties impacted by the most intrusive works. The higher impacts will be at those properties where the prevailing baseline is below the specific predicted construction works noise levels. No significant effects are expected during daytime hours post mitigation. Significant residual effects only remain in relation to nighttime and weekend hours whereby upper limit thresholds are lower at these times.

9.155. Overall, it is expected that in most instances noise generated by works will assimilate into the existing background noise levels and will not give rise to significant impacts. In addition, as the proposed development is a linear route works will move continuously therefore being temporary in nature at any location along the route.

#### Residual Impacts

9.156. Significant to moderate residual impacts remain during nighttime and evening hours in relation to the following works at locations between 15m and 20m from the works:

- Quiet street treatment works,
- Construction compound
- Boundary wall construction works
- Urban realm
- Sheet piling
- Retaining wall works

9.157. I note that the applicant has had regard to the DMRB Noise and Vibration (UKHA 2020) in cases of moderate to major magnitude of impacts, the duration of works determines the overall significance rating. As part of the mitigation measures, the durations advised in the DMRB Noise and Vibration (UKHA 2020) will be followed, where feasible, to reduce overall significance effects (i.e. scheduling works to occur for periods of less than ten days/nights over 15 consecutive day/night periods and less than 40 days over six consecutive months where significant effects are identified). Once the CNL and duration of works is considered in line with the DMRB Noise and Vibration (UKHA 2020) all key Construction Phase residual noise levels are not considered to be significant.

9.158. As outlined above significant impacts do not arise in relation to vibrations and as such significant residual impacts will not occur. In addition, the magnitude of effects arising from the operation of the development is 'positive' to 'negative' and 'slight', mitigation measures are therefore not proposed in relation to the operational phase of the development.

### Conclusion

9.159. I have considered all of the written submissions made in relation to noise and vibration and the relevant contents of the file including the EIAR. I am satisfied that the potential for direct or indirect impacts on noise and vibration can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts in relation to noise and vibration can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

## **Archaeology, Cultural Heritage & Architectural Heritage**

9.160. Section 15 & 16 of the EIAR submitted examines the potential for impacts to arise in relation to Archaeology, Cultural Heritage and Architectural Heritage.

### Baseline Conditions - Archaeology & Cultural Heritage

9.161. In terms of baseline conditions with regard to monuments, archaeology and cultural heritage I refer the board to Section 15.3 of the EIAR in which the historical baseline conditions are outlined. The proposed route prior to the 20<sup>th</sup> Century comprised of rural lands which joined with the city landscape in which the street pattern that currently exists had emerged by the 18<sup>th</sup> Century.

9.162. In overview of the scheme, I note that 43 Protected structures or groups of Protected Structures were identified. Of these, 21 will share a common boundary with the Proposed Scheme. One of these structures, The Law Society of Ireland on Blackhall Place (DU018-020177) is of high sensitivity.

9.163. Five post boxes of architectural significance were identified in the study area, as outlined in Section 16.4.3.6.1 and described in Appendix A16.2 Inventory of Architectural Heritage Sites in Volume 4 of this EIAR. These post boxes are stated to be of Medium Sensitivity. Direct Construction Phase impacts are anticipated at three post-boxes. The grass verge around the post box on Kempton Avenue (CBC0005PB001) is to be altered and the post box may be relocated to provide a clear footpath. The post box at the junction of Glenbeigh Road and Old Cabra Road (CBC0005PB002) will be moved as the post box will be more central on footpath. The post box on Blackhall Place (CBC0005PB004) is likely to be relocated to make for a clearer footpath width.

9.164. A total of 59 lamp-posts, within 11 groups of lamp-posts of architectural significance were identified in the study area. Four locations were identified where these features will be directly impacted during the Construction Phase where it is proposed that they will be moved to accommodate urban realm improvements, road realignments and cycle lanes.

9.165. For the purpose of consideration of this element of the EIAR, the route has been broken into sections and examined under each section in relation to Archaeology, Cultural Heritage & Architectural Heritage as follows:

- From–N3 Blanchardstown Junction to Snugborough Road
  - No national monuments or sites under preservation order, or recorded archaeological monuments are located within or in the vicinity of this section of the Proposed Scheme. No sites of cultural heritage interest were identified along this section.
- Snugborough Road to N3 / M50 Junction –
  - No national monuments or sites under preservation order are located within or in the vicinity of this section of the Proposed Scheme. Only one recorded archaeological monument is located within c. 50m of this section of the Proposed Scheme, a mill site that lies partly within the proposed pedestrian access ramp and steps at Mill Road, to the north-west of Mill Bridge, N3 Blanchardstown Road. Test excavations did not reveal any archaeological material.
  - No sites of cultural heritage interest were identified along this section.
- N3 / M50 Junction to Navan Road / Ashtown Road Junction –
  - No national monuments or sites under preservation order, or recorded archaeological monuments are located within or in the vicinity of this section of the Proposed Scheme. No sites of cultural heritage interest were identified along this section. However the off line works will extend to the Phoenix Park (RMP DU018-007001), a 17th century enclosed deer park.
  - A memorial dedicated to Lieutenant Martin Savage of the IRA, who was killed in Ashtown in the War of Independence in 1919, is located adjacent to the Ashtown Roundabout.
- Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction –
  - No national monuments or sites under preservation order, or recorded archaeological monuments or Protected Structures are located within or in the vicinity of this section of the Proposed Scheme. No sites of cultural heritage interest were identified along this section.

- No sites of cultural heritage interest were identified along this section.
- : Navan Road / Old Cabra Road Junction to Ellis Quay, -
  - This section of the Proposed Scheme traverses part of the ZAP for the Historic City of Dublin (RMP DU018-020), which begins on Prussia Street. In addition, there is one recorded archaeological monument within the Proposed Scheme, a late medieval bowling green (RMP DU018-020310;
  - A further six recorded archaeological monuments are located within c. 50m of the Proposed Scheme, two of which relate to the same structure at the Law Society of Ireland.
  - Three industrial heritage sites are recorded by the DCIHR within this section of the Proposed Scheme (DCC 2003 to 2009). There are two former tramlines within the Proposed Scheme. They were the commercial Number 9/10 line, which passed on the North Circular Road, and a Dublin Corporation line which travelled up Queen Street and George's Lane to an incinerator on Stanley Street.

9.166. The Board should note that the applicant has provided a list of all Protected structures along the route within table 16.7 of the EIAR submitted in addition a list of buildings contained within the National Inventory of Architectural Heritage site is also provided within table 16.9 of the EIAR. The Board should note in this regard that inclusion on the NIAH does not afford statutory protection.

9.167. The proposed development also overlaps with the Phibsborough Centre ACA at the junction with St. Peters Church.

9.168. In terms of street furniture and areas of historical paving I draw the Board's attention to tables 16.11 to 16.14 of the EIAR in which full list is provided of such items and their location within the scheme. The sensitivity of these features ranges from 'Regional Medium' to 'local low sensitivity'. Impacts to such features will be considered hereunder. It is of note however that there are no features of national significance or regional significance along the route.

Potential Impacts in relation to Archaeology & Cultural Heritage

- 9.169. Potential impacts to archaeology and cultural heritage relate to the construction phase of the proposed development and are associated with works relating to ground breaking activities which would be carried out in relation to pavement construction, repairs and reconstruction works; resurfacing works; piling; and any excavations of soil, including landscaping works, ground disturbance for utilities and grubbing up works.
- 9.170. There is one RMP site partly located within the Snugborough Road N3/M50 junction section of the Proposed Scheme as mentioned above. Whilst archaeological testing has not discovered any archaeological it is possible that remains of the mill building or associated features, such as mill-races and mill ponds, may survive sub-surface. Ground-breaking works associated with the construction of the proposed pedestrian access ramp and steps will impact any associated features that may be present below ground. The RMP site has a medium sensitivity value and the magnitude of impact is medium, therefore the potential impact is Negative, Moderate and Permanent.
- 9.171. As mentioned above works will be carried out near to the phoenix park where there is significant potential for archaeological material to be present. While the wall and gates of the recorded deer park will not be directly impacted, it is possible that ground-breaking works will impact on subsurface features associated with the site. This RMP site has a medium sensitivity value and the magnitude of impact is medium, therefore the potential impact is Negative, Moderate and Permanent.
- 9.172. In relation to the Navan Road / Old Cabra Road Junction to Ellis Quay section of the route as mentioned above there are eight RMP / SMR sites located, including the Historic City of Dublin ZAP (RMP DU018-020). The Board should note that none of the sites has any upstanding remains.
- 9.173. Ground-breaking works within the Historic City of Dublin ZAP have the potential to impact on any previously unknown archaeological sites or features that survive below ground. The RMP ZAP has a medium sensitivity value and the magnitude of impact is medium, and as only a small part of the extensive Historic City ZAP (RMP DU018-020) is affected, the potential impact is stated to be Negative, Moderate, Permanent.
- 9.174. The site of a Bowling Green is located within the Proposed Scheme on Blackhall Place (RMP DU018-020310). Ground-breaking works will impact on any remains that may survive below ground (these may include human bone related to skirmishes on

Oxmantown Green). The RMP site has a medium sensitivity value and the magnitude of impact is medium, and as the potential is for the discovery of human remains, the potential impact is Negative, Significant and Permanent.

9.175. Number of other locations where sub surface remains may be present are outlined within section 15.4.3.5.1.2 of the EIAR and I note that the magnitude of potential impacts at such locations ranges from none to negative moderate and permanent.

9.176. Impacts to historic tram lines along the route are limited with a magnitude of negative, slight and permanent.

9.177. One cultural heritage site has been identified at the junction of Manor Street and Aughrim Street with a potential for impacts to arise. The setting of the granite boulder will be altered to accommodate landscaping. The memorial will be temporarily removed to facilitate works with the overall magnitude of impact expected to be Negative, Slight, Temporary.

9.178. The Board should note that no impacts are expected at the construction compounds or during the operation of the proposed scheme.

9.179. In order to minimise and avoid such impacts, it is proposed to carry out monitoring of any excavation or groundbreaking works. This will ensure that in the event such material is encountered, it is preserved and recorded appropriately.

#### Mitigation for Archaeology & Cultural Heritage

9.180. Mitigation measures proposed include the following:

- Archaeological monitoring to be carried out under licence to the DHLGH and the NMI, and the proper excavation and recording of, all archaeological soils, features, finds and deposits which may be disturbed below the ground surface.
- In the case of cellars, coal cellars and / or basements, the appointed contractor in consultation with the archaeologist engaged by them will make provision for a geodetic survey and recording of each individual structure which will be subject to impact. This survey and recording will be carried out in advance of any construction works on cellars, coal cellars and / or basements.
- An experienced and competent licence-eligible archaeologist will be employed by the appointed contractor to advise on archaeological and cultural heritage

matters during construction, to communicate all findings in a timely manner to the NTA and statutory authorities, to acquire any licenses / consents required to conduct the work, and to supervise and direct the archaeological measures associated with the Proposed Scheme.

- In the event of archaeological features or material being uncovered during the Construction Phase, all machine work will cease in the immediate area.
- Secure storage for artefacts recovered during the course of the monitoring and related work will be provided.
- Archaeological investigation will be carried out prior to any works where any newly discovered features are present along the site.
- Features to be removed or relocated will be done under supervision.

9.181. No operational mitigation is required.

#### Potential Impacts in relation to Architectural Heritage

9.182. As mentioned above 43 Protected Structures or groups of Protected Structures were identified in the study area. No direct impacts are expected, impacts are therefore indirect and will potentially arise in relation to the construction phase of the development. The magnitude of effects in this regard are stated to be 'negative', 'moderate' and 'temporary'.

9.183. One structure of high sensitivity is the Blue Coat School / Law Society of Ireland on Blackhall Place (DU018-020177). It is proposed to replace the existing bus stop in front of the front boundary of this building and make changes to footpaths and reallocate road space within the carriageway adjoining the boundary of this building. Impacts in this regard are expected to be negative, significant and temporary.

9.184. The remaining RPS identified along the route either share a boundary or abut the proposed works and the magnitude of indirect effects is predicted to be Negative, Moderate and Temporary.

9.185. DCC have raised concerns in relation to the proposed cycleway through the stone setts on the curtilage of the entranceway at the Sisters of Charity Convent (RPS 4872). The Board should note that the applicant has responded to these concerns and states that the these historic setts will be re-laid within the footpath section of the Proposed

Scheme which will retain the positive contribution which they provide to the Protected Structure.

9.186. The route also encroaches onto the boundary of the Phibsborough ACA, the proposed works in this area will be minor in nature and the magnitude of effects is therefore expected to be negligible. I note DCC comments in this regard in relation to the design of bus stops, this has been considered within the assessment above and will not be repeated at this juncture.

9.187. It is of note that the application documentation includes an assessment on the DCC conservation areas which include the following:

- Prussia Street Conservation Area
- Blackhall Place Conservation Area
- Liffey Quays Conservation Area.

9.188. It is important for the Board to note that these are not Architectural Conservation Areas but are conservation areas that have been defined as such for the purpose of the Dublin City Development Plan. Impacts to such areas arise from construction and the magnitude of effects ranges from negative slight temporary to negative moderate long term.

9.189. I note DCC has no objection to the proposed works but recommends that all works are completed in a sensitive manner.

9.190. Potential impacts to street furniture are outlined in section 16.4.3.6. I note the Council's concerns in relation to the relocation of street furniture, lighting poles, and acknowledge that such measures are necessary to implement the proposed scheme. In the interest of retaining the integrity of these structures, I recommend that an Architectural Heritage Specialist is employed to monitor the removal and replacement of such structures.

9.191. Overall general impacts to architectural heritage arise in relation to the alterations to bus stop locations, particularly where these include the erection of new shelters, or the removal of existing shelters, and alterations to the public realm including the provision of new trees, and the removal of trees which may impact on the settings of sensitive features and sites. The proposed development will improve the overall streetscape along the proposed route and whilst I acknowledge that the removal of trees at specific

locations may impact the setting or character of a particular structure, I am satisfied that on balance the overall scheme will be a vast improvement to the character and setting of not only protected structures referred to above but the Phibsborough ACA also.

9.192. I draw the Board's attention to table 16.15 of the EIAR in which all of the potential construction impacts, and the magnitude of same are summarised for ease of reference.

Significant impacts do not arise in relation to the operation of the development. Operational impacts in relation to Protected Structures and ACAs are expected to be positive or neutral due to public realm improvements with the exception of two locations:

- St Vincent's Home, Navan Road (DCC RPS 5808), where kerbs are to be realigned to accommodate a new cycle track, resulting in the loss of existing grass verges and semi-mature roadside trees to the southeast of the existing gate lodge. A new cantilevered signal is proposed to the northwest of the historic entrance and gate lodge. The existing surfaces, at three of the gates are to be upgraded to stone pavers or setts. The potential Operational Phase impact is Negative, Slight and Medium-term. The Board should note that objections have been received in relation to the installation of a cantilevered signal at this location, I have reviewed the design of this bus stop which will be a vast improvement over the current situation and I note that the fabric of the curtilage will not be impacted upon by the proposed signal which is small in size and relatively inconspicuous in the context of the bus stop infrastructure. I recommend that this element of the development is retained.
- Everton House, 47 Old Cabra Road (DCC RPS 1088), where an existing bus-stop in front of the historic boundary is to be removed, and relocated further to the north and west. Everton House is Medium Sensitivity. The magnitude of impact is Medium. The potential Operational Phase impact on its setting will be Positive, Moderate and Long-term

#### Mitigation

9.193. I refer the Board to Section 16.5 of the EIAR in which mitigation measures are proposed in relation to the proposed works. Such measures include the following:

- The proposed mitigation is the recording, protection and monitoring of the sensitive fabric prior to, and for the duration of the Construction Phase.
- Employment of an Architectural Heritage Specialist to monitor all works and to record all materials during removal and replacement.

9.194. No mitigation is proposed in relation to the operational phase of the development as impacts are slight or not significant.

9.195. Following mitigation, no significant residual impacts are expected.

### Conclusion

9.196. I have considered all the written submissions made in relation to Archaeology, Cultural Heritage and Architectural heritage and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on Archaeology, Cultural Heritage and Architectural heritage can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on Archaeology, Cultural Heritage and Architectural heritage can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site including the proposed the other bus connects routes are not likely to arise.

### **Landscape and Visual**

9.197. Section 17 of the EIAR submitted examines the potential for impacts to arise in relation to landscape, townscape and visual impact. It is of note that visual impacts in relation to the proposed scheme have been examined in the context of the project design and the public realm within the assessment section of this report. Such matters will not be repeated hereunder and this section of the EIAR should be read in conjunction with the aforementioned. It is important to mention at the outset that likely significant adverse effects will arise but are short term and temporary in nature.

### Baseline Conditions

9.198. The establishment of baseline conditions was carried out based on initial desk studies, supported by full route walkovers and augmented by further specific site reviews. The Proposed Scheme includes a wide variety of suburban and inner-city suburban

residential landscapes, townscape and visual features from streetscape boundary and public realm features, to residential and mixed-use zonings, historic landscapes and boundaries, to biodiversity and heritage assets.

9.199. For the purpose of the visual & townscape assessment, the proposed route has been divided into five sections as follows:

- Section 1: N3 Blanchardstown Junction to Snugborough Road;
- Section 2: Snugborough Road to N3 / M50 Junction;
- Section 3: N3 / M50 Junction to Navan Road / Ashtown Road Junction;
- Section 4: Navan Road / Ashtown Road junction to Navan Road / Old Cabra Road Junction; and
- Section 5: Navan Road / Old Cabra Road junction to Ellis Quay.

9.200. Baseline conditions for each of the above sections is outlined in table 17.6 of the EIAR.

In brief I note that with regard to the first, second and third sections, the area is located within the outer suburbs and comprises predominately modern retail park / town centre with extensive road and carpark infrastructure, supported by young street tree and other planting. The route is a major road corridor with some undeveloped lands and includes significant wooded river valley corridor. River Tolka valley is designated 'high amenity area, there are no, tree preservation orders (TPO's). Protected views include a short section north from River Road adjacent to N3 / M50 Motorway Junction and views along Royal Canal. Protected Structures include: Ranelagh Bridge on Royal Canal (structure sits beneath N3 / M50 Roundabout.

9.201. Section 4, which encompasses Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road is located within the outer suburbs and is predominantly residential with some institutional uses along the route. Route comprises major long straight road corridor, mainly three lane with some two lane sections.

9.202. Primarily established residential area with traditional two-storey properties with gardens and driveways fronting either side of the road. Some short sections of single-storey terrace cottages (e.g. 136-142 Navan Road) and occasional commercial / retail developments (e.g. R147 Navan Road / Skreen Road junction, car sales garages at eastern end). Some infill development on-going and Navan Road Health / Primary Care Centre is a prominent new part four-storey development with integrated public

plaza. Some large-scale institutional lands, which adjoin the R147, are located at Ashgrove Nursing Home, St. Vincent's, Dominican Convent / Assisi House and grounds, St. Joseph's / The Edmund Rice School and grounds. The townscape / streetscape has elements and characteristics likely to be perceived as high value including adjoining areas of open space with prominent mature trees. Architecture and streetscape are of a generally good standard, including regular street trees.

9.203. Open spaces at Belleville, Kempton, the Paddock's, Belvedere Sports Grounds, and within Pine Hurst are of note. No tree preservation orders or protected views or protected structures are present.

9.204. Section 5 which encompasses Navan Road / Old Cabra Road junction to Ellis Quay is broken up into 3 smaller areas:

- Navan Road / Old Cabra Road Junction to Prussia Street (Hanlon's Corner)
- Prussia Street (Hanlon's Corner) to King Street North Junction.
- King Street North Junction to Ellis Quays

9.205. Navan Road / Old Cabra Road Junction to Prussia Street (Hanlon's Corner), comprises, inner city suburb, primarily residential with local services. Residential street with mix of semi-detached and terrace properties, with some detached properties. Predominantly two-storey brick, brick and render, or render houses and mature gardens with driveways fronting the road. No amenity designations or protected views. Protected Structures include, No. 1088 Everton House and No. 1658 Grainger Hanlon's Corner Public House.

9.206. Prussia Street (Hanlon's Corner) to King Street North Junction comprises established inner city village and residential area centred on Stoneybatter. This street is part narrow / part wide street with range of commercial, residential, office and retail predominantly two and three-storey terraces, often with narrow footpaths. Mix of original buildings with some infill redevelopment. Civic space at junction of Prussia Street / Manor Street / Aughrim Street. Some vacant building plots used for parking of cars. Amenity designations include, open space with trees around Drumalee, Conservation Area at Prussia Street Stoneybatter, Residential Conservation Areas in Stoneybatter. No protected views or TPO's, Protected Structures are many in number and include terraces on either side of Manor Street, and to some commercial

properties along Stoneybatter. Also No. 6874 Former City Arms Hotel, No. 4885 Kavanaghs Public House, and No. 4872 Two-storey stone lodge. Stone arched convent and school entrance with two pedestrian entrances.

9.207. King Street North Junction to Ellis Quays comprise outer city centre. Mixed city uses. Mixed urban street predominantly of two-storey brick terraces in residential and office use. Occasional three-storey properties with higher modern infill redevelopments (e.g. Oxmanstown Green). Law Society of Ireland. Amenity Designations include Conservation Area along Blackhall Place and Liffey Quays. No TPO's, Protected Views relate to East and West along the Liffey Quays. Protected structures include: Nos.763-764 Georgian houses, No. 765 Incorporated Law Society (former King's Hospital School), No. 766 House, No. 767 Methodist Church, No. 709 House and Shop (corner with Benburb Street) and No. 728 Apartment building, excluding ground floor.

#### Potential Impacts

9.208. The potential for impacts to arise relate to both the construction and operational phase of the development. The applicant within section 17.4.1 of the EIAR has listed the key characteristics of the proposed development which are of particular relevance to the townscape and visual assessment. Such characteristics relate to proposed works at specific locations such as the provision of new junction layouts, lighting, drainage, road markings and surfaces, land take for the widening of surfaces, removal of trees and landscaping open space landscaping.

9.209. Other impacts relate to the location of construction compounds on open space areas and within the existing road corridor at 3 separate locations, all of which are detailed in Section 17.4.1.3.6 of the EIAR.

9.210. In terms of the operational phase of the development, visual and landscape changes relate to the change in traffic movements, the provision of SUDs, the change to road surfacing, improvements and changes to public realm.

9.211. The applicant has provided photomontages of the scheme which I have had regard to in the assessment of effects to landscape, townscape and the visual aspects of the proposed development. These demonstrate that the overriding visual changes to the proposed route relate to the loss of trees and vegetation and the replacement of same with species at a smaller growth stage.

9.212. In the interest of conciseness, I will examine the potential impacts relevant to each of the five sections of the scheme individually hereunder and will briefly summarise the findings of the EIAR in this regard. It is important to note however that certain construction activities are common to all sections and will have a certain level of impact visually. The presence of construction machinery, fencing and hoardings and general construction activities associated with the diversion of services and widening and resurfacing of road space will all have a visual impact albeit temporarily. Such activities cannot be mitigated and are not considered to be significant given the temporary nature of the works. I refer the Board to table 17.7 and 17.8 in which a summary is provided outlining all of the potential construction and operational impacts and the associated magnitude of effects.

- N3 Blanchardstown Junction to Snugborough Road– landscape/ townscape of low/medium sensitivity - substantial excavation and construction works of sections of kerbs, road carriageways, retaining wall, sections of footpaths, junctions, surfacing and parking, drainage features, and localised removal of trees and planting within and around Blanchardstown Shopping Centre– magnitude of effects is therefore negative, moderate and temporary.
- Snugborough Road to N3 / M50 Junction – landscape/ townscape of low sensitivity – works include works to Tolka River bridge, Mill Road Bridge and Pedestrian ramps. These ramps will be constructed to provide access between Mill Road and new bus stops on the N3 dual carriageway. The Construction Phase will necessitate temporary land acquisition from 2no. residential properties. The Proposed Scheme also includes for provision of a construction compound (Compound BL2) in landscape area in the junction between N3 Navan Road and Access to Junction 6 Health and Leisure Centre - magnitude of effects is therefore ‘negative’, ‘moderate’ and ‘temporary’.
- Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction landscape/ townscape of medium sensitivity. Works involves excavation and construction works along the full road corridor with direct impact on sections of kerbs, verges and young street trees, carriageways, footpaths, junctions, drainage features, utilities and sections of roadside boundaries. The Construction Phase will necessitate temporary land acquisition from 83no.

residential properties, and a number of open spaces and commercial properties, with associated direct impact on property boundaries and / or entrances, driveways, gardens / landscape areas and associated plantings. Magnitude of effects will be Negative, Significant / Very Significant and Temporary / Short-term.

- Navan Road / Old Cabra Road Junction to Ellis Quay the townscape is of high / very high sensitivity and construction of the Proposed Scheme involves removal of landscape features, excavation and construction works of sections of kerbs, carriageways, sections of footpaths, junctions, surfacing and parking areas, drainage features and utilities along the road corridor. - magnitude of effects is therefore Negative, Moderate / Significant and Temporary / Short-term.

9.213. It is clear from the foregoing that the main areas of significance in terms of changes to the streetscape relate to the proposed pedestrian ramps. The pedestrian ramps will be constructed to provide access between Mill Road and new bus stops on the N3 dual carriageway. Pedestrian ramps will be constructed to the north of the N3 (RW07-B) within open space at Tolka Valley and to the south of the N3 (RW07-A) within open space adjacent to Millstead. The works will require partial removal of groups of mature trees and young trees and vegetation at both locations and substantial changes to the existing open space at Millstead including a reduction of screening vegetation bordering the N3 and provision of replacement planting.

9.214. Additional works along the Navan Road / Ashtown Road Junction to Navan Road / Old Cabra Road Junction which will require temporary land acquisition from 83no. residential properties which will result in a significant impact albeit on a temporary basis.

9.215. Whilst these works will provide for a change in the streetscape at these locations, I am satisfied that the changes are not sufficiently negative as to warrant a refusal of the development. The proposed ramp will provide significantly improved access to bus stop on the N3 and will not directly impact on any dwellings.

9.216. Works along the Navan Road/ Ashtown Road junction to Navan Road / Old Cabra Road Junction will result in the setting back of existing boundaries and the removal of roadside trees. Boundaries will be replaced with similar new treatments and planting

and based on the nature of the works I am satisfied that the overall streetscape will be improved upon by virtue of the new infrastructure proposed. New trees will be introduced in this area and as such impacts will not be permanent, although they are expected to be Negative, Very Significant/Profound in the short term.

9.217. In terms of surrounding ACAs, I note that the proposed scheme encroaches into the Phibsborough ACA however works at St. Peters Church junction are minor in nature and comprise of signage changes. The nature and scale of these works will therefore not have any significant impact on the visual amenity of the ACA.

9.218. The applicant has examined the potential for impacts to arise in relation to areas identified within the Dublin City Development Plan as conservation areas and residential conservation areas and I note that no significant impacts are expected to arise in this regard.

9.219. I have reviewed the operational phase impacts and note that the operation of the development will not give rise to significant visual or landscape impacts along the route.

9.220. This phase of the Proposed Scheme will require permanent land acquisition from a number of non-residential properties, including commercial properties:

- Various parts of landscape space / car parking / internal roads at Blanchardstown Shopping Centre (Ch. A000 to Ch. A550, Ch. B000 to Ch. B600, Ch. D000 to Ch. D168, Ch. E100 to Ch. E362 (and beyond), Ch. F000 to Ch. F350);
- Land from various roadside open spaces along the N3 and Navan Road, including land in Tolka Valley and Irish Water pumping station (Ch. A000 to Ch. A4900);
- Open space at Millstead Ch. A1600 to Ch. A1650);
- Open space at Auburn Green (Ch. A2900 to Ch. A2970);
- Circle K, Ashtown Service Station, Navan Road (Ch. A3400 to Ch. A3480)
- Ashtown Business Centre, Navan Road (Ch. A4460 to Ch. A4480) Land to the southwest of Ashtown roundabout (Ch. A4800 to Ch. A4860);

- Landscape areas at Navan Road / Kempton Avenue Junction (Ch. A5020 to Ch. A5120);
- Open space with tree planting at Belleville (Ch. A4880 to Ch. A4960);
- Front of Belvedere Sports Ground (Ch. A5970 to Ch. A6130);
- Part landscape space / part car park at Cabra Garda Station (Ch. A6650 to Ch. A6760);
- Front of Holy Family School for the Deaf Grounds (Ch. A6760 to Ch. A6970);
- Curam Care Home (Ch. A6970 to Ch. A7020);
- Front of Telephone Exchange, including part of tree-line planting area (Ch. A7040 to Ch. A7120);
- Part of landscape area at front of MLS Park Motors (Ch. A7140 to Ch. A7260); and
- Entrance and low wall to front of Park Shopping Centre Car Park (Ch.8310 to Ch.8330).

9.221. In addition the operational phase will also require the permanent acquisition of lands from 55 no. residential properties:

- Woods End Apartments, River Road;
- No. 3 Catherine's Well;
- Entrance to Phoenix Park Racecourse development;
- Nos. 137, 139, 141, 143, 145, 147, 149, 151, 153, 155 (The Haven), 157 (Mount Eden), 159, 161, 163 and 165 Navan Road (15no.);
- Nos. 198, 200, 202, 204, 206, 208, 210 and 212 Navan Road (8no.); and
- Nos. 265, 267, 269, 271, 273, 275, 277, 279, 281, 283, 285, 287, 289, 291, 293, 295, 297, 299, 301, 303, 305, 307, 309, 311, 313, 315, 317, 319, 321, Navan Road (29no.).

9.222. The magnitude of change for the non-residential properties with permanent land acquisition will be Negative, Moderate and Temporary / Short-term. With regard to residential properties the magnitude is expected to be Negative, Very Significant and

Short-term becoming Negative, Very Significant, Short-Term becoming Negative, Significant, Long-Term.

9.223. The magnitude of operational impacts are expected to be negligible/slight in the long term and positive in many areas.

#### Mitigation

9.224. In order to reduce the magnitude of effects to landscape, streetscape and townscape it is proposed to protect vegetation that is to be retained during construction through the use of protective fencing. Where boundaries and vegetation are to be removed a record will be kept in order to replace the features with similar items. Where possible vegetation will be retained and replanted. All works will be carried out in accordance with a CEMP.

9.225. No mitigation or monitoring is proposed for the operational phase of the development.

#### Residual Impacts

9.226. Whilst mitigation will achieve a reduced impact and protect trees and vegetation to be retained, it will not eradicate the impacts listed above. The removal of mature trees cannot be mitigated and as such significant Construction Phase impacts at a local level remain unchanged in the post-mitigation and monitoring scenario. Operational phase impacts will improve with time as vegetation matures and will therefore not be significant. In conclusion therefore, significant long-term impacts to landscape and visual amenity do not arise in relation to the proposed development for the large part, with the exception being in relation to the loss of property which is stated to be negative, significant and longterm. Notwithstanding this, the acquisition of lands whilst changing the existing layout of boundaries etc, will give rise to localised impacts and not impacts of significance in the wider environment.

#### Conclusion

9.227. I have considered all of the written submissions made in relation to Landscape, Streetscape and Visual and the relevant contents of the file including the EIAR. I am satisfied that the potential long-term impacts on landscape, streetscape and visual amenity can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect long-term impacts on

landscape, streetscape and visual amenity can be largely ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site including the proposed the other bus connects routes are not likely to arise.

### **Land, soil, geology and hydrogeology**

9.228. Section 14 of the EIAR submitted addresses lands, soils, geology and hydrogeology.

#### Baseline Conditions

9.229. The land uses in the region are mainly comprised of urban developments including but not limited to; industrial, commercial, residential and recreational. Moving away from the City Centre there are also agricultural and forested areas in the region and old quarry sites. Geomorphology and topography are examined within the EIAR in order to give context to any potential changes to land, soils, geology, and hydrogeology that could influence the importance of a feature and the magnitude of any impacts.

9.230. The Proposed Scheme is predominantly underlain by made ground over alluvium over glacial till over limestone bedrock.

9.231. The majority of the soils expected to be encountered within the study area are made ground comprising varying forms of hard standing materials including road pavements and footpaths. Alluvium and marine sediments are also present along the route mostly around the Tolka River. Subsoils comprise glacial till for the most part with areas of gravels and shallow bedrock.

9.232. The underlying bedrock of the study area is predominantly comprised of the Lucan Formation (of carboniferous limestone). Excavations will not exceed 300mm in depth, reference to bedrock is therefore for context and not related to concerns relating to potential impacts. There are no karst features identified within the study area.

9.233. Given the urban setting of the proposed development it was considered prudent to examine the potential for contaminated lands to be present within the route of the scheme. No such soils were encountered.

#### Potential Construction Impacts

9.234. It must be stated at the outset that no significant impacts are expected to arise in relation to land, soil, geology and hydrogeology. Impacts are expected to occur in relation to the following:

- Loss or damage of topsoil – works giving rise to potential effects – contamination of soils due to spillage of concrete/hydrocarbons/bitumen sealants etc, excavations and soil stripping and construction machinery – magnitude of effects is expected to be **slight**.
- Excavation of potentially contaminated ground – works resulting in exposure of contaminated material – magnitude of effects - **slight**
- Loss of future quarry or pit reserve – quarries were present at the River Tolka Valley Park, Ashleigh Green, N3 / M50 Junction roundabout and west of Phoenix Park Avenue. The proposed development could result in the loss of these sources. However, the magnitude of this impact is negligible as it results in an insufficient permanent irreversible change on a local scale to affect the integrity of the land and soils as a potential future quarry or pit reserve above the Do Nothing scenario – magnitude of this impact will be **imperceptible**.
- Loss or Damage of Proportion of Geological Heritage Area - The land, soils and geology on a local scale will be negatively impacted by the construction of new pavements and structures. However, as there are no intended works within the CGS, the magnitude of this impact will be **negligible**.
- Loss or damage of proportion of aquifer - minimal excavation into the limestone rock as part of the Proposed Scheme – magnitude of impact **negligible**
- Change to groundwater regime - Localised pumping of excavations could lead to change in groundwater levels – magnitude of effects – **imperceptible**.

#### Potential Operational Impacts

9.235. The Operational Phase has the potential to lead to occasional accidental leakage of oil, petrol or diesel, allowing contamination of the surrounding environment. The magnitude of the impact is **negligible**.

#### Mitigation

9.236. Standard mitigation measures are proposed in relation to the protection of soils, geology and geomorphology during construction and are outlined in section 14.5 of the EIAR and the CEMP accompanying the application. No mitigation measures are deemed necessary for the operational phase of the development. Consequently,

subject to the implementation of construction mitigation, no residual effects are expected.

9.237. Cumulative impacts have been considered in this regard and given the nature of the proposed works are considered to be unlikely.

#### Conclusion

9.238. I have considered all of the written submissions made in relation to lands, soils, geology and hydrogeology and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on lands, soil, geology and hydrogeology can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on lands, soils, geology and hydrogeology can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

#### **Water**

9.239. Section 13 of the EIAR submitted examines the potential for impacts to arise in relation to hydrology. As mentioned above the proposed route will follow the existing Old Cabra Road/N3 route from the city and lies within Hydrometric Area (HA) 09 (Liffey and Dublin Bay) and is within the River Liffey catchment. Relevant water body status is outlined within table 13.7 of the EIAR. It is of note from this table that the known status of the waterbodies encountered along the route range between poor and good, and all are at risk with pressures arising from urban wastewater. No SUDs measures are present within the study area.

#### Baseline Conditions

9.240. The waterbodies examined for the purpose of EIA for the proposed scheme include the following:

- Tolka\_040
- Tolka \_ 050;
- Royal Canal, and
- Liffey Estuary Upper.

- Powerstown (Dublin)\_010<sup>3</sup>
- Tolka\_030<sup>3</sup>

9.241. Hydrological connections to the above waterbodies are via the sewer system and roadside gullies.

9.242. I draw the Board's attention to Appendix 13.1 of the EIAR which contains a Water Framework Assessment report. It is concluded within this report that the proposed scheme will not compromise progress towards achieving GES (Good Ecological Status) or cause a deterioration of the overall GEP (Good Ecological Potential) of any of the water bodies that are in scope. The WFD also requires consideration of how a new scheme might impact on other water bodies and other EU legislation. The following assessment will examine the potential for the proposed development to impact waterbodies within the study area. The Board should note that an Appropriate Assessment has been carried out as outlined above and considers the impact to other EU legislation accordingly.

#### Potential Construction Impacts

9.243. The potential for impacts to arise in relation to these water bodies is summarised hereunder and the magnitude of any effects stated. The Board should note that the effects listed hereunder relate to the construction phase of the development, operational effects will be considered separately.

- **Tolka\_040** - The catchment area between N3 Blanchardstown Junction and N3/M50 Junction discharges to the Tolka\_040 water body which runs to the north-east of the Proposed Scheme for much of this section. The widening of BR01 Tolka River Bridge has the potential for greater impacts on the water body than the other activities between Snugborough Road to N3/M50 Junction. Potential impacts relate to disturbance to the water body as a result of silty water runoff from stripped lands directly adjacent to the banks of the Tolka\_050. Machinery operating near to the water body also brings increased risk of oil and fuel leaks or spills. This has the potential to lead to short term, adverse impacts of large magnitude, resulting in an impact of **Profound significance**.

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<sup>3</sup> Outside the study area but included short sections of road for displaced traffic, which most likely drain to these water bodies are predicted to have >10,000 AADT under the Do Something scenarios for 2028 and/or 2043 as a result of the Proposed Scheme.

- Additional works at the Mill Road, pedestrian ramps (RW07A and RW07B). The temporary working area around RW07B Pedestrian Ramps on the northern side of the N3 Dual Carriageway is approximately 15m from the Tolka\_040 at its closest point. In addition, BR02 Mill Road Bridge will also be widened to facilitate widening of the N3 Dual Carriageway. Potential impacts associated with BR02 Mill Road Bridge and RW07A and RW07B Pedestrian Ramps construction works include the potential for silty water runoff or increased sediment loads. Surface water systems drain into the Tolka\_040 in this area. This has the potential to lead to short term, adverse impacts of **moderate magnitude**, resulting in a **Significant impact**.
- Construction Compound BL2 to the west of the M50, there is potential for impacts as a result of accidental spillages of oil or fuel or runoff from stored materials. This has the potential to lead to short term, adverse impacts of small magnitude, resulting in an impact of **Moderate to Slight significance**.
- **Tolka\_050** - Construction Compounds BL3a and BL3b to the east have potential for impacts on the Tolka\_050 as surface water drains outfall to it from these locations. - Magnitude of effects - **Slight – significant significance**.
- **Royal Canal Main line (Liffey and Dublin Bay)** – Works to the M50 Roundabout and widening of Navan Road in this area will involve some intrusive works. As a result, impacts on the Royal Canal from silty water runoff could occur. This has the potential to lead to short term, adverse impacts of small magnitude, resulting in impacts which are **Significant to Moderate significance**.
- **Liffey Estuary Upper** – There is potential for impacts during the operation of SWOs in a storm, as these discharge to the Liffey Estuary Upper and could carry increased sediment. During a storm event this has the potential to lead to short-term, adverse impacts of negligible magnitude given the likelihood of the water body being in spate (high flow) at the time. This would result in an impact of **Imperceptible significance**.
- **Dublin Zoo Ponds** - There is potential for silty water runoff as a result of the road widening works in this area. This has the potential to lead to short term,

adverse impacts of moderate magnitude, resulting in an impact of **Moderate significance**.

#### Potential Operational impacts

9.244. The potential impacts for the Operational Phase are related to water quality and hydromorphology only. No potential changes to hydrology are predicted as the drainage design ensures no net increase in runoff rates. The magnitude of effects to the waterbodies listed above is of imperceptible significance. The Board should note that it is proposed to incorporate SUDs measures into the proposed scheme along the entirety of its length where there are none at present. Such works will have a positive impact on the receiving waters surrounding the proposed scheme.

9.245. It is important to acknowledge that there will be additional traffic flows on diverted routes both during the construction and operation of the phases of the proposed scheme. I have considered such changes and agree with the conclusions in this regard that the proposed development would result in an imperceptible impact to the water environment within these areas and will therefore not give rise to significant environmental effects.

9.246. Overall, I have considered the submissions and the contents of the application in relation to water and am satisfied having regard to the existing baseline environment and proposed mitigation measures that there will be no significant residual impacts on the hydrological environment within or connected to the proposed scheme.

#### Flooding

9.247. The applicant has carried out a flood risk assessment for the proposed scheme, which is appended to the EIAR, it is important to note at the outset that a stage 2 FRA was not required as the development is in an area of low risk. The following is a summary of the potential for flooding along the scheme and the overall impact of the development in relation to each flood type.

#### Fluvial / Coastal Flooding:

9.248. The OPW flood maps show the Proposed Scheme will be outside the boundaries of the flood zones, and therefore, there will be no likelihood of flooding from this source.

Groundwater flood risk - Scheme falls into the 'Low' groundwater vulnerability categories.

9.249. As the Proposed Scheme is on existing roads with no known flooding specifically due to groundwater. It is not expected that this risk will increase to the site or surrounding areas due to the construction of the Proposed Scheme.

#### Pluvial Flooding

9.250. Whilst there is a risk of pluvial flooding along the proposed route, this risk will be reduced as a result of the drainage improvements of the Proposed Scheme.

9.251. With regard to the foregoing, I have reviewed the drainage implications of the proposed development and note that the drainage design will ensure no net increase in surface water flow discharges. New surface water sewers are designed to provide attenuation for return period of up to 30 years where possible and the introduction of SUDs measures along the route will contribute to the management of fluvial flooding risk through the provision of surface water storage capacity in the network. The overall impacts in relation to flooding and water quality are positive along the route of the proposed scheme.

#### Mitigation

9.252. Mitigation measures are outlined in section 13.5 of the EIAR and include measures to control sediments, restrict storage of fuels to bunded areas and restrict the method of concrete use near to water bodies will ensure that accidental sediment and hydrocarbon release to waterbodies does not arise. The proposed scheme is expected to have an overall positive impact on water quality and is therefore in compliance with the requirements of the Water Framework Directive in that it will not cause a deterioration in status in any waterbody or prevent any waterbody from achieving good status. No residual significant negative impacts are therefore expected to arise.

9.253. I considered all of the written submissions made in relation to Water and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on water can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on water can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

## **Biodiversity**

9.254. Chapter 12 of the EIAR submitted examines the potential for impacts to arise in relation to biodiversity. This element of the development will focus on biodiversity in general within the site and its surrounds.

### Baseline Conditions

9.255. The Proposed Scheme includes a wide variety of suburban and townscape features that delineate the long-established transport corridor that is the N3 / Navan Road that leads into the City Centre. In general, habitats along the Proposed Scheme are dominated by buildings and artificial surfaces, although there are areas of seminatural woodlands and planted boundary woodland including along the Tolka Valley and Phoenix Park, watercourses and public realm planting.

9.256. The applicant has outlined habitats present along each section of the route within section 12.3 of the EIAR which will not be repeated. Of relevance to the Board is the presence of the Tolka River within Section 2 Snugborough Road to N3 / M50 Junction.

9.257. The Zone of Influence (Zol) of the Proposed Scheme in relation to terrestrial habitats is generally limited to the footprint of the Proposed Scheme, and the immediate environs. The applicant acknowledges within the EIAR that Hydrological and Air Quality impacts can cause effects to biodiversity at significant distances from the development boundaries. The potential for significant effects is therefore considered within a wider zone of influence for these two issues.

9.258. Air quality Zol is set depending on the activity i.e 50 m from proposed scheme, 500m from construction compound during construction phases and 200m from the proposed scheme boundary or local road networks experiencing a change in AADT (Annual Average Daily Traffic) flows greater than 1,000 during the Operational Phase.

9.259. The Zol for aquatic plant and animal species incorporates all estuarine habitats located downstream of where the Proposed Scheme will drain to the proposed crossing points (these are outlined in Table 12.7 of the EIAR) and the marine environment of Dublin Bay.

9.260. The Zol for impacts to aquatic fauna species, such as Atlantic salmon (*Salmo Salmar*) and lamprey species *Lampetra* spp., is limited to those water courses that will be

crossed by the Proposed Scheme or water bodies to which runoff from the Proposed Scheme could drain to during construction.

9.261. Zol for other species are as follows:

- Pygmy shrew – 100m from proposed scheme boundary
- Otters, badgers, stoat, and hedgehogs – extends to greater distances and breeding sites is 150m from boundary of scheme.
- Bat roost – 200m which can be adjusted accordingly depending on species. Habitat severance could extend for several km.
- Wintering birds – ex-situ up to 300m.
- Amphibian species – direct habitat loss / indirect impact to water quality.
- Lizard – direct habitat loss and severance / displacement during construction.

9.262. Overall, it is clear that the determination of the zone of influence differs depending on the construction and operational activity.

9.263. It is important to note that the proposed development does not fall within the boundary of any European sites, Ramsar Sites, designated NHAs, Nature reserves or Biosphere Reserves. The proposed scheme will cross over the Royal Canal pNHA.

9.264. The nearest European site is South Dublin Bay and River Tolka Estuary SPA followed by South Dublin Bay SAC, which are both located approximately 2.9km and 4.6km east of the Proposed Scheme, respectively. All European Sites within the zone of influence of the proposed scheme are outlined and examined within the Appropriate Assessment Section of this report and will not be repeated hereunder.

9.265. In order to establish biodiversity baseline conditions, the applicant carried out numerous walkovers of the site and carried out detailed mammal, bird, bat, reptile and amphibian surveys of the route and the surrounding areas between 2018 and 2020 with updated surveys carried out in 2022, details of all surveys are outlined in section 12.2.3 of the EIAR. As mentioned above habitats and species encountered are typical of that within developed urban environments of significance to the proposed development and I note that surveys and desk top studies recorded the following within the development boundary of the proposed scheme: mammals such as badger (known to occur within 1km of the proposed scheme) and multiple otter spraints, the River

Tolka is known area of high otter activity. Two otter holts were recorded within a 197 and 350 metre distance from the proposed works, I note that neither of these holts would be intercepted by the proposed scheme.

9.266. A Kingfisher survey was carried out in September 2020 and whilst suitable habitat was recorded, no nests were encountered. A single kingfisher was seen in flight at the time of the survey.

9.267. No nests of breeding birds of conservation concern were recorded within the study area. I note that habitats present within the proposed scheme route are not suitable to wintering birds and as such no survey was undertaken in this regard.

9.268. Three inland feeding sites utilised by wintering birds have been identified within the NIS as follows:

- Belvedere Sports Ground Cabra, (unknown importance) approximately 25m (open feeding ground) from the Proposed Scheme;
- Pope John Paul II Park Cabra (high importance) approximately 100m from the Proposed Scheme; and
- Ashtown Playing Pitches (major importance) approximately 132m from the Proposed Scheme

9.269. These sites are separated from the works areas by buildings and car parks.

9.270. No records of common lizard were reported however common frog and smooth newt were recorded. I also note that the Tolka River is a salmonoid river and invertebrates such as white clawed crayfish, were recorded within the study area.

9.271. Notwithstanding the foregoing, findings it is proposed to carry out preconstruction confirmatory surveys in order to ensure that such species are not affected by the proposed construction works. The implementation of SUDs will ensure the avoidance of habitat degradation for mammals that utilise the riverbanks. Such measures will also prevent additional sediment release to the river and other surrounding watercourses therefore protecting aquatic species from dis-improvements in water quality. In addition, it is important to note that works will occur during normal daytime working hours and at locations such as river crossing, and the Royal Canal will not be carried out at night. The applicant therefore states that the proposed works will therefore not

impact the behaviour or foraging patterns of nocturnal mammals such as otter and badger.

9.272. As mentioned the Tolka is a salmonoid river and suitable spawning habitat was encountered c. 110km downstream of the proposed scheme crossing point. Suitable lamprey spawning was also encountered at the same location.

9.273. No red-listed freshwater mollusc species were recorded during the aquatic surveys or habitat suited to Marsh Fritillary.

9.274. Section 12.4 of the EIAR and refer to the stages of development and the particular process of construction relative to each stage, I have reviewed this section of the EIAR in the context of biodiversity and will examine the potential for impacts to arise as follows:

#### Potential Impacts in relation to bats

9.275. Bat surveys have been carried (see details in section 12.3.8.1 of EIAR) with the following species recorded:

- Leisler's bat
- Common Pipistrelle
- Nathusius' pipistrelle bat
- Soprano pipistrelle

9.276. Leisler's bat, was recorded in four locations surveyed between 2018 and 2021, at CBC0005BT004 (Phoenix Park) (two locations in the phoenix park were recorded), CBC0005BT001 (Snugborough Road), CBC0005BT002 (Mill Road), CBC0005BT005 (Ashtown Road), further surveys are outlined within section 12.3.8.1.1. It is important to note that no roost sites for Leisler's bat were recorded during any of the surveys for the Proposed Scheme. The desk study found that Leisler's bat is known to occur in the wider study area and utilise foraging habitat within the greater Dublin area.

9.277. Common Pipistrelle was recorded in all four transects surveyed between 2018 and 2021, at CBC0005BT001 (Snugborough Road), CBC0005BT002 (Mill Road), CBC0005BT004 (Phoenix Park) and CBC0005BT005 (Ashtown Road). A total of 48 recordings of this species were made in these locations between 2018 and 2020, with a total of 33 recordings of this species made during the July 2021 surveys at

CBC0005T1\_N3 Wide and a further 31 recordings from (CBC0005T2\_Mill Road). No roost sites for common pipistrelle bat were recorded during any of the surveys for the Proposed Scheme.

9.278. Nathusius' pipistrelle bat not recorded within the study area.

9.279. Soprano pipistrelle was recorded in four of the five locations surveyed between 2018 and 2021, at CBC0005BT001 (Snugborough Road), CBC0005BT002 (Mill Road), CBC0005BT004 (Phoenix Park), and CBC0005BT005 (Ashtown Road). A total of 122 recordings of this bat species can be attributed to these two locations. During the two summer 2021 transect surveys, Soprano pipistrelle bats were recorded along both transects, with a total of 61 recordings captured along CBC0005T1\_N3 Wide and a further 304 recordings from (CBC0005T2\_Mill Road). No roosts were recorded.

9.280. Unidentified pipistrelle species were recorded in only one location surveyed in Spring 2020 along CBC0005BT002 (Mill Road) A total of three recordings of unidentified pipistrelle species were identified at this location in Spring 2020.

9.281. Brown Long-Eared Bat *Plecotus auratus* was not recorded and *Myotis* bat species were identified in three of the five locations surveyed between 2018 and 2020: CBC0005BT001 (Snugborough Road), CBC0005BT002 (Mill Road), and CBC0005BT004 (Phoenix Park). A total of six recordings of unidentified *Myotis* species were identified in these locations between 2018 and 2020.

9.282. Two trees were originally identified as having potential to support roosting bats (PRFs). One ash tree (CBC0005PRF001) was recorded along a treeline which forms the boundary of the Junction 6 Castleknock Health and Leisure Village; and the other (CBC0005PRF002) is a beech tree in an area of mixed broadleaved woodland to the south of Mill Road on the western side of the Navan Road (N3). In the context of the surrounding landscape, CBC0005PRF002 would be considered more likely to support roosting bats, given its wooded location away from direct road illumination and the greater foraging resource of the surrounding wooded area.

9.283. A further 18 PRF's in nine separate trees, largely outside the Proposed Scheme were identified in the March 2022, none of these trees are to be removed.

9.284. In summary, the applicant states that in total eleven trees with 20 Potential Roost Features (PRFs) were identified across the original multidisciplinary surveys for the

Proposed Scheme and the 2022 update survey. Of the 11 trees, four trees with PRFs are located within the footprint of the Proposed Scheme.

9.285. In assessing the impacts of habitat loss as a result of fragmentation of foraging / commuting habitat on bat populations, consideration was given to a species Core Sustenance Zone (CSZ). A CSZ refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the 'resilience and conservation status' of the colony using the roost.

9.286. Having regard to the type of works proposed e.g. upgrading of existing infrastructure for the most part), it is stated that there is limited potential for the Proposed Scheme to act as a barrier to flight paths for bat species.

9.287. In addition to the foregoing the removal of vegetation will occur within boundaries of the proposed scheme, however such vegetation will be within the road medians. This habitat removal is therefore within a highly disturbed urban environment with low numbers of bat species records, and, as such is not deemed to provide significant contributions to core sustenance zones of roosts outside of the footprint of the Proposed Scheme.

9.288. Nonetheless it is proposed by the applicant that where practicable, habitats of importance to bats such as scattered trees and parkland, treeline and hedgerow habitat types, which lie within the footprint, or along the boundary of the Proposed Scheme, will be retained. It is also proposed to bolster such habitat with the planting of an additional street trees, hedgerows, species rich grassland, native planting, ornamental planting and of proposed amenity grassland planting.

9.289. An additional potential impact to bats arises from the introduction of lighting in the construction compounds. In order to prevent significant impacts to bats utilising this area, lights will be installed in a manner that directs light downwards and will be of a reduced intensity to reduce any potential impacts to bats.

9.290. With regard to the construction compound, it is of note that this facility will be located in within a heavily trafficked urban areas whereby bat species are habituated to light to a certain degree. Thus, given the limited numbers encountered, the absence of any roosts recorded and the environment in which the proposed development is located it is reasonable to assume that impacts to bats at this location will not be significant.

### Mitigation in relation to Bats

9.291. Mitigation measures proposed include, pre-construction surveys, use of bat boxes where trees with PRFs are in existence these will be protected where practicable. The use of low lux directional lighting at compounds and at works areas, low level lighting where required and the use of sensor lights.

9.292. Overall, given the limited level of bat activity within the vicinity of the proposed works, the absence of any roost sites, the availability of suitable habitat within the vicinity of the works and the mitigation measures proposed above, I am satisfied that the proposed development adequately provides for the protection of bat species and is acceptable in this regard. The Board should note that the proposed works are to be carried out in a highly urbanised environment whereby bat species are habituated to a certain level of noise and light disturbance. The proposed works would not alter the environment to such a degree as to have a permanent negative impact on bat populations in the area. I also note that works will be carried out during daytime hours and will therefore not result in disturbance to emergence patterns in the area.

### Potential Impacts in relation to Mammals

9.293. In terms of otter, there are no breeding, rest, holt or crouching sites within the works area of the proposed scheme, no impacts are therefore expected. The applicant outlines within section 12.4.3.4.3.2 of the EIAR all of the construction elements of the scheme adjacent to the Tolka and none will encroach onto habitat utilised by otter with the exception of The proposed works at BR01 Tolka River Bridge to the south of the N3 Dual Carriageway, once installed the extent of available riparian territory for otter commute, outside of swimming under the existing bridge will reduce, for the duration of the Construction Phase to the riparian lands on either side of the watercourse to the watercourse. However, whilst this section of the commuting route will be narrowed, otter will still be able to commute freely.

9.294. Mitigation in relation to water quality will prevent any impact to availability of prey to otter. Other impacts arising from noise and light are also considered by the applicant and I am satisfied given the urban setting of the proposed scheme that the proposed scheme will not give rise to any significant impacts to otter species.

9.295. Other mammals such as badgers and marine mammals are also considered within the EIAR and no significant affects arise in relation to any such mammals as a result of the proposed scheme.

Potential Impacts in relation to birds

9.296. It is important to note that the applicant has examined the potential for impacts to arise in relation to overwintering bird species within the Appropriate Assessment section of this report and as such in the interest of conciseness these details will not be repeated hereunder, and accordingly this section of the report should be read in conjunction the Appropriate Assessment above in relation to over wintering bird species.

9.297. Nonetheless, it is important to note that there will be no loss of feeding habitat to overwintering birds as a result of the scheme.

9.298. As mentioned above Kingfisher are known to utilise the Tolka River and as such the potential for impacts to arise in relation to this species has been considered within the EIAR. The Board should note that no nesting habitat was recorded in close proximity to proposed works at any watercourse crossing, the survey results recorded a number of suitable bank faces approximately 350m upstream, outside of the works area. In terms of noise disturbance, the proposed works are within a highly urbanised environment and construction works noise will not exceed current recorded noise levels at these locations. Thus, given the nature of the proposed works and the location of the works within an urban environment dominated by vehicular traffic noise, I am satisfied that significant impacts to Kingfisher will not arise.

9.299. Overall, I note that none of the habitat areas to be lost are not unique to the locality and, the applicant states that either individually or collectively these areas are not likely to support a significant proportion, or the only population of any given breeding bird species locally.

9.300. Habitats for other common birds that are affected by the development form part of larger expanses of similar habitat types and mosaics in the wider locality. Parks and greenspaces form a vital resource for breeding birds within an urban setting. These areas of suitable breeding bird nesting and/or foraging habitat are available in the wider locality of the Proposed Scheme. Impacts to birds in this regard are not expected to be significant.

9.301. Habitat loss in the general sense will arise along the full route and will occur in the form of permanent land take of edge habitats adjacent to the existing road network, or as temporary land take to facilitate construction activities. Such habitats are identified as being of Local Importance (Higher Value) and Local Importance (Lower Value). As mentioned above habitats impacted by the development are commonly found in urban settings and comprise of grass verges, trees, hedgerows, ornamental planting or scrub etc and given their location in highly trafficked urban areas are highly disturbed. Overall, considering all habitat types to be lost, their extents and the surrounding habitats beyond the Proposed Scheme boundary, I am satisfied that the potential impacts will not result in a significant effect at any local geographic scale.

9.302. In terms of disturbance, as mentioned above the proposed works are to be carried out within the carriageway and edge of carriageway, birds within this environment would be habituated to urban noise levels. The magnitude of impact is heavily dependent on the type of construction works to be carried out and I note overall that no significant effects are likely to arise.

9.303. Overall disturbance will be temporary as construction proceeds along the scheme and will not give rise to significant permanent effects.

#### Mitigation for Birds

9.304. Mitigation measures for the protection of birds is outlined in section 12.5.1.5 of the EIAR and relates to the following:

- Retention of vegetation where possible.
- Construction of BR01 Tolka River Bridge will be undertaken during the kingfisher breeding season (generally taken as March-early July inclusive).
- The preparatory site works alongside the River Tolka at BR01 Tolka River Bridge will commence in Year 1 Q2. Following the installation of sheet piling, the appointed contractor will provide site hoarding of 2.4m height between the sheet piles and the watercourse to mitigate potential impacts associated with protected species (Otter and Kingfisher). The hoarding will be installed to retain the existing maintenance access path under the bridge. In this way, as kingfisher activity increases along the watercourse, they will be isolated, as far as is practical from the works area, although significant noise disturbance from

machinery working in close proximity to the watercourse is anticipated to be temporary in nature.

- Avoidance of the removal of habitat during breeding season, in the event that this is necessary pre works surveys will be carried out and works ceased if birds are encountered.
- Noise mitigation measures will be employed to prevent disturbance.
- Protective fencing of vegetation close to works.

#### Potential Impact in relation to Reptiles and Amphibians

9.305. No significant impacts are expected in relation to the foregoing, as mentioned above given the limited and lack of suitable habitat for both.

#### Potential Impacts in relation to Fish

9.306. The River Tolka is known to support populations of brown trout and provides a particularly important nursery function for salmonid species, lamprey and eel along with other aquatic species. Habitat degradation as a result of effects on surface water quality on the River Tolka or Liffey system during construction, has the potential to result in a temporary likely significant effect at the local level for populations of brown trout in these watercourses and other fish species present in the river. Mitigation measures are proposed to prevent any such events from arising and subject to these measures I am satisfied that the proposed works will not give rise to any significant impacts to fish life.

#### Potential Impacts in relation to Plant species

9.307. No protected plant species listed on the Flora (Protection) Order, 2015 were recorded within or in close proximity to the Proposed Scheme. The desktop study did not reveal any records for rare and / or protected species in close proximity to the Proposed Scheme. Therefore, there is no potential for impacts on rare / protected species, as a result of the operation of the Proposed Scheme.

#### Invasive Plant Species

9.308. The applicant has recorded five areas of non-native invasive plant species listed on the Third Schedule of the Birds and Habitats Regulations (Himalayan balsam) in close proximity to, the Proposed Scheme.

9.309. In the absence of mitigation, there is potential for these species to spread or be introduced, during routine maintenance / management works, to terrestrial habitat areas in European sites downstream in Dublin Bay.

#### Mitigation for Invasive Plant Species

9.310. It is acknowledged by the applicant that such species pose a significant threat to biodiversity and as such it is proposed to carry out preconstruction surveys. An Invasive Species Management Plan has been prepared to outline the strategy that will be adopted during the Construction Phase of the Proposed Scheme in order to manage and prevent the spread of the non-native invasive plant species. This approach is common practice and known to be effective in the management of invasive species. I am therefore satisfied that the proposed development will not give rise to the spread of invasive species within or outside of the site boundaries.

#### Potential Impacts Operational Phase

9.311. The applicant has considered the potential for impacts to arise in relation to the operational phase of the development and I refer the Board to Section 12.4.4 of the EIAR in this regard. Overall, there are no significant effects expected during the operational phase of the development in relation to biodiversity. Measures such as the implementation of SUDs, directional lighting to protect bats, a monitoring and management plan for invasive plant species, restricting the timing of vegetation removal to protect birds and ongoing monitoring of the site will prevent any impacts of significance from arising. I am satisfied that the applicant has adequately considered all potential operational impacts in detail.

#### Residual Impacts

9.312. It is important to note that the EIAR within section 12.6 outlines the residual likely significant effects of the proposed development on all birds, bats, mammals, aquatic and plant species. The Board should note as outlined above that no protected species with the exception of a small number of bats commuting were found within the works area which comprises an urban carriageway within the city and suburbs and mitigation in the form of pre-construction surveys, protection of waterways and water quality are considered to prevent significant impacts from arising to species.

- 9.313. In this context I draw the Board's attention to table 12.22 of the EIAR in which residual impacts are for the most part expected not to be significant. However, I note in relation to mixed broadleaved / conifer woodland, mixed broadleaved woodland , scattered trees and parklands, hedgerows, treelines, bats, badger, otter, kingfisher and all other breeding bird species, residual effects are expected to be significant at a local level.
- 9.314. Whilst I accept that the removal of vegetation can be identified as having a significant effect, I will consider the limited level of removal in the context of the significant replanting scheme proposed to be acceptable. The applicant has clearly stated that trees identified as having potential roosting features for bats will be retained (with the exception of the 4 mentioned above to be removed) and all trees will be inspected prior to felling to ensure no bats are present. In the case of the trees to be removed, bat boxes will be erected to mitigate against significant impacts arising in relation to bats.
- 9.315. In addition, whilst the river area adjacent to the proposed scheme is within foraging distance for otters, none were encountered. Preconstruction surveys will be undertaken to ensure that impacts do not arise. Similarly, no evidence of other protected mammals was recorded during surveys. In the absence of such species being recorded and having regard to the mitigation measures proposed to ensure no significant effects arise in this regard, I am satisfied that that effects of the scheme to biodiversity will not be significant.
- 9.316. I note DCCs requirement in relation to the restriction of vegetation removal during the bird breeding season and am satisfied that this can be adequately dealt with by way of condition.
- 9.317. In relation to the operation of the development I draw the Board's attention to table 12.23 of the EIAR in which residual impacts in relation to the operation of the development. Similar to the foregoing, significant impacts are not expected for the large part with the exception of The Royal Canal pNHA, the scheme passes over the canal at the junction with the M50 and air quality issues may arise. However, having reviewed the air quality chapter of the EIAR in which no significant effects are expected and on the contrary, improvements to air quality are expected, I am satisfied that the proposed development would not give rise to any significant long term air quality impacts and is therefore acceptable in this regard.

## Conclusion

9.318. Thus, having regard to the foregoing, and having considered the written submissions made in relation to biodiversity and the relevant contents of the file including the EIAR, I am satisfied that the potential for impacts on biodiversity can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect significant impacts on biodiversity can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

## **Material Assets & Waste**

9.319. Section 18 & 19 of the EIAR examines the potential for impacts to arise in relation to waste and material assets. The study area regarding major infrastructure and utilities comprises all areas within the Proposed Scheme, including both permanent and temporary land take boundaries. The study area for waste has been carried out on a regional basis and encompasses Dublin and the Eastern-Midlands.

## Material Assets

9.320. All major infrastructure and utilities which may be impacted by the Proposed Scheme have been assessed including:

- Railway lines;
- The Royal Canal;
- Luas Red Line;
- Electricity;
- Water / Wastewater;
- Surface Water Drainage;
- Gas; and
- Telecommunications

9.321. The applicant has identified several utilities in place along and crossing the Proposed Scheme roads, the majority of which are buried within and along the roadways. These utilities include:

- ESB electricity lines (high, medium, and low voltage) and associated infrastructure;
- Gas Networks Ireland gas mains (high, medium, and low pressure) and associated infrastructure;
- Irish Water potable water mains and associated infrastructure;
- Irish Water sewer lines (foul and combined sewers) and associated infrastructure;
- Local Authority surface water drainage network and associated infrastructure;
- Eir, Enet and Virgin Media telecommunications lines and associated infrastructure;
- Local Authority traffic signal ducting; and

9.322. The Proposed Scheme will require widening of existing bridge structures on N3 Navan Road. The Proposed Scheme will also cross over the M50 motorway, the Royal Canal and the two railway lines via existing bridges. There are no works to be done to any of these bridges which will affect the operation of the motorway, canal or railway lines underneath.

9.323. The Proposed Scheme will also cross the Luas Red Line at grade in two places near the end of the Proposed Scheme. The construction of the Proposed Scheme in this area will not affect the operation of the Luas. Therefore, there are no significant impacts anticipated to this infrastructure.

9.324. A table listing all major utilities in the vicinity of the proposed scheme is outlined in table 19.5 of the EIAR and refers mainly to overhead lines and underground cables.

9.325. It is important to note at the outset that significant effects are not likely to arise in relation to the proposed development during either the construction phase or operational phase of the development.

9.326. Impacts on existing infrastructure and utilities may occur in order to accommodate changes to junction layouts or changes to carriageway widths. Where protection of

utilities in place is not an option, this will involve realignment, upgrade, or replacement of this infrastructure as part of works within those areas.

9.327. I note from the information submitted that the proposed development would require the diversion of medium and low voltage underground and overhead lines, watermains, gas mains and telecommunication ducts and chambers. These diversions will result in temporary and short-term interruptions to services in the vicinity of the proposed works.

9.328. The magnitude of effects arising from infrastructure diversions ranges between no significant impact to Negative, Moderate, Temporary. Impacts relating to each individual infrastructure element is outlined in table 19.12 of the EIAR submitted. Impacts arising to such infrastructure during the operational phase of the development relate to the use of electricity to power new traffic lights and street lighting. Overall effects are expected to be imperceptible in this regard.

9.329. In considering the impacts to material assets, I note that the applicant has also considered the impact of the development on imported materials, such as concrete and aggregate. No significant effects are expected in relation to imported materials during either phase of the development.

#### Mitigation

9.330. Mitigation in relation to material assets include the protection of existing infrastructure, protection of major utility and diversion if necessary and ongoing liaison with the utility providers throughout construction. In the event of service disruption, the public will be notified, and disruptions will be minimised in terms of duration. Materials will be sourced locally where possible. There are no mitigation measures proposed for the operation of the development as impacts are expected to be minimal during this phase of the development.

9.331. Residual impacts are not expected.

9.332. Overall, it is clear that the proposed scheme seeks to reduce the impact on material assets within the area and within the scheme itself and I am satisfied that the applicant has made adequate provisions to protect major infrastructure assets and reduce overall materials being brought into the site.

#### Waste

9.333. Construction waste, including demolition and excavation waste, will be the main type of waste generated as a result of the Proposed Scheme. Waste licenced facilities within the area have been identified and will be used according to the waste management plan which will be submitted to the Council.

9.334. It is important to note at the outset that impacts arising from waste are not deemed to be significant.

9.335. It is the intention of the applicant to monitor, manage, reduce and reuse waste where possible. Waste will be appropriately segregated. It is anticipated that up to 41,000 tonnes of recycled or reused material could be incorporated into the Proposed Scheme. All monitoring and auditing of waste will form part of the mitigation measures to reduce waste arising from the development in compliance with Article 27 of the Waste Directive Regulations.

9.336. Where practicable and appropriate, and if in reusable condition, materials to be reused include street and roadside infrastructure such as bus stops, lighting poles, traffic signals, manhole access covers and signs.

9.337. I have examined the waste estimates provided by the applicant and note the following in relation to construction waste:

- Estimates of demolition waste are outlined in table 18.8 of the EIAR and result in a total predicted amount of 2,600 tonnes which equates to 0.02% of the demolition waste in the Eastern Midlands Waste Region. The magnitude of effects relating to demolition waste when considered in the context of the region are stated to be adverse, not significant and short-term.
- Excavation waste is outlined in table 18.9 of the EIAR and a total of 165,000 tonnes is expected to be generated from the development which equates to 1.55% of the demolition waste in the Eastern Midlands Waste Region. The magnitude of effects when taken in the context of the region is stated as being adverse, slight and short-term.
- Waste also relates to waste construction materials which has been quantified by the applicant within table 18.10, whereby it is expected that 5-15% of materials used will be wasted (i.e can not be recycled or reused). Such levels

of waste are standard in construction and as such are not expected to give rise to significant impacts in the regional context.

9.338. Operational waste may arise as a result of carriageway maintenance which will be undertaken at regular intervals, or as necessary. This will primarily consist of bituminous mixtures due to maintenance of carriageway pavement. It is envisaged that bituminous mixtures will be reused within new carriageway construction as far as practicable and in accordance with all applicable legislation. It is important to note that the quantity of bituminous mixtures generated over the assumed lifetime of the Proposed Scheme (60 years), will decrease by approximately 4,550 tonnes due to an overall narrowing of the carriageway. Therefore, there will be a decrease in maintenance needs during operation of the Proposed Scheme. The magnitude of effects during the operation will therefore be positive, not significant and long term.

9.339. Given the limited percentage of waste to be generated from the site it is reasonable to state that cumulative effects arising from development along the route will not arise in this instance. The proposed development once operational will in fact reduce waste and therefore have a positive effect on waste quantities in the region.

#### Waste Mitigation

9.340. A construction and demolition resource and waste management plan has been prepared and it is stated that this will be implemented and include measures as follows:

- Stockpiling of existing subbase, capping layer and topsoil material generated on-site for direct reuse in the Proposed Scheme, where practicable, in the proposed Construction Compounds (subject to material quality testing to ensure it is suitable for its proposed end use); and
- Recycled aggregates and reclaimed bituminous mixtures will be specified in the Proposed Scheme, where practicable. For example, suitable recycled aggregates and appropriate site won material may be specified in the proposed road base / binder layers, subbase layers under footpaths / cycle tracks, and capping layer material within the road, footpath and cycle track pavement, subject to testing to ensure material is suitable for its proposed use.

- Source segregation: Metal, timber, glass and other recyclable material will be segregated (and waste stream colour coding will be used) during construction works and removed off site to a permitted / licensed facility for recycling;
- Material management: 'Just-in-time' delivery, where practicable, will be used to minimise material wastage;
- Any hazardous waste arising will be managed by the appointed contractor in accordance with the applicable legislation; and
- Waste auditing: The quantity and types of waste and materials leaving site during the Construction Phase will be recorded by the appointed contractor. The name, address and authorisation details of all facilities and locations to which waste and materials will be delivered will be recorded along with the quantity to each facility. Records will show material which is recovered, which is recycled and which is disposed of.

9.341. Overall residual impacts in relation to construction waste in terms of both the operational and construction phases following mitigation are not expected to arise. Having reviewed the relevant documents and chapters of the EIAR submitted I am satisfied that the applicant has adequately addressed waste arising from the development and has adequately employed the principles of the circular economy in this regard through the inclusion of waste materials within the project construction where appropriate and the reuse of existing materials along the route. Measures to reduce waste such as on demand delivery will further reduce waste during the construction phase is in accordance with the key tenets of the Eastern Midlands Region waste Management Plan.

### Conclusion

9.342. I considered all of the written submissions made in relation to Waste & Material Assets and the relevant contents of the file including the EIAR. I am satisfied that the potential for impacts on Waste & Material Assets can be avoided, managed and/or avoided by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on Waste & Material Assets can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development

in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

### **Risk of major accidents and / or disaster**

9.343. An assessment of the risk of major accidents or disasters is outlined in section 20 of the EIAR. In terms of potential risks, it is noted that for the large part the proposed development has a low risk to major accidents or disasters. However, I note that there is a medium risk associated with the potential of striking a main gas line, spreading of invasive species and water contamination during construction.

#### Mitigation

9.344. Mitigation is proposed in this regard, an invasive species management plan will be implemented to prevent the spread of such plants, surface water management as outlined within the water section of this EIAR assessment will prevent the contamination of surface watercourse and an emergency incident plan will also be prepared and implemented in the event of an emergency.

#### Conclusion

9.345. Following mitigation, it is stated that the risk of such incidents occurring is low and no significant residual effects are expected in this regard. I considered all of the relevant contents of the file including the EIAR in relation to risk of major accidents or disaster. I am satisfied that the potential for impacts on major accidents or disaster can be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed mitigation measures and with suitable conditions. I am therefore satisfied that the potential for direct or indirect impacts on major accidents and or disasters can be ruled out. I am also satisfied that cumulative effects, in the context of existing and permitted development in the surrounding area and other existing and proposed development in the vicinity of the site, are not likely to arise.

### **Interactions between the Factors and Cumulative Impacts**

9.346. Section 21 of the EIAR considers the potential for cumulative impacts to arise and the potential for interactions between factors to occur. Cumulative impacts are considered in the context of other permitted and planned development in the area as well as the remaining 11 other bus connects routes in the context of the foregoing sections of the EIAR. Development considered in the context of cumulative development are outlined

in Appendix 21.1 of the EIAR, over 200 projects and developments were considered in the context of cumulative impact, with 61 projects being shortlisted for the final analysis of cumulative impacts.

9.347. The applicant has also had regard to the relevant plans for the area and I am satisfied that a robust and detailed assessment of the potential for cumulative impacts to arise has been carried out.

9.348. It is important to note at the outset that no significant adverse cumulative impacts are expected. All cumulative impacts are outlined in detail within Section 21 of the EIAR and whilst I will not repeat all of the information hereunder, I will have considered the full details of this chapter in my assessment of the cumulative impacts.

### Traffic

9.349. The Board should note that all 12 busconnects were considered in the context of cumulative impacts, in the event that all 12 were to be constructed at the same time, a number of issues emerged from the modelling which gave rise to significant traffic impacts. As a result, it was determined that the following schemes would not be constructed concurrently with adjacent BusConnects Core Bus Corridor schemes so as to avoid potential traffic and associated environmental impacts:

- Ballymun/ Finglas to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Swords to City Centre Core Bus Corridor Scheme and the Proposed Scheme;
- Lucan to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Liffey Valley to City Centre Core Bus Corridor Scheme and the Proposed Scheme; and
- Templeogue /Rathfarnham to City Centre Core Bus Corridor Scheme will not be constructed concurrently with Kimmage to City Centre and Bray to city Centre Core Bus Corridor Schemes.
- Bray to City Centre Core Bus Corridor Scheme – will not be constructed concurrently with Blackrock/Belfield to City Centre and Templeogue /Rathfarnham to City Centre Core Bus Corridor Schemes.

9.350. The remaining eight schemes can be constructed concurrently or with a combination of other schemes incorporating the limitations outlined above.

- 9.351. The DART+ West (a proposed railway corridor upgrade along the Dublin to Sligo line) and the DART+ Southwest (a proposed railway corridor upgrade along the Dublin to Cork line) projects interface with the level crossing at Ashtown which is a key construction interface between the schemes. Works on both schemes will be coordinated to ensure that there is no overlap in works or construction vehicle routes between the Proposed Scheme and the DART+ scheme during their construction.
- 9.352. Metrolink is a proposed high-capacity metro system that will run between Dublin City Centre and Dublin Airport, before continuing to Swords. The Board should note that there is no direct spatial interface with the Proposed Scheme, however there is an indirect interface through traffic redistribution during both construction and operation. Co-ordination of these projects during construction will ensure that significant cumulative impacts are avoided.
- 9.353. It is stated within the EIAR that the BusConnects Infrastructure team has considered the potential for spatial and temporal overlap with these major transport projects, and they have been considered in the traffic modelling undertaken. It is not considered that the development when taken in conjunction with the Dart + West would give rise to a temporal or spatial overlap that will give rise to cumulative impacts.
- 9.354. The applicant states that coordination with the development teams for both Metrolink and Dart +West has occurred and is ongoing to ensure that no conflicts arise. I am therefore satisfied that no significant cumulative effects will arise in relation to traffic and transport.

#### Dust and air pollution & Climate

- 9.355. An appraisal has been carried out to assess the cumulative risk to sensitive receptors as a result of dust soiling and the health impacts and ecology impacts due to the construction phase of the Proposed Scheme. Other projects within 350 metres of the proposed scheme, as outlined in section 21.3.1.2.1 of the EIAR were considered in this regard. Mitigation measures to prevent dust are to be implemented as outlined within the relevant section above and as such no significant dust impacts are expected to arise in relation to the proposed scheme. Given that such mitigation is standard practice in relation to construction and excavation works, it is reasonable to state that significant cumulative dust emissions are not expected to arise in relation to other development within the area. Such mitigation measures are included within the

permitted schemes referred to and I am therefore satisfied given the limited nature of the proposed works and the measures proposed within it to avoid dust emissions, that no significant impacts will arise.

9.356. In terms of pollutants, I note that the applicant has outlined the cumulative construction phase in terms of a percentage of the regional output in table 21.4 of the EIAR and given the relatively small percentage of pollutants that the scheme will give rise to in this context, I am satisfied that no significant cumulative impacts are expected, the overall magnitude of impact is predicted as negative, not significant and short term.

9.357. Cumulative impacts in relation to climate are considered within the EIAR within a national context. The impacts to climate have been quantified within the Air Quality and Climate Section of this EIAR above and will not be repeated hereunder, however it is important to note that impacts arising from the operation of the development are positive and the proposal will result in a reduction of carbon emissions over the life of the scheme.

9.358. As mentioned above, construction impacts in terms of climate are considered to be significant this was determined in the absence of ceiling thresholds which are now provided for within the Climate Action Plan 2023. This issue has been discussed in detail above and will not be repeated hereunder. However, in the context of the proposed development as a whole I acknowledge that the scheme will ultimately have a positive impact on climate I am therefore satisfied that significant long term adverse cumulative impacts will not arise.

#### Water, soils, geology and hydrogeology

9.359. Water, soils, geology and hydrogeology are examined as a group of receptors for the purpose of the consideration of cumulative effects. Standard mitigation measures as outlined within the relevant sections above will avoid significant impacts from arising in relation to such factors and therefore no significant effects are expected. Similarly, mitigation measures to avoid such impacts also form part of the permitted schemes and I am therefore satisfied that significant cumulative impacts will not arise in this regard. It is of note however that the applicant considered 7 other projects in relation to cumulative impacts arising in relation to water I refer the Board to section 21.3.1.8 of the EIAR in this regard for further detail but note overall that impacts are predicted to be not significant.

## Noise & Vibration

9.360. Cumulative impacts in relation to Noise and vibration have been examined in the context of the proposed 12 routes and the developments listed above. Due to the distance between routes, cumulative impacts in relation to the other proposed routes are not expected. Other major infrastructure projects could directly interface with the construction of the Proposed Scheme and a total of 16 projects have been identified within the 300 m zone of influence of the proposed scheme and considered in the context of cumulative noise impacts. Given that the proposed scheme will dominate the noise environment at the nearest noise sensitive location as construction proceeds along the route, I am satisfied that cumulative noise impacts will not arise in this instance.

9.361. In relation to construction traffic noise, I note that under the cumulative construction traffic scenario, traffic noise impacts are determined to be Neutral, Imperceptible to Slight, and Temporary due to the negligible to low volume of additional traffic along the road network during the cumulative construction phase scenario.

9.362. I note that there are a small number of roads which will experience an increase in noise levels of 3dB as a result of traffic redistribution during construction. This increase is deemed to be significant by the applicant. I refer the Board to table 21.9 of the EIAR in which the affected roads are listed and in which the magnitude of effects are deemed to be moderate – significant and slight – moderate. All impacts are temporary in nature.

9.363. I note from other BusConnects applications it has been proposed to liaise with contractors of other projects to ensure that there is coordination between projects and no significant cumulative impacts arise, this is a reasonable response to noise monitoring, and should the Board be minded to grant permission, I recommend a condition is imposed in this regard.

## Biodiversity

9.364. Cumulative impacts to biodiversity relate to habitat loss, disturbance and degradation and loss of foraging, commuting habitat and fragmentation. It is important to note given the location of the Proposed Scheme and the on-going urban development trends across Dublin, there is likely to be continued habitat loss and fragmentation in the area. The applicant however has had regard to the environmental protective policies of the relevant development plan for the scheme and the scheme is compliant with same.

9.365. Cumulative impacts arising from other developments referred to above within the vicinity of the site could result in relation to bats, however I note that impacts will be no higher than the already predicted residual effects significant at the local geographic scale for the Proposed Scheme alone. Similarly for birds, impacts will be local in scale and not significant. The removal of trees will be compensated by the replanting program proposed as part of the scheme, any potential impacts will therefore be temporary in nature.

9.366. In relation to Kingfisher, disturbance may result from other developments, but suitable habitat will not be impacted by the proposed development in isolation. Any disturbance to this species will be temporary and will not impact existing or future populations.

9.367. Disturbance or displacement impacts to mammals during construction will be temporary or short-term and are not likely to have long-term population level effects, even cumulatively with any future projects that might be proposed.

9.368. In relation to fish it is expected that the proposed development will not result in any cumulative impact.

#### Archaeology & Architectural Heritage

9.369. The archaeological and cultural heritage assessment identified one project with the potential to give rise to cumulative effects during construction:

- DCC planning reference 2038/17 and ABP309657: Construction of new district shopping centre development and 175 no. residential units (3 no. houses, 29 no. Build to Rent apartments and 584 no. student bedspaces) at Park Shopping Centre and numbers 42 – 45 Prussia Street

9.370. The works near to the above development are located within the Historic City of Dublin Zone of Archaeological Potential and at RMP site of 18th/19th century house. It is stated that any remains that survive will be partial and heavily truncated by the previous development and archaeological investigations have already taken place and further mitigation will occur. The assessment identified that works can and will be archaeologically mitigated. Based on the mitigation proposed I am satisfied that the development taken in conjunction with the Bus Connects Project, will not cause an additional significant impact from an archaeological perspective.

9.371. In terms of architectural heritage, I note that the applicant has considered cumulative impacts and given that the proposed scheme itself would not have any residual impacts on architectural heritage, it is not considered that cumulative impacts will arise. This is reasonable.

#### Landscape and Visual

9.372. The landscape (townscape) and visual assessment identified 16 other projects with the potential for likely cumulative effects with the Proposed Scheme during construction. Such effects are likely to be localised and contained within the local townscape area, due to the enclosing effect of the surrounding built form. It is stated that for 13 of these projects' effects are likely to be localised Moderate and Temporary / Short-Term during construction in the local area.

9.373. For the remaining three other projects of the 16, which include:

- Irish Water IW06 project
- MP08 DART + Programme West
- MP12 DART + Programme South West

9.374. The magnitude of impacts are expected to be significant, negative, temporary / short-term effects, should construction periods overlap.

9.375. It is of note that the proposed scheme will not be constructed concurrently with the permitted Ballymum/Finglas scheme to avoid cumulative impacts on the local intervening townscape around Smithfield, interconnecting roads, the Liffey Quays and other local receptors.

9.376. Other cumulative impacts whereby no significant impacts are expected relate to waste and material assets I refer the Board to Table 21.12 of the EIAR in which regional projects in relation to cumulative waste impacts are outlined.

9.377. The Board should note that no significant cumulative impacts are expected in relation to the operation of the proposed scheme and therefore no additional mitigation is necessary in this regard.

9.378. Having regard to the very detailed information provided by the applicant in relation to cumulative effects, I am satisfied that a robust assessment of all cumulative impacts

has been carried out and I am satisfied based on the information submitted that the proposed development will not give rise to any significant cumulative effects.

### Interactions

9.379. I have considered the interrelationships between factors and whether these may as a whole affect the environment, even though the effects may be acceptable when considered on an individual basis.

9.380. I consider that there is potential for population and human health to interact with all of the other factors (biodiversity, water, air and climate, noise, landscape and visual, cultural heritage and material assets – traffic). The details of all other interrelationships are set out in Section 21 of the EIAR which I have considered.

9.381. The proposed construction phase of the development has the most potential to interact with human health and biodiversity in relation to water contamination. Spills to waterbodies of hydrocarbons, concrete wash or other chemicals can have a direct effect on human health and biodiversity. It is important to note therefore that residual impacts to water were expected to be imperceptible and as such there is no likely significant interaction between Water and Human Health or Water and Biodiversity from this Proposed Scheme during construction.

9.382. Similarly human health and biodiversity can interact with Air Quality, noise & vibration and traffic no significant impacts are expected in this regard and I am satisfied on the basis of the information provided that there is no likely significant interaction between these factors and human health. A number of trees and grassland are to be removed as part of the scheme; however, these works will be temporary in that trees will be replanted and grass areas reseeded.

9.383. Interactions between soils and water will arise but as mentioned above due to mitigation will not give rise to significant interaction. Similarly, interactions between water traffic and transport, however, all changes in traffic flows would occur within the same drainage catchments and so there would be no significant impacts from this interaction.

9.384. Interactions also occur between Landscape (Townscape) & Visual, Architectural Heritage, Archaeology and Cultural Heritage. The Construction Phase will have impacts on a number of local features of heritage value, Conservation Areas, historic

street furniture etc. Excavations may interact with archaeology, but this would be restricted to the construction phase of the development. Having regard to the mitigation measures proposed by the applicant in this regard I am satisfied that significant interactions will not arise.

9.385. Having regard to the foregoing I am satisfied that effects, as a result of interactions, indirect and cumulative effects can be avoided, managed and / or mitigated for the most part by the measures which form part of the proposed development, the proposed mitigation measures detailed in the EIAR, and with suitable conditions.

## 10.0 Recommendation

10.1. I recommend that permission is granted subject to the following conditions.

## 11.0 Reasons and Considerations

In coming to its decision, the Board had regard to the following:

**European legislation**, including of particular relevance:

- Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directives) which set the requirements for Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union, and
- Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020).

**National and regional planning and related policy, including:**

- the Climate Action Plan 2023.
- the National Development Plan 2021-2030,
- Project Ireland 2040 National Planning Framework,
- the Greater Dublin Area Transport Strategy – 2022-2042,
- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020,
- the Department of Transport National Sustainable Mobility Policy, 2022,
- the Design Manual for Urban Roads and Streets, 2019,

- the Cycle Design Manual, 2023, and
- other relevant guidance documents

**Regional and local level policy, including the:**

- Regional Spatial and Economic Strategy for the Eastern and Midlands Region

**The local planning policy** including:

- the Dublin City Development Plan 2022-2028,
- the Fingal Development Plan 2023-2029,
- the Dublin City Biodiversity Action Plan 2021-2025,
- the nature, scale and design of the proposed road development as set out in the application for approval and the pattern of development along the route,
- the entirety of the documentation submitted by the National Transport Authority (applicant) in support of the proposed development, including the Environmental Impact Assessment Report and the Natura Impact Statement, and the range of mitigation and monitoring measures proposed,
- the submissions and observations made to An Bord Pleanála in connection with the application,
- the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European Sites, and
- the report and recommendation of the Inspector including the examination, analysis and evaluation undertaken in relation to appropriate assessment, environmental impact assessment and proper planning and sustainable development of the area.

It is considered that the proposed development would accord with European, national, regional and local planning and that it is acceptable in respect of its likely effects on the environment and its likely consequences for the proper planning and sustainable development of the area.

### **Appropriate Assessment: Stage 1:**

The Board agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the following sites are the European Sites for which there is likelihood for significant effects on:

- Baldoye Bay Special Protection Area, (Site Code: 000199),
- Dalkey Islands Special Protection Area, (Site Code: 004172),
- Howth Head Coast Special Protection Area, (Site Code: 004113),
- Howth Head Special Area of Conservation (Site Code: 000202),
- Ireland's Eye Special Protection Area, (Site Code: 002193),
- Lambay Island Special Area of Conservation (Site Code: 000204).
- Lambay Island Special Protection Area, (Site Code: 000204),
- Malahide Estuary Special Protection Area, (Site Code: 004025),
- North Bull Island Special Protection Area, (Site Code: 004006),
- North Dublin Bay Special Area of Conservation (Site Code: 000206),
- North-west Irish Sea Special Protection Area, (Site Code: 004236),
- Rockabill Special Protection Area, (Site Code: 004014),
- Rockabill to Dalkey Island Special Area of Conservation, (Site Code: 003000)  
and,
- Rogerstown Estuary Special Protection Area, (Site Code: 004015),
- Skerries Islands Special Protection Area, (Site Code: 004122),
- South Dublin Bay and River Tolka Estuary Special Protection Area, (Site Code: 004024),
- South Dublin Bay Special Area of Conservation (Site Code: 000210),
- The Murrough Special Protection Area, (Site Code: 004186),

### **Appropriate Assessment Stage 2:**

The Board considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposal for the European Sites, in view of the Sites' conservation objectives. The Board considered that the information before it was adequate to allow the carrying out of an appropriate assessment.

In completing the assessment, the Board considered, in particular, the likely direct and indirect impacts arising from the proposal both individually or in combination with other plans or projects, specifically upon the European Sites,

- i. mitigation measures which are included as part of the current proposal,
- ii. conservation objectives for these European Sites, and
- iii. views of prescribed bodies in this regard.

In completing the appropriate assessment, the Board accepted and adopted the appropriate assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the Sites' conservation objectives.

In overall conclusion, the Board was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the Sites' conservation objectives.

### **Environmental Impact Assessment**

The Board completed an environmental impact assessment of the proposed development, taking into account:

- the nature, scale, location, and extent of the proposed development,
- the Environmental Impact Assessment Report and associated documentation submitted with the application,
- the submissions received during the course of the application, and
- the Inspector's report.

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development, and identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment.

The Board agreed with the examination, set out in the Inspector's report, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made in the course of the planning application.

### **Reasoned Conclusion for EIA**

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, provided information which is reasonable and sufficient to allow the Board to reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account current knowledge and methods of assessment. The Board is satisfied that the information contained in the Environmental Impact Assessment Report is up to date and complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU. The Board considered that the main significant direct and indirect effects of the proposed development, during construction and operation, on the environment are those arising from the impacts listed below.

The main significant effects, both positive and negative, are:

- Negative impacts on **human health and population** arising from construction include noise, traffic and dust disturbance to residents of neighbouring dwellings. All of these impacts are low to moderate. Adequate mitigation measures are proposed to ensure that these impacts are not significant and include adequate mitigation for operational noise.
- Benefits/positive impacts on the **Air and Climate**, the operation of the proposed development will have a significant positive effect on human health and population due to the displacement of CO<sub>2</sub> from the atmosphere arising from an increased use of public transport which will be electrified and the reduction of cars on the route. Negative impacts during construction relate to the embodied

carbon of construction materials which will have a negative significant impact but for the short term, any increase in carbon is considered significant, however the construction phase represents a significantly small percentage of the sectoral emission ceilings outlined in Climate Action Plan 2023 for the 2021-2025 carbon budget period, the proposed development represents 0.00967% of the transport emission ceiling for the period.

- Negative impacts on **Water** could arise as a result of accidental spillages of chemicals, hydrocarbons or other contaminants entering watercourses or groundwater via piling activities during the construction phase of the development. These impacts will be mitigated by measures outlined within the application documentation and can therefore be ruled out.
- Negative impacts on **biodiversity** relate to the removal of habitat in the form of hedgerows and treelines. Such impacts are not considered significant and can adequately be mitigated for within the scheme. Vegetation will be planted in the vicinity to bolster existing treelines and hedgerow. Significant impacts are therefore not expected in this regard. The avoidance of trees with roosting potential for bats and the maintenance of commuting corridors, as well as preconstruction bat surveys will ensure significant impacts to bats are avoided. Adequate mitigation measures including compensatory planting and pre-construction surveys, are proposed to ensure the protection of sensitive flora and fauna encountered and to prevent the spread of invasive species. Significant impacts to biodiversity can therefore be ruled out.
- **Noise and Dust** impacts arise during the construction phase from construction activities. These impacts will be mitigated through adherence to best practice construction measures in relation to dust and the use of noise abatement at sensitive locations. Significant noise impacts arise in relation to construction noise during nighttime and weekend hours when thresholds are lower. Works will generally be carried out in daytime hours causing no significant effects. In the event that works are required during nighttime or weekend hours, liaison with residents in this regard and the use of noise abatement will reduce the level of impacts. Noise disturbance from the operation of the development can be ruled out, electric bus fleet and less cars will have a positive impact on operational noise. Significant impacts arising from noise and dust disturbance during the

construction, operational and decommissioning stages can therefore be ruled out.

- Negative **traffic** impacts arise during the construction phase of the development, these impacts will be mitigated through the implementation of a traffic management plan and a construction management plan. Whilst some localised impacts arising from road closures may arise, significant impacts arising from traffic can be ruled out.
- The Environmental Impact Assessment Report has considered that the main significant direct and indirect effects of the proposed development, during construction and operation, on the environment would be primarily mitigated by environmental management measures, as appropriate.
- The Environmental Impact Assessment Report has considered that the main significant direct and indirect and cumulative effects of the proposed development on the receiving environment. Following mitigation, no residual significant long-term negative impacts on the environment or sensitive receptors would occur.

Having regard to the above, the Board is satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment. The Board is satisfied that the reasoned conclusion is up to date at the time of making the decision and that the information contained in the Environmental Impact Assessment Report complies with the provisions of Article 3, 5 and Annex (IV) of EU Directive 2014/52/EU.

### **Proper Planning and Sustainable Development**

The proposed road development would deliver a key component of the National Transport Authority's Bus Connects programme with the stated aim to improve bus services across the country. It would also provide safer infrastructure for pedestrians and cyclists and would deliver sustainable connectivity and integration with other transport services. The public realm along the bus corridor would also be improved.

The Board considered that the proposed road development, subject to compliance with the conditions set out below, would be in accordance with national, regional and local planning policies, including multiple policies and objectives set out in the Dublin

City Development Plan 2022-2028 and the Fingal County Development Plan 2023-2029 and having regard to all relevant provisions, including zoning objectives, at or adjoining the overall scheme area. It is further considered that the need, justification and purpose of the proposed road development has been adequately demonstrated, that it is acceptable in terms of its likely effects on the environment and that an approval for the proposed road development would be consistent with national climate ambitions and with the relevant provisions of the Climate Action Plan 2023 through the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets. The proposed road development would, therefore, be in accordance with the proper planning and sustainable development of the area.

### **Conditions**

1. The proposed development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the proposed development shall be carried out in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. (a) All mitigation, environmental commitments and monitoring measures identified in the Environmental Impact Assessment Report shall be implemented in full as part of the proposed development.  
(b) All mitigation and environmental commitments identified in the Natura Impact Statement shall be implemented in full as part of the proposed development.

**Reason:** In the interest of development control, public information, and clarity.

3. In accordance with the Environmental Impact Assessment Report, a suitably experienced and qualified ecologist will be appointed by the contractor. The

ecologist will advise the contractor on ecological matters during construction, communicate all matters in a timely manner to the developer (National Transport Authority) and statutory authorities as appropriate, acquire any licences/consents required to conduct the work, and supervise and direct the ecological measures associated with the permitted scheme. Where appropriate, monitoring shall undertaken by specialists. Monitoring schedules shall be included in Site Specific Habitats Protection and Re-instatement Method Statements.

**Reason:** In the interest of environmental protection.

4. Prior to the commencement of any works associated with the development hereby permitted, the developer shall submit a Construction Traffic Management Plan and a Construction Stage Mobility Management Plan for the construction phase of the development for the written agreement of the planning authority. The Construction Stage Mobility Management Plan shall promote the use of public transport, cycling and walking by personnel accessing and working on the construction site. The agreed Construction Traffic Management Plan and Construction Stage Mobility Management Plan shall be implemented in full during the course of construction of the development.

**Reason:** In the interest of traffic safety and promoting sustainable travel during the construction period.

5. In accordance with the Environmental Impact Assessment Report, all works to Protected Structures, and Structures of Cultural heritage interest shall be monitored and recorded by an Architectural Conservation Specialist, Re-instatement Method Statements shall be submitted to the planning authority to be held on file. The Architectural Conservation Specialist shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. Any features of new architectural heritage shall be made known to the Conservation Section of Dublin City Council as soon as is practicably possible.

**Reason:** In the interest of environmental protection.

6. Noise monitoring shall be carried out during the construction phase of the proposed road development by the developer to ensure that construction noise threshold levels ( $L_{Aeq}$ , period) shall not exceed the levels set out in Table 9.7 (Construction Noise Threshold (CNT) levels for the proposed scheme) of Chapter 9 (Noise and Vibration) of the Environmental Impact Assessment Report. During the construction phase, noise monitoring shall be carried out at representative noise sensitive locations as the work progresses along the scheme to evaluate and inform the requirement and/or implementation of noise management measures. Noise monitoring shall be conducted in accordance with ISO 1996–1 (ISO 2016) and ISO 1996–2 (ISO 2017).

**Reason:** In the interest of management of construction noise and protection of adjoining amenities.

7. Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the relevant planning authority for such works in respect of both the construction and operation phases of the proposed development.

**Reason:** In the interests of environmental protection and public health.

8. Any new or improved surface water outfalls shall be constructed in a manner which protects riparian habitat and does not result in excessive erosion of such habitat.

**Reason:** In the interest of habitat protection.

9. Prior to commencement of development, the developer, and/or any agent acting on its behalf, shall prepare in consultation with the relevant statutory agencies, an updated Construction Environmental Management Plan (CEMP), incorporating all mitigation measures indicated in the Natura Impact Statement and Environmental Impact Assessment Report and a demonstration of proposals to adhere to best practice and protocols.

The updated CEMP shall also include details of intended construction practice for the development, including hours of working, compound/works area lighting, noise management measures and surface water management proposals.

The construction of the development shall be constructed in accordance with the updated CEMP.

**Reason:** In the interests of protecting the environment, the landscape, the integrity of European Sites and sensitive receptors and in the interest of public health.

10. The developer shall monitor queuing time / delays at each works location and record traffic flows on the local road network at locations to be agreed with the planning authority. Such monitoring information shall be provided in a report to the planning authority on a weekly basis.

**Reason:** In the interest of orderly development.

11. Prior to the replacement of trees, hedging and planting which is to be removed the National Transport Authority shall liaise with the relevant landowner with regard to the species, size and location of all replacement vegetation. The National Transport Authority shall also employ the services of an appropriately qualified arboriculturist and Landscape Architect for the full duration of the proposed works to ensure landscaping and tree works are implemented appropriately.

**Reason:** In the interests of visual and residential amenity.

12. Tree protection measures for all existing trees shall be put in place prior to the commencement of development or phases of development.

**Reason:** In the interest of the protection of biodiversity.

13. All details of soft landscaping shall be submitted to the planning authority prior to implementation.

**Reason:** In the interest of orderly development.

14. Comprehensive details of the proposed public lighting system to serve the proposed scheme shall be submitted to and agreed in writing with the planning authority, prior to commencement of development.

**Reason:** In the interests of public safety and visual amenity.

15. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall –

- (a) employ a suitably-qualified archaeologist who shall monitor all site investigations and other excavation works, and
- (b) provide arrangements, acceptable to the planning authority, for the recording and for the removal of any archaeological material which the authority considers appropriate to remove. In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

All archaeological pre-construction investigations shall be carried out in accordance with the details specified with the Environmental Impact Assessment Report submitted with the application.

**Reason:** In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

16. Prior to the commencement of development, the applicant shall submit an Invasive Species Management Plan to the planning authority, which includes details of a pre-construction survey to be carried out. The plan shall include full details of the eradication of such invasive species from the development site prior to construction or if discovered during construction as soon as is practicably possible.

**Reason:** In the interests of nature conservation and mitigating ecological damage associated with the development.

20. (a) Trees to be felled shall be examined prior to felling and demolition to determine the presence of bat roosts. Any clearance works shall be in accordance with the Transport Infrastructure Ireland Guidelines for the Treatment of Bats During the Construction of National Road Schemes.
- (b) No ground clearance shall be undertaken and no vegetation shall be cleared from the 1<sup>st</sup> day of March to 31<sup>st</sup> day of August, unless otherwise agreed with the planning authority.

**Reason:** In the interest of protection of local biodiversity.

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Sarah Lynch  
Senior Planning Inspector

27<sup>th</sup> March 2024

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

## **Appendix I - Third party submissions**

### **Appendix 1**

#### **1. Pat Allison**

- Requests an Oral Hearing.
- Concerns in relation to format of consultation and lack of notification of the development.
- Concerns relating to lack of information provided and lack of detail on drawings.
- Concerns relating to loss of trees, impact to amenity resulting from the proposed works, safety of school children.
- Significant trees have been photographed and identified along the Navan Road, and the respondent objects to the removal of these trees.
- Reference to studies relating to health benefits of trees in a locality and concerns are raised in relation to the potential for the removal of trees both within the roadside and private gardens to impact residents' health.
- Objects to removal of roundabout and trees at Ashtown Roundabout.
- Objects to movement of bus stop closer to Cabra Convent Secondary School.
- General concerns raised in relation to safety of children entering and leaving nearby schools.
- Concerns in relation to island bus stops and the impact to disabled bus users.
- Concerns over impact to parking of hearses and cars at funerals outside the church.
- Triple glazing is requested to be installed in all properties where trees are to be removed.
- Concerns that changes to turning manoeuvres will increase traffic on Navan Road.

## **2. Annamore Park Residents Association**

- Concerns are raised in relation to access from North Circular Road via Annamore road is being closed, this change will significantly increase the time to get to the North Circular Road impacting both volunteers for the elderly who collect pensions etc and commuters.

## **3. Aughrim Street Residents Association**

- Concerns are raised in relation to timing of public consultation.
- Rerouting proposals will increase congestion on Aughrim Street and impact operation of School and church on this street.
- Concerns in relation to traffic modelling accuracy.
- Call to relax bus gate on Manor Street and Bus Corridor on Prussia Street during non peak hours and at weekends.
- Left turn bans to be implemented to prevent rat runs on Oxmantown Road.
- Pedestrian crossing at junction with Aughrim St. and Cowper St to serve both school and church.
- Air quality to be monitored.
- Improved public realm should be provided along Aughrim St.

## **4. Edel Behan**

- Changes made prior to lodgement of file to ABP.
- Oral hearing requested to discuss changes.
- Objects to changes in Monck place and Avondale Ave will landlock 400 houses.
- No improvements to road safety proposed in these areas.
- Changes will create more congestion at Doyles Corner.
- Changes will give rise to air pollution.
- Displaced traffic is routed past the primary school on St. Peters Road.

- Concerns regarding road safety due to changes at St. Peters Church junction.

#### **5. Colm Bodkin**

- Concerns relating to traffic volumes on Charleville Road and considers the proposed scheme will exacerbate the situation.
- Alterations are suggested including making Charleville Road access only or restricted in rush hours.
- Lack of consultation.

#### **6. Dr. Aoife Bourke & Dr. Megan Wilson**

- Overall support for scheme.
- Changes to Connacht Street are not clear in terms of the overriding objective.
- Concerns relating to safety of road users, accessibility to services and increases in air pollution.
- Scheme does not allow for any circular travel.
- Documentation is cumbersome and cumulative impacts are not appropriately considered.
- Oral Hearing requested – no consultation on changes made prior to submission.
- Changes agreed with other areas have a knock on effect on the third party's locality.
- Connaught St. has existing traffic congestion which will be significantly exacerbated by the scheme with no safety improvements for other users of this street.
- Footpaths are narrow and no dedicated cycle lane.
- 7 no. schools are accessed via Connaught St. safety measures are required for access to these schools.
- Impact to accessibility for emergency vehicles.

- Reducing traffic on larger roads to increase it on narrow roads does not make sense.
- 80% increase in traffic flows is not low impact. Multiple other such increases are referred to.
- Lack of consistency and clarity in documentation, reference is made to three junctions within the scheme and the documentation and plans associated.
- Concerns over modelling.
- Impacts of closing junctions to local residents does not appear to have been considered.
- Data is out of date due to recent road closures which has resulted in reduced road capacity.
- No mitigation or monitoring of surrounding road networks is proposed.
- Concerns raised in relation to noise and vibration and the level of impact expected.
- Road safety audit does not include the most up to date junction designs.

#### **7. Susan, Juliet, Beatrice Bowers**

- Changes to road access will increase journey times and will impact elderly people in the area.
- Concern raised over lack of consultation.

#### **8. Rachel Byrne**

- Submission relates to Monck Place, Avondale Rd, Avondale Ave, Leslie Buildings and Great Western Square.
- Creation of rat runs is unacceptable.
- Measures proposed by the NTA at these locations are welcome and it is acknowledged that such measures are necessary to enable better movement for all residents of the city.

### **9. Cabra Park Residents Association**

- Submission relates to traffic implications for St. Peters Road where congestion is already an issue due to narrow road width and school.
- Traffic to increase on road by 80%, and is stated as being a low impact.
- Cumulative impacts in relation to redevelopment of Dalymount.
- Oral Hearing is requested.

### **10. Dara Cassidy & Séan MacAmhlaigh**

- Concerns relating to consultations.
- Scheme is based on assumptions in relation to other schemes, this is not acceptable.
- Traffic modelling appears to be based on Covid data, this is not acceptable.
- Scheme will not provide adequate alternative to car journeys.
- No justification for removal of parking on Prussia St and others.
- Scheme does not address outbound rush hour traffic in the evening hours.
- Overall scheme has been designed in haste without appropriate consultation.

### **11. Brian Chadwick**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson.

### **12. Dr. Lucy Chadwick**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson

### **13. Stephen Clancy**

- Same submission as Rachel Byrne above.

#### **14. Jim Clarke**

- Proprietor of Phibsborough House
- Concerns relating to accessibility for deliveries and right turn onto Phibsborough road.

#### **15. Jonathan & Anne Clarke**

- Existing bus routes are fine, too many stops on routes.
- Proposed to make Navan Road one way inbound and Blackhorse Ave one way outbound.
- Existing cycle lanes are adequate.
- New works on Navan Road will further discourage residents from crossing the road.

#### **16. Connaught St residents Association**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson

#### **17. Connecting Cabra**

- Annamoe Rd & Annamoe Terrace junction is too wide, proposals to narrow this junction are outlined in submission.
- Courtesy pedestrian crossing at to shops at Annamoe Terrace.
- Greening out of footpath is recommended.
- Support 30kmphr speed limit.
- Connect to Ratoath Rd cycle route.
- Traffic calming measures on Glenbeigh Rd required.
- Design does not meet DMURS standards.
- Concerns relating to enforcement of bus gates and restricted turns.
- Lack of safe cycle infrastructure to schools on Ratoath Rd.

#### **18. Cllr Pamela Conroy**

- Concerns that scheme does not take the opportunity to make infrastructure improvements.
- In some instances the scheme results in worse active travel.
- Slip lanes should be removed as contrary to DMURS, replace with left turning lanes and with reduced kerb radii.
- Cycle routes around shopping centre to be considered.
- Cycle infrastructure around shopping centre should not be shared with pedestrians.
- Cycle lanes end abruptly at each end of road, this will give rise to safety issues.
- Cycle route along Old Navan road – no clear cycle path along this route – option to apply quiet street at this location.

#### **19. Dominic Cooney**

- Objects to proposal as it will cause a disconnect with population and reduces rights and freedoms.
- Proposal will affect businesses in Stoneybatter.
- Proposal restricts access from north, customers from this area drive as they are elderly.
- Loss of parking will discourage customers.
- Bus gate should be relaxed between 10am and 4pm.
- Short stay car parking in loading bays should be provided.
- Loading bay should be provided at 21 Manor Street.

#### **20. Susan Crowe**

- Concerns relate to Connaught st.
- Lack of consultation regarding changes prior to lodgement to ABP.
- No mitigation in areas where traffic is to be diverted to.
- Impacts in relation to increase in air pollution in area.

- Curtailment of access to both recreational, education and medical facilities in the area.
- Cumulative impact with Finglas/Ballymun Corridor will have a detrimental impact on Connaught St.
- The information submitted as part of this application is very difficult to read and follow for members of the public.
- Project corridor is not provided in documentation.
- There are three road restriction changes proposed in the CPO application for the Blanchardstown Bus Corridor, none of which were set out in any of the proposed designs issued for public consultation since the Bus Connects project commenced in 2018.
- A number of changes were negotiated at a local level with residents' groups, in particular Annamoe Road and Annamoe, significant changes to the original proposal has dire consequences for the Connaught St area.
- NTA have not made changes are requested by residents.
- Proposal will increase traffic by 200-300 vehicles per hour during morning peak, this street is already congested.
- Oral Hearing is requested.
- Restricting general traffic from the Old Cabra Road coupled with the no through access southbound on Annamoe Terrace and Annamoe Road plus no southbound access to the North Circular Road from Charleville Road means that all Cabra to Stoneybatter traffic will now be displaced as far as St Peter's Church junction in Phibsborough or to Skreen Road and Blackhorse Avenue.
- Connaught Street now has to deal with displaced traffic coming from two opposing directions- southbound traffic from Cabra and southbound traffic from Glasnevin.
- Connaught St is narrow, there is no cycle infrastructure and there are seven schools that are accessed predominantly from the Connaught Street / Fassagh Avenue / Road corridor yet no 6 protections or mitigating

measures have been put forward for active road users arising from increased road traffic flows.

- Concerns relating to accessibility of street to emergency vehicles.
- Traffic increases on narrow roads to provide traffic decreases on large roads does not make sense.
- Traffic modelling baseline data is incorrect.
- 80% increase in traffic flows is not low impact. Multiple other such increases are referred to.
- Lack of consistency and clarity in documentation, reference is made to three junctions within the scheme and the documentation and plans associated.
- The NTA at the meeting were clear that the modelling undertaken on traffic flow as shown in the tables in Chapter 6 is only in relation to the Blanchardstown Bus Corridor so the compound effects of all the corridors and in particular the Finglas/Ballymun corridor which will also massively impact my area and has not yet been brought forward for planning permission.
- Road closure documentation is unclear, whilst clarified by NTA at meetings their approach is not clear on maps. This relates to Annamoe Terrace & Road, Charleville Road and right turn at St. Peters Church.
- In relation to the Ballymun / Finglas Corridor, this route will impact the centre of Phibsborough and Connaught Street/Fassaugh Avenue/Fassaugh Road. Without combined modelling of these 2 proposed corridors, it is impossible to get a true picture of the potential issues that BusConnects raises for Connaught St.
- The closing on Monck Place and the Phibsborough junctions results in all the residents from Phibsborough, Phibsborough Avenue, Spire View, Castle Terrace, Avondale Avenue, Norton's Avenue, Monck Place, Leslie's Buildings, Avondale Road, Great Western Square and Great Western Villas approximately 200+ residential units, will have to exit out

onto the Avondale Road/North Circular Road junction, regardless of where they wish to travel in the city.

- In relation to chapter 6 of EIAR – Traffic and Transportation –
  - It should be noted that the transportation modelling calibration and validation used for the strategic model and micro-simulation models feeds into all other sections of the EIAR in terms of proposed traffic volumes throughout both the route and the surrounding roads which will be affected. This in turn feeds into the impacts associated with the Construction Phase and the Operational Phase and the necessary mitigation measures required to alleviate some of these impacts.
  - Since the baseline studies were completed there have been a number of major road closures and alterations in the area from Phibsborough to the City Centre. These include the permanent closure of Grangegorman Lower and Capel Street, the reduction of the North Quays to a single lane to provide for new cycling lanes, a segregated cycling lane from the canal to the Liffey along Constitution Hill.
  - The applicants have not provided any evidence to prove that the surrounding road network has the capacity to accommodate the redistributed general traffic.
- In relation to Air quality chapter 7
  - Baseline Air quality is 3 years out of date.
  - Data was collected over too short a period.
  - Applicants have not properly considered air pollution increases on Connaught St.
- In relation to noise and vibration chapter 9 of the EIAR
  - Surveys were undertaken during Covid. Baseline data is not accurate to normal levels of activity.
  - Predictions are not accurate.

- Road safety audit does not include the most up to date junction designs.

#### **21. Brendan & Anne Curran**

- Concerns relating to consultation and changes made prior to lodgement to ABP.
- Oral Hearing requested.
- Concerns relate to impacts to Connaught St, Fassaugh Avenue, Fassaugh Road.
- Concerns outlined are similar in nature to the foregoing in relation to the impact of displaced traffic on Connaught St.
- Road safety around schools and commuting to schools.
- Similar concerns relating to baseline data used for traffic modelling – these have been outlined above and will not be repeated.

#### **22. Thomas Curtin & Karina O'Leary**

- Concerns relate to the removal of the Ashtown Roundabout.
- Works will create additional traffic on Navan Road, traffic calming measures are therefore required.
- Absence of measures to discourage use of cars.
- Works will affect accessibility of the third party's property.
- Objection to removal of trees.
- Condition low noise road surfacing.
- Concerns relating to removal of right turn lane onto Ashtown Grove.

#### **23. Jeff Dalton**

- Objection to reduction in footpath width, removal of trees, grass margins and reduction in private gardens, removal of 122 bus service,
- Scheme will cause congestion and create rat runs,
- Concerns relating to road quality of Blackhorse Ave – flooding issues, poor alignment.

- Objection to removal of Ashtown roundabout.

#### **24. Deerpark Area Residents Association**

- Objection to scheme
- Poor consultation
- Junction at Blackhorse Ave and Ashtown Gate needs redesign.
- CPO is being used as a fast track mechanism.

#### **25. Donal Reilly & Collins Solicitors.**

- Relates to 20 Manor Street, 67 Prussia Street, 14 Mount Temple Road & 1 Manor Mews.
- Proposed works will increase journey times to business premises, increasing congestion and pollution.
- Proposed works and restrictions on streets are excessive.
- Object to removal of car parking spaces, many properties are residential and removal of parking will significantly impact these properties.
- Given the width of Manor Street it is unclear why parking spaces are being removed.
- Traffic flows are unimpeded on Prussia Street, justification for removal of parking on this street is also unclear.
- Works at St. Josephs Road eastern end will block the third party's rear entrance to 67 Prussia St.
- Concerns relating to change in traffic flows along Oxmantown Road.
- Works will have a significant negative impact to trading.

#### **26. Garbhan Doran & Helen McLoughlin**

- Traffic management proposals for junction at Phibsborough Road and Monck Place are punitive.
- Whilst works will discourage the development of a rat run, they also make accessibility to residents difficult.

- South bound traffic should still be permitted to turn onto Monck Place.
- Unacceptable level of traffic diverted onto Connaught St as a result of works, the aforementioned changes would alleviate this.
- Traffic calming measures should be placed on Avondale Ave.

## **27. Eamon Doyle**

- Lack of consultation
- Concerns relating to noise and vibration.
- Loss of property value due to loss of garden area.
- Objects to removal of trees.
- Closure of old Cabra Road will lead to congestion.

## **28. Dublin Commuter Coalition**

- Concerns in relation to Dublin junction compared to Dutch junction.
- Concerns in relation to two stage crossings.
- Concerns relating to shared space with cyclists and pedestrians.
- Concerns regarding size of island bus stops and potential to conflict with pedestrians.
- Lack of cycle infrastructure at Snugborough Junction to the M50.
- Changes are proposed to the junction at Blanchardstown Rd and Old Navan Road and the Blanchardstown and Blakestown Way.
- Lack of clarity in relation to Blanchardstown Station layout.
- Too many interruptions to bus lane from Blanchardstown station to Snugborough Junction.
- Lack of cycle infrastructure between Snugborough junction and Auburn Road.
- Concerns relating to Auburn Ave junction.
- Quiet Street details are unclear.
- Objection to shared space at junction of Brunswick Street north and Stoneybatter.
- Pedestrian waiting points are needed at all junctions.

- Supports interventions to traffic flows in Stoneybatter.
- Junction at Phoenix Park should be changed to a Dutch style junction.
- Access over Navan Road into station is poor.

### **29. Dublin Cycling Campaign**

- Objection to outer section of scheme.
- Oral Hearing requested.
- Supported changes are listed.
- Blanchardstown centre need public realm improvements.
- Refers to DMURS requirements.
- Junctions are too wide.
- Pedestrian infrastructure is inappropriate.
- Concerns are raised in relation to high speed limits.
- Clarity in relation to drawing detail is required.
- Concerns in relation to methodology of cycle infrastructure assessment.
- Proposal does not link up with Dart West.
- Reference to missing cycle connection in Cabra.

### **30. Ann Duffy**

- Relates to area outside of 168 Navan Road –
- Objection to removal of layby – used by parents for drop off
- Objects to removal of grass verge and trees.

### **31. Alan Fitzgerald**

- Concerns relating to use of Charleville Road, Monck Place and Annamoe Road and Terrace and lack of consultation on such changes.
- Concerns relating to the accessibility of the area as a result of changes to road use.
- NTA does not have relevant powers for CPO.

### **32. Gary Fitzgerald**

- Same submission as Alan Fitzgerald, see above.

### **33. Senator Mary Fitzpatrick**

- No park and ride
- Concerns relating to the accessibility to the local area for local residents who cannot use public transport.
- Increase in congestion in Phibsborough village.
- Width of footpaths at 142 Navan Rd is insufficient.
- Trees to be removed to be replaced with mature trees.

### **34. Philomena Fortune – 1070(1) 1d**

- Objection to tree removal. Removal of Ashtown Roundabout, lack of consultation.

### **35. Brian Fowley & Lorraine Rowland**

- Consideration of local access only needs to be included in plan to facilitate local residents.
- Current proposal will create congestion.

### **36. Miriam Gill**

- Objects to use of Charleville Road – increase in emissions and creation of a rat run.
- Compliance with Climate Action Plan is required.
- Right turn at St Peters Church is not practical.
- Concerns relating to quality of consultation carried out.
- Noise
- Increase in congestion from diverted traffic.
- Modelling based on inaccurate data.
- Identification of low impact in relation to 70% increase in traffic is incorrect.

### **37. Thomas Good**

- Concerns in relation to removal of Ashtown Roundabout, removal of trees which is contrary to Development Plan, quality of cycle lanes and the development of Blackhorse Ave as a cycle way.
- Access to property due to traffic changes.
- Lack of consultation.

### **38. Declan Hannigan & Judith Hannigan**

- Concerns relating to consultation.
- Similar issues raised in relation to Connaught Street / Fassaugh Avenue / Road and congestion and increases in traffic flows to surrounding roads.
- Similar issues to that raised within the above submissions in relation to baseline data for modelling.

### **39. Michael Hannon**

- Concerns relating to Parkway Railway station to Old Cabra Road junction with North Circular Road.
- Trees should be replanted in appropriate tree pits– reference is made to method used in Denmark.
- Additional trees to be planted along school boundary and other institutional land boundaries.
- Reduction of cars in cities – no plan from NTA.
- Need for Park and Ride.
- Bus Gate should be provided on Old Cabra Rd.
- Works required on Castleknock Road.
- Objection to removal of Ashtown Roundabout.
- Replacement trees not suitable species.

### **40. Brendan Heneghan**

- Concerns relating to consultation and availability of documentation.
- Local Access to be considered.

- Concerns relating to bus stop relocation.

#### **41. Lorraine Hester**

- Concerns about noise, safety, congestion.
- Corner of St. Peters Church is tight.

#### **42. John Higgins**

- Objection to restriction of traffic on Annamoe Rd.
- Increase in congestion

#### **43. John Hiney – Kempton Residents Assoc**

- Objection to removal of Ashtown Roundabout,
- Concerns about accessibility to Phibsborough Rd.
- Concerns regarding accuracy of traffic modelling.
- Objection to removal of islands on Navan Rd.
- Objection to loss of trees.
- Proposed changes will not significantly improve journey times.

#### **44. Patricia Hughes**

- Concerns are raised in relation to consultation and lack thereof.
- Documentation is inaccessible.
- Impacts in terms of pollution and noise and increase in traffic flows on Connaught St.
- Submission raised similar issues to Dr. Aoife Bourke & Dr. Megan Wilson see above.

#### **45. Hilary Humphreys**

- Objects to use of Monck Place, Charleville Rd and concerns regarding impact on Phibsborough.

#### **46. Orla Jones**

- Submission raised similar issues to Dr. Aoife Bourke & Dr. Megan Wilson see above

#### **47. Dalen Kambur**

- Concerns relate to the impact of traffic at St. Peters Church turn and Doyles Corner.
- Works will create accessibility issues to shops and recreation etc.
- Lack of consultation.

#### **48. Niall & Antoinette Kavanagh**

- Object to CPO of garden at 267 Navan Road.
- Loss of parking
- Cyclist should be separated from bus route.

#### **49. Frank Keane**

- Concerns relating to health impacts
- Impacts to accessibility of home.
- Objection to timing of consultation.

#### **50. Orla Keane**

- Concerned above changes to traffic on local roads in Phibsborough area.
- Unhappy with consultation process.

#### **51. Annemarie Kiernan**

- Similar concerns to those raised above in relation to the impact of the development of Connaught St, Fassauga Ave and other local roads in the area.
- Queries accuracy of baseline data for modelling.
- Consultation concerns.

## **52. Deirdre Kirwan**

- Objection to removal of trees and garden area.

## **53. Anna Lalor**

- Objection to removal of Ashtown roundabout and trees.
- Comments relating to signage.

## **54. Kevin Lawlor**

- Relates to 1 Herbert Road
- Visual, Vibration, lighting & noise impacts
- Devaluation of property

## **55. LC Properties & investment**

- In relation to Lissan Coal Company – Filling station
- Trade will be reduced as a result of works, significant recent investment will be impacted significantly.
- TENT Engineering prepared a traffic impact report for station owners, which shows reduction in trade from 1727 passing cars to 138.
- Attack on private property rights as compensation is not offered and party is not a notice party to CPO.

## **56. Leinster Street North Phibsborough**

- Concerns that Leinster St is a rat run and concerns relate to cyclist safety.
- Air pollution.
- Similar issues are raised in relation to Connaught st and the traffic changes proposed.

## **57. Carey Lening & David Benbennick**

- Submission raised similar issues to Dr. Aoife Bourke & Dr. Megan Wilson see above

#### **58. Lorna Leatham**

- Consultation and notice period not acceptable.
- Congestion charge at M50 to be applied.
- Objection to removal of trees.
- Cycle widths too wide, objects to loss of garden.
- Compensation and accommodation works unclear.
- Lack of communication.

#### **59. Lissan Coal Company**

- Same objection to LC Properties & investment

#### **60. David little**

- In relation to Glenbeigh Road – increase in traffic to residential street, traffic calming, and enforcement required
- Traffic lights in this street will result in traffic congestion.

#### **61. Antanas Luobiks**

- Similar issues as raised above in relation to Monck Place, turning at St. Peters Church, North Circular road and Avondale Road.
- Longer journey times.
- Impact to quality of life.

#### **62. Ciarán Mac Annraoiu**

- Traffic flow out of town is acceptable.
- Objects to bus gate at Prussia Street outside of peak hours.
- Concerns raised in relation to parking availability.

- Gap between northbound bus stop 1649 on Manor St and 1911 on Prussia St is 400m which is too far.
- Enforcement required.

#### **63. Linda Marshall**

- Bus stops on Millstead on N3 too far apart.
- Pedestrian ramps and steps to overhang Mill Road to N3 objected to.
- Second pedestrian entrance on Mill Road not required.
- Relocation of bus stop on Mill Road to be considered.
- Screening to be 3 m high.

#### **64. Cllr Ray McAdam**

- Oral Hearing requested.
- Main issue relates to traffic management and impact to Phibsborough, Infirmary Road and Cabra to the Quays.

#### **65. Cllr Eimear McCormack**

- Impact to Phibsborough and Stoneybatter.
- Capacity of Nephin Road is limited.
- Increase in traffic on local roads will negatively impact residents quality of life.
- Concerns raised in relation to removal of Ashtown roundabout and changes to surrounding roads.
- Objection to closing of Old Cabra Rd.
- Objection to removal of trees.
- Concerns relating to new layout of lanes on Navan Rd.

#### **66. Brendan McElhinney**

- Concerns raised are similar to those above in relation to Monck Place, Avondale Rd, Leslie's Buildings and Great Western Square.

**67. Anne McKee**

- Same submission as Brendan McElhinney above.

**68. John McKee**

- Same submission as Brendan McElhinney above

**69. Seamus McKee**

- Same submission as Brendan McElhinney above

**70. Donnacha McKenna**

- Same submission as Brendan McElhinney above

**71. Lisa McKenna**

- Same submission as Brendan McElhinney above

**72. Cory Mifsud**

- Same submission as Brendan McElhinney above

**73. Adam Moore & Others**

- Same submission as Brendan McElhinney above

**74. Miriam Moore**

- Same submission as Brendan McElhinney above

**75. Margaret Murray**

- Concerns relate to closing of Cabra Rd and the impact of this on surrounding streets, impact during Bloom festival, how traffic will flow in general as a result of proposal.
- Similar issues are raised in relation to Ashtown roundabout, child safety, trees access to church.

## **76. Deirdre Nagle and Dermot Nagle**

- No new issues are raised, concerns relate to trees, accessibility of area removal of garden areas, Cabra Rd Bus gate, impact of diverted traffic and access to church.

## **77. NAMA**

- Changes to Ashtown roundabout are supported.
- Connectivity between Dart West and Bus Connects is essential – north end of bus connects needs to meet and align with the southern extent of Dart west.
- Relocation of bus stops at east of Ashtown junction further west.
- Overall support for scheme.

## **78. Navan Road Community School**

- Objects to removal of Ashtown Roundabout.
- Lack of engagement with NTA.
- Objects to removal of trees and lack of replacement trees.
- Object to timing of consultation.
- Existing gas utilities are due to be decommissioned and therefore trees should be planted regardless of pipe work.
- Park and Ride facilities are required.
- Concerns in relation to bus gate at Old Cabra Rd with regard to knock effect of traffic congestion.
- Objects to 'No Right Turn' onto Blackhorse Ave from Castleknock.
- Noise reduction works to properties should be provided.
- No cumulative assessment with Dart West.
- Concerns in relation to Island Bus stops.
- Bicycle stands are too close to bus stops.

#### **79. Brianán Nolan**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson see above

#### **80. Jennifer O'Brien and & Antony Barta**

- Concerned about impact to Stoney Batter with a specific concern about the use of Montpelier hill as a "rat run" from Arbour Hill and the City Centre through to Infirmary Road.
- Similar issues are raised to those above in relation to trees, accessibility to shopping and accuracy of data for modelling.

#### **81. Kieran O'Brien**

- Objects to restriction of traffic from Castleknock road to Blackhorse Ave.
- Lack of consultation with residents and OPW.

#### **82. Nick & Susan O'Brien**

- Objects to loss of trees and roundabout.
- Concerns relating to road safety and congestion.

#### **83. Eamon O'Cellaigh**

- Concerns relate to resident access along Old Cabra Road.
- Suggested changes to facilitate local access.
- Proposal will increase congestion.

#### **84. Miriam O'Dwyer.**

- Submission relates specifically to Blackhorse Ave and raises similar concerns to those outlined above in relation to consultation, detail on plans, cost of submission, impacts on lack of parking, noise and

disturbance during construction, lack of space on buses, additional high density development and impact on traffic.

**85. Roderic O’Gorman**

- Similar issues to those outlined above in relation to cycling around Blanchardstown Shopping Centre, slip lanes, Lack of clear cycle path along Navan Road.
- Access to bus stops on N3 from Mill Road and impact of low wall in terms of privacy and noise buffering.
- Loss of trees and residential land.

**86. Deirdre O’Halloran**

- Objects to loss of trees and Ashtown roundabout.

**87. Raymond O’Keefe**

- Owner of Auto Rays Garage – concerns relating to changes at Monck Place etc as raised in previous submissions.
- Concerned that changes will impact access to business.
- Objects to cost of submission.

**88. Paul O’leary – Navan Road Community Council**

- Objection to removal of trees, roundabout,
- Lack of Park and Ride facilities.
- Concerns in relation to Old Cabra Road changes, proximity of bus stops to cycle stands and safety of bus stops for disabled users.

**89. Katie O’Shea**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson, see above.

**90. Katia Papkovskaia**

- Concerns relating to use of Leinster St. as a rat run to Connaught St.
- Similar concerns outlined in submission above relating to congestion, road safety and capacity and air quality.

#### **91. Ciaran Perry.**

- Similar concerns raised to those above in relation to consultation, congestion, accuracy of modelling, removal of Ashtown roundabout, works and traffic restrictions on Old Cabra Road,

#### **92. Phibsborough Village Tidy Town**

- Concerns raised in relation to accuracy of modelling baseline data, consultation period over summer months, changes to Monck Place and knock on effects, accessibility of area to emergency vehicles, air pollution and spin off congestion.
- Suggests mini parks to be developed.

#### **93. Prussia Street Traders.**

- Concerns relate to old Cabra Rd. Prussia St. Aughrim St, Manor Rd. and stoneybatter
- Issues raised relate to accessibility, increases in air pollution, accuracy of baseline data in relation to modeling consultation process and overall impact to local businesses which are listed individually, increases in journey times – routes are listed and maps supplied.
- Suggestions include the use of timed bus lanes and changes in traffic light sequencing.
- Overall concerns relate to the isolation of Prussia St.

#### **94. Rathdown road and district residents association**

- Concerns relate to the closing of the old cabra Rd. And the resultant diversion of traffic.

- Similar issues to those outlined above in relation to Monck place Charleville Rd. and Annamoe Rd,
- Alternatives are requested to be considered

**95. Catherine Reilly**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson, see above.

**96. Carl Reynolds**

- Changes to footpath outside cottages at 136 2142 Navan Rd. Footpath is not wide enough concerns for vulnerable users.
- Risk assessment should be carried out in relation to footpaths.
- Air pollution impacts and lots of trees.

**97. Clare Rudden and Richard Kinsella.**

- Oral hearing requested.
- Concerns relate to extent of impact two property from CPO.

**98. Brian Rubby & Aoife Rush**

- Similar issues are raised to those above relation to road safety, access, parking, lack of detail on plans, loss of trees, alternatives considered and impacts on congestion from diverted traffic

**99. Claire Ruxton**

- Similar issues to those raised above in relation to Monck Place and phibsborough Rd.

**100. Enda Ruxton**

- Similar issues to those raised above in relation to increases in traffic volumes and congestion, increases to journey times, impacts to residential amenity, Road width and road safety

**101. Shandong Residents' Association**

- Similar issues to those raised above in relation to traffic congestion and creation of rat runs with regard to Connaught St. and surrounding area.

**102. Senator Marie Sherlock**

- Concerns relate to changes prior to lodgment of application in the area of Monck Place.
- Oral hearing is requested
- Similar issues to those raised above in relation to traffic congestion and creation of rat runs, accuracy of baseline data and increase of traffic on narrow roads.

**103. Jackie & Bernard Smith**

- Significant concerns relating to curtailment of parking in front of property due to residents of property with additional needs and disabilities concerns also relate to additional noise and air pollution and the associated health implications.

**104. Stoneybatter pride of place**

- Similar issues raised to those above and relation to the accuracy of baseline data for traffic modelling, displacement of traffic to neighbouring streets, the creation of rat runs, air quality deterioration, road safety, impact to businesses loss of car parking, loss of loading bays, loss of public realm and impact to greening of stoneybatter initiative, additional improvements two cycle infrastructure are suggested.
- concerns in relation to lack of park-and-ride facilities linking up with rail line as Navan Rd./ Parkway station and traffic enforcement it's essential.

**105. Patricia Swan**

- Same submission as Dr. Aoife Bourke & Dr. Megan Wilson, see above

**106. Tesco**

- Proposed interventions and the synergy of Prussia street will have significant impact on accessibility and operational requirements of the park shopping centre, busquets will impact delivery and service vehicles travelling to the shopping centre
- Bus Gate on old Cabra Rd. removes Tesco's access and egress route from the Prussia Street store alternative routes are too narrow.
- The approval of the current scheme will result in the Tesco Maple center and Tesco Prussia St. Being unable to be serviced.
- Bus gates will also impact customer behavior jeopardizing the viability of both Tesco stores.

**107. Mairead Thorpe**

- All hearing requested
- Concerns relate to works proposed along the old Cabra Rd. and surrounding area

**108. Collette Timmons**

- Similar issues to those raised above in relation to loss of trees & roundabout at Ashtown, CPO of garden areas, noise pollution, traffic congestion, lack of park-and-ride facilities, location of bicycle stands in close proximity to bus stops, cumulative impact of other infrastructure projects and the tie in of same.

**109. Catherine Tobin**

- Concerns relating to increase in journey times and access to consultations.

**110. Brendan Twomey**

- Suggestion install a roundabout at the Blackhorse Avenue, Ashtown Gate, Castleknock Road junction.
- Two bus routes, viz: 37 and 70d (a single service per day) use the Castleknock Road/Blackhorse Avenue, Ashtown Gate junction. These busses rarely encounter delays on Castleknock Road. The current Bus Connect proposal would only provide modest improved access to the Bus Connect route on Navan Road while having a severe negative impact on local residents.

**111. Giuseppe Vani**

- Submission relates to take away on Manor St.
- Concerns relate to the removal of car parking spaces and loading Bay.

**112. Frank Walsh and Anthony Malone**

- Concerns relate to impact of proposed traffic management proposal on Brunswick St. north.
- this street is not suitable for vehicles over 3.5 tonnes.
- General concerns in relation to the generation of traffic congestion as a result of the proposed scheme.
- additional concerns relate to noise pollution air pollution and a lost opportunity in terms of widening footpaths and providing a safer pedestrian and cyclist environment.
- Concerns also relate to the impact of the proposed bus gate at blackhall place and the knock on effect for residents of Brunswick St. north.
- Alternative solutions are proposed and are outlined within the submission.

**113. Cllr John Walsh**

- Link from Millstead to N3 should not impact housing estate.

- Concerns in relation to aforementioned works impact to Tolka and surrounding environment.
- Tree line along old Navan Road to be protected.
- Reconsider removal of Ashtown Roundabout.
- Clarity requested in relation to 'No Right Turn' at Blackhorse Ave.
- Objection to removal of trees on Navan Road.

**114. James Ward**

- Concerns relate to impacts of scheme on Connaught Street.
- Submission is similar to Dr. Aoife Bourke & Dr. Megan Wilson, see above, no new issues arise.

**115. Gerry Weir**

- Concerns relate to impact of scheme on Charleville Rd in relation to accessibility restrictions for local residents and traffic volumes.

**116. Leo Varadkar**

- Request for consultation period to be extended.

## **Appendix II Prescribed Bodies**

### **2. Dublin City Council**

- In terms of planning policy, it is stated that the proposed development is in compliance with the RSES and is recognised as a development which will support regional growth for the Eastern and Midlands Region and the Dublin MASP. High quality bus corridors will enable and support the delivery of both residential and economic development opportunities.
- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan.
- The Council will not comment on the acceptability of the EIAR.
- The NIS is acceptable, no concerns are raised in relation to the conclusion of the NIS.
- The development is largely on road and footpaths whereby there is no specific zoning objectives, the development does pass through a small section of the conservation area of Phibsborough Village, given the nature of the development it is stated that the proposal is unlikely to have any impact on the character of the conservation area.
- The council is satisfied that the proposed development which falls within the administrative boundary of the Council will not have any excessive or undue impact on the amenities of the area.
- Temporary traffic disruption is acknowledged but long-term impacts are considered to provide for enhanced amenities.
- The scheme is fundamental to achieving the objectives of compact and sustainable growth; sustainable mobility and permeability and place making, while significantly contributing towards climate action.
- It is submitted that the proposed development must not impede the development of Belcamp Lane lands as outline in the new DCC Development Plan.

### **Environment and Transportation Comments**

- Overall strong support for proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.

- DCC links to bus information in relation to traffic flow management will be upgraded to improve this service and ensure free flow for buses. This digital improvement is necessary to ensure the scheme operates to its full potential.
- Scheme should seek to maintain existing footpath where possible and seek to improve pedestrian connectivity to bus stops.
- Where cycle lanes move behind bus stops and car parking areas, measures should be put in place to slow cyclist down.
- NTA should undertake a substantial awareness campaign and behavioural change programme.
- Changes to parking at commercial units is proposed, adequate set down for deliveries should be provided at these premises and changes to parking and road markings should be agreed with DCC.
- Where residential properties are to lose space adequate dimensions of 3mx5m should be retained to facilitate parking and adequate manoeuvring in these gardens.
- Greener and softer approach to the management of surface water drainage should be used.
- Clarity in relation to order of priority where cycleways and footpaths cross.
- Signage is recommended in this regard to protect physically disabled pedestrians.
- 1200 beds to be developed on Prussia Street, additional pedestrian facilities to be provided along the route towards Grange Gorman campus.
- SUDs to be included and agreed with DCC.
- Changes in ground levels should be modelled for flooding.

#### Archaeology

- Project runs through the Zone of Archaeological Constraint for two Recorded Monument listed on the Record of Monuments and Places –
  - ❖ DU018-020 – Historic City from Prussia Street until the southern termination of the scheme at Ellis Quay.
  - ❖ 8 Archaeological heritage features on the Record of Monuments
  - ❖ The archaeology department of the Council concurs with the broad methodology of the EIAR in relation to archaeology and monitoring.

### Conservation Department

- Some elements of architectural Heritage have been mislabelled.
- Photomontages are lacking in a number of places.
- Objects to cantilever pole at St. Vincent's Home on the Navan Road (RPS 5808)
- Signage in close proximity to 74 Manor St.
- Impact to stone setts at Sisters of Charity Convent (RPS 4872)
- Changes to public realm at St. Peter's Church may impact ACA.
- Design of bus stops needs to be carefully considered.
- Potential for impacts to arise in relation to built heritage in general.
- ACAs – Route runs through Prussia Street, Blackhall Place Concerns relate to cumulative impacts.
- Potential for impacts to arise in relation to historic kerbing, pillar boxes, lamp standards and street furniture. Protection required during construction.
- Removal of trees may impact streetscapes of RPS.
- All measures to retain and protect historic paving, setts, kerbing and Associated features should be carried out.

### Boundary treatments

- All boundary treatments that contribute to the special character of Protected Structures and their settings, ACAs and areas zoned Z2 in the City Development Plan should be retained where possible or where relocated are replaced on a like for like basis.
- All works should be supervised by an expert in architectural conservation.
- Relocation should respond to the parent structure.
- 

### General comments

- Street Furniture should be retained or sensitively relocated.
- Open spaces and gardens provide important function and should be retained where practicable.
- Loss of on street parking will place pressure on the need to alter front gardens.
- Measures to mitigate visual impact of bus stops/shelters should be used.
- Signage to be kept to minimal
- Red tarmac for cycle lanes may have impact on historic areas, an alternative colour will be required in these areas.

- Scheme will enhance a modal shift.
- Overlay of survey drawings at a larger scale over proposed drawings would have assisted in assessment.
- Scale of drawings too small, clarity in relation to quantity of compensatory street planting along route.
- Arborist and landscape architect should be appointed for duration of works to ensure trees indicated for retention are retained.
- List of recommended conditions are provided in the Appendix of the submission.

### **3. Fingal County Council**

- Supports scheme
- Clarify cycle parking solutions at bus stops this would enhance multimodal travel.
- FCC are working with MCC to develop multimodal travel along N3/M3 corridor.
- The design for the core bus corridor must be carried out in a way that does not hinder future safety and efficiency improvements on the N3 and nearby M50.
- In relation to the proposed design in the area between N3 Junction 1 (M50 J6) and N3 Junction 2 (Snugborough): -
  - Fingal County Council is concerned with the alterations proposed to the existing diverge lane between the Mill Road bridge and the access road to James Connolly Hospital. It would appear from the drawings that this taper diverge lane is being foreshortened due to the construction of the new bus lane. This is likely to give rise to traffic weaving, safety, and operational issues at this location on the N3 mainline carriageway. Fingal County Council requests that the length of the existing taper diverge lane be retained in so far as is possible, and that the existing overhead sign gantry is retained at approximate chainage A1750.
  - Fingal County Council would have concerns regarding the suitability of cyclists using the N3 mainline due to the speed, volume, and type

of vehicles using the road. Fingal County Council accepts that a separate reduced speed limit of 60kph for the proposed bus lane is a suitable proposal and a byelaw implementation may be necessary in this regard. High quality segregated active travel infrastructure parallel to the N3 as defined in the NTA's GDA cycle network plan and allowed for in the Fingal Development Plan, such as the proposed Tolka Valley Greenway and the proposed improvements through Blanchardstown village, would be safer and would likely prove more attractive to cyclists if in place.

- There are several roads that are not currently in public ownership, and it is not clear how bus lane enforcement, for example, will be carried out in this regard.
- The proposed extent of the circulatory road and interchange to be under public control should have a speed limit of not more than 50km/h but 30km/h will be more suitable at locations where there are pedestrians or cyclists crossing. A lower speed limit is all the more desirable given the likely trend of development in this area, with the bus interchange and future developments likely to significantly reduce car dependency in the longer-term.
- The retention of the bus lane from the proposed bus interchange all the way to the bus only on ramp at the Blanchardstown N3 interchange should be considered to allow for better management of the bus lane.
- The location of cycleways and the crossing for cyclists at any junctions should be designed to improve priority and safety for cyclists.
- Concerns regarding priority of pedestrians at junctions.
- Use of unused kerbed central reservation at Blanchardstown Road South (Mulhuddart Interchange) N3 bridge crossing for diversion of traffic and widening of footpath.
- Design of Blanchardstown station to enhance public realm.

#### **4. TII**

- General support for scheme.
- Concerns relate to the existing diverge lane between the Mill Road bridge and the access Rd. to the James Conley hospital, it was requested that the length of the existing taper diverge lane be retained as close to its existing

configuration as possible and that the existing overhead sign gantry is retained at approximate chainage A1750.

- Concerns in relation to the use of the proposed bus connects bus lanes on the N3 by cyclists.
- Parallel cycle infrastructure alternatives would need to be in place prior to the opening of the bus connects corridor along the N3.

#### **5. Department of Housing, Local Government and Heritage - DAU**

- Standard conditions are recommended in relation to archaeology and protection of water quality.
- No removal of trees/hedgerow during breeding season.

#### **6. Inland Fisheries**

- Tolka – linkage for migrating salmon, sea trout and eels.
- Adequate protections are required during construction through environmental construction management planning.
- Guidelines on protection of fisheries during construction should be consulted.

#### **7. Irish Water**

- No objection in principle
- Applicant has engaged with IW
- Detailed design drawings are required.
- Designs will have to be in accordance with IW standard details and codes of practice, all specifications for design details are outlined in submission.